Revised draft Drought Plan 2027 Appendices

Yorkshire Water

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In accordance with Drought Plan guidance, this statement certifies that Yorkshire Water's Drought Plan has been reviewed by our security team. Some information has been redacted or edited in this published version for reasons of national security.

Appendix 1: Drought Plan (England) Direction 2025

The Drought Plan (England) Direction 2025

The Secretary of State makes the following Direction in exercise of the powers conferred by—

(a) section 37B(11) of the Water Industry Act 1991(**a**), as applied by section 39B(5) of that Act; and

(b) section 39B(4)(d) and (9) of that Act(**b**).

The Secretary of State has consulted the Welsh Ministers in accordance with article 5(1) of the National Assembly for Wales (Transfer of Functions) Order 1999(**c**).

Citation, commencement and application

1. — (1) This Direction may be cited as the Drought Plan (England) Direction 2025 and comes into force 23 July 2025.

(2) This Direction applies in relation to a water undertaker whose area is wholly or mainly in England.

(3) This Direction applies to any draft drought plan (and subsequent drought plan) submitted to the Secretary of State after 28 days 23 July 2025.

Interpretation

2.—(1) In this Direction—

"the Act" means the Water Industry Act 1991;

"drought plan" means the plan which a water undertaker is required to prepare, publish and maintain under section 39B(1) of the Act;

"water undertaker" is to be construed in accordance with section 6 of the Act(**d**).

(2) A reference in this Direction to section 37B of the Act is a reference to that section as applied by section 39B(5) of the Act.

Matters to be addressed in drought plans

3.—(1) A water undertaker must address the following matters in its drought plan—

(a) how the water undertaker's management structure will manage, communicate and make decisions when using its drought plan;

(b) the drought management measures that a water undertaker expects to take to maintain supply for the onset, duration and abatement of all potential droughts covered by its plan;

(c) how the sequencing of measures has been designed to limit impacts on customers and the environment, and to consider measures restraining demand ahead of measures increasing supply;

(a) 1991 c. 56.

(b) Sections 37B and 39B were inserted into the Water Industry Act 1991 by sections 62 and 63 of the Water Act 2003 (c. 37). Section 39B was amended by section 28 of the Water Act 2014 (c. 21).

(c) S.I. 1999/672, amended by section 100(2) and (3) of the Water Act 2003; there are other amendments but none is relevant. Functions of the Secretary of State under sections 37B and 39B of the Water Industry Act 1991, in so far as they relate to matters other than the construction or enlargement of reservoirs, were transferred to the National Assembly for Wales in relation to any water undertaker whose area is wholly or mainly in Wales by S.I. 1999/672. Those functions were subsequently transferred to the Welsh Ministers by virtue of section 162 of, and paragraph 30 of Schedule 11 to, the Government of Wales Act 2006 (c. 32).

(d) Section 6 was amended by section 36(2) of, and paragraphs 2 and 3 of Schedule 8 to, the Water Act 2003; by paragraphs 1 and 6 of Schedule 7 to the Water Act 2014; and by paragraph 28(1) and (4)(b) of Part 5 of Schedule 23 to the Deregulation Act 2015 (c. 20).

Publication of draft drought plans and drought plans

5.—(1) Except where the Secretary of State otherwise permits, a water undertaker must publish its draft drought plan in accordance with section 37B(3)(a) of the Act for consultation within 30 days beginning with the date on which the Secretary of State confirms it should do so.

(2) Except where the Secretary of State otherwise permits, a water undertaker must publish its final drought plan in accordance with section 37B(8)(a) of the Act within 30 days beginning with the date on which the Secretary of State confirms it should do so.

Responding to representations

6. Except where the Secretary of State otherwise permits, a water undertaker must produce the statement required by regulation 4 of the Drought Plan Regulations 2005(**a**) within 22 weeks after the date on which the water undertaker publishes a draft of its drought plan under section 37B(3)(a) of the Act.

For and on behalf of the Secretary of State

Signature redacted

Martin Woolhead
Deputy Director, Water Sector Delivery
Department for Environment, Food and Rural Affairs

Date 22 Jul 2025

(a) S.I. 2005/1905, to which there are amendments not relevant to this Direction.

Appendix 2: Government expectations letter, July 2025

Date: 22 July 2025

Government expectations for water company drought plans

For water companies operating wholly or mainly in England.

1. Introduction

Our changing climate means droughts are becoming increasingly likely. A secure water supply is at the heart of the government's strategy. Planning for, and improving, our resilience to droughts is critical.

Your drought plan sets out the actions you will take to manage demand and maintain water supplies during droughts. Your plan must a) where possible avoid and mitigate damage to the environment, b) use your experience from dry weather events, and c) show the wider role you play across your region, working with your regional water resources group.

Your drought plan complements your Water Resources Management Plan (WRMP), which assesses the vulnerability of your water supply system to dry weather and droughts and the preferred strategic solutions to address any supply and demand shortfalls.

This document explains the government's expectations for your drought plan. The use of the words "must", "should" and "could" follow the same definition as set out in Section 1.2 of the EA's Water Company Drought Plan Guideline.

2. Government expectations

During the drought and heat waves of 2022, most water companies implemented their drought plans. Some drought plans were not as effective at securing water supplies to the level of drought experienced.

You should be prepared for unexpected and more severe droughts to reduce risks to customers and the environment. Your drought plan should:

(a) show you are responsive in implementing your drought actions to reduce demand, including use of Temporary Use Bans (TUBs)

The 2022 drought highlighted the need for water companies to respond more decisively when implementing water demand management measures to protect water supplies. The measures were not implemented quickly enough to help reduce the high demand companies experienced. Your plan must set out how you will respond to drought triggers without delay and consider use of TUBs at any time of the year, without waiting for rain or the start of autumn/winter.

We expect you to consider the wider benefit of TUBs, if it helps manage exceptionally high customer demand and/or reinforces the water efficiency messaging to your customers. You should work closely with your regional water resources group and neighbouring water companies to consider regional benefits.

(b) show you have explored further demand actions which can be implemented to significantly reduce customers' water use in a drought

With a finite supply of water, managing customer demand is a key measure for water companies. Both household and non-household customers should be encouraged to do more to reduce water use as a drought progresses.

TUBs and non-essential use restrictions (for non-household customers) are used to reduce customers' water use to protect essential water supplies. However, no further demand-reducing actions are generally considered or implemented to reduce customers' water use to delay the use of emergency measures, such as the use of standpipes and rota cuts.

We expect your plan to be informed by work with the Environment Agency to explore and develop further, innovative demand actions that you could use to reduce customers' domestic water use before you implement emergency drought measures. Smart meters will make more sources of data available to help monitor the effectiveness of these actions. We saw South Africa use innovative techniques to reduce water use during their 2015 drought and we need to consider what further innovative approaches could be used in England.

(c) show your extreme drought management actions are sufficiently developed and viable

You should ensure the actions you plan as a drought gets worse (your extreme drought management actions at Level 3b as per the Environment Agency's Drought Plan Guideline) are sufficiently developed and viable. You should be confident that you could implement your extreme actions within the timescales that may be required.

We understand you need to balance your level of drought readiness, risk and investment. However, you need to ensure you can rely on your extreme drought management actions to provide extra water to help delay or remove the need to implement your emergency plan for drought.

(d) clearly show when you intend to move to your emergency plan for drought

You should consider the timing required to trigger the preparation for and move to your emergency plan for drought actions. You will need to clearly show the point at which you will trigger the move from your drought plan to your emergency plan for drought including any preparations.

(e) show timely communications and joined up actions with New Appointments and Variations (NAVs), water retailers and others

You should plan for clear, regular and timely communications about the actions you will be taking. This includes communications with NAVs, water retailers, other water companies, regional water resources groups and other sectors and groups. For example, you should ensure you inform NAVs and retailers in good time when you issue calls to customers to reduce demand or decide to implement TUBs. This allows the NAVs to take co-ordinated action in a timely way.

Your plan should be informed by an improved understanding of sectoral impacts of droughts and what you can do to help either directly or through your regional water resources group. You should ensure groups such as the local resilience forums are included in your pre-consultation discussions and that these discussions are properly represented in your plan.

(f) assess your annual drought preparedness

You should be ready and able to implement the actions you include in your published drought plan. You should assess and communicate your level of drought preparedness and your drought permit or order application readiness annually to regulators.

In 2022, there were delays in the assessment and determination of many drought permit applications due to their poor quality. You should undertake the appropriate level of pre-application work for any authorisations and drought permits and orders, which are most likely required in advance of a drought. You must allow sufficient time to resource and complete these applications during a drought.

You should also plan for and understand the time needed to prepare applications for the permits and orders that are less frequently needed.

You should keep the regulators informed regularly about your reviews and drought readiness. This will allow regulators to feedback any concerns and advice they have with your preparedness.

3. Additional information

- Information is available to the Public on how water companies are expected to plan for dry weather and drought on GOV.UK: https://www.gov.uk/government/publications/drought-managing-water-supply/drought-how-water-companies-plan-for-dry-weather-and-drought
- The Environment Agency's and Defra's guideline that water companies should follow when drafting their new drought plans is published on the Environment Agency's external SharePoint site (not open to the Public): https://defra.sharepoint.com/sites/Community1339/Guidance/Forms/AllItems.aspx?id=%2Fsites%2FCommunity1339%2FGuidance%2FDrought%20plan%20guidance&viewid=ec99310b%2D620c%2D4088%2Db15a%2D3b7b22fde0d5
- The Environment Agency's report "Spotlight on Drought 2022: Water companies in England, December 2023", previously shared directly with all water companies.
- The UKWIR report published in 2023 "Managing through drought: Code of practice and guidance for water companies on water use restrictions – 2023 (Incorporating lessons from the 2022 drought)": https://ukwir.org/update-to-the-drought-code-of-practice-2013

Appendix 3: Drought vulnerability assessment

In order to assess our resilience to droughts we have tested our system against a range of droughts, following the methodology described in the UK Water Industry Research (UKWIR) and Environment Agency (EA) project The UKWIR, 2017 Drought Vulnerability Framework (DVF). The following sections summarise how we have implemented these analyses. We use drought response surfaces to show how our Grid zone responds to droughts of different rainfall deficits and duration. They are shown for droughts ending in August and November, and for simulations run at the deployable output level of demand at the 1 in 500 and 1 in 200 year resilience levels, as described in our Water Resources Management Plan 2024 (WRMP24)[1].

We have estimated the return period of events ending in August and November, as recommended for our system in the UKWIR 2017 report.

We have used the Python Water Resources (PyWR) simulation model runs with stochastic time series that we used for our deployable output estimation.

Figure 1 to Figure 4 show drought response surfaces for the Yorkshire Water Regional reservoir group. The surfaces show the results of modelling the stochastic data, with each drought event classified in terms of the rainfall deficit and duration. The shading shows the number of weeks that level 4 restrictions would have been triggered. The black dots show historically recorded droughts, and the dashed lines show the estimated values of droughts of different return periods. As these analyses are based on the stochastic data sets, they only include rainfall deficits and durations which are part of the stochastic replicates, so if a specific duration and deficit combination is not in the stochastic series, there are no results for that drought duration / deficit combination.

The drought response surfaces are useful to understand our system resilience to different severity and durations of drought, and how changes to our system would change this vulnerability. However, they do not give a vulnerability that directly maps to our deployable output. This is because for our deployable output estimates we have used extreme value analysis techniques to estimate the return period of modelled reservoir stocks hitting our level 4 drought restrictions

[1] Deployable output (DO) is the demand that can be sustained at a given level of service - and for WRMP24, the DO was calculated for the 1 in 200 and 1 in 500 year return period level of resilience for Level 4 restrictions such as standpipes and rota cuts.

trigger. Figure 1 shows the response surface for the 1 in 200 year level of resilience deployable output for droughts ending in August. This shows that we could have level 4 restrictions for a week, for 12 month long droughts with a drought return period of 1 in 200 years, and, that the worst historical droughts in our 130 year rainfall record would not have level 4 restrictions. It should be noted that these analyses are based on the raw model results, so do not relate exactly to our estimation of deployable output using extreme value analysis techniques.

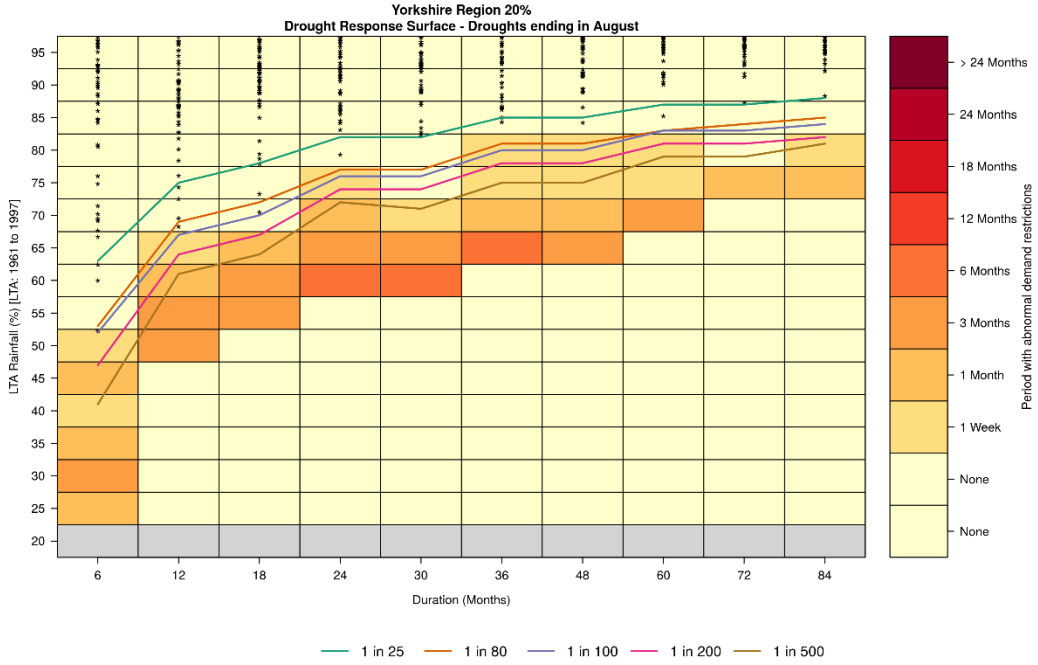

Figure 1 DRS for Grid Zone 1 in 200-year Resilience Level (August end month)

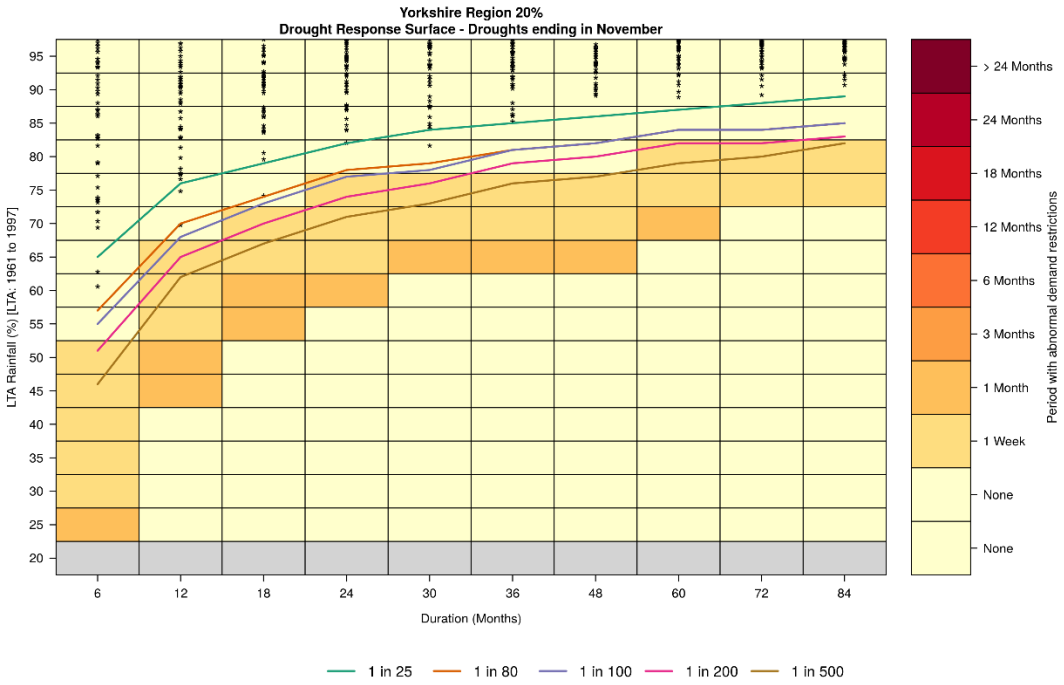

Figure 2 DRS For Grid Zone for 1 in 200-year resilience level (November end month)

Figure 2 shows the response surface for droughts ending in November at the deployable output at the 1 in 200 year level of resilience. This shows droughts with a return period of 1 in 200 years in the stochastic record would trigger level 4 restrictions for up to 1 week, and level 4 restrictions would be triggered for between 1 week and 1 month at the 1 in 500 year return period.

Figure 3 shows the response surface for droughts ending in August at the deployable output at the 1 in 500 year level of resilience (a lower deployable output value than shown in Figure 1 and Figure 2). It shows that we could have level 4 restrictions for up to 1 week for 12 month long droughts with return periods of 1 in 500 years, and that the worst historical droughts in our 132 year rainfall record would not have level 4 restrictions. It should be noted that these analyses are based on the raw model results, so do not relate exactly to our estimation of deployable output using Extreme Value Analyses (EVA) techniques.

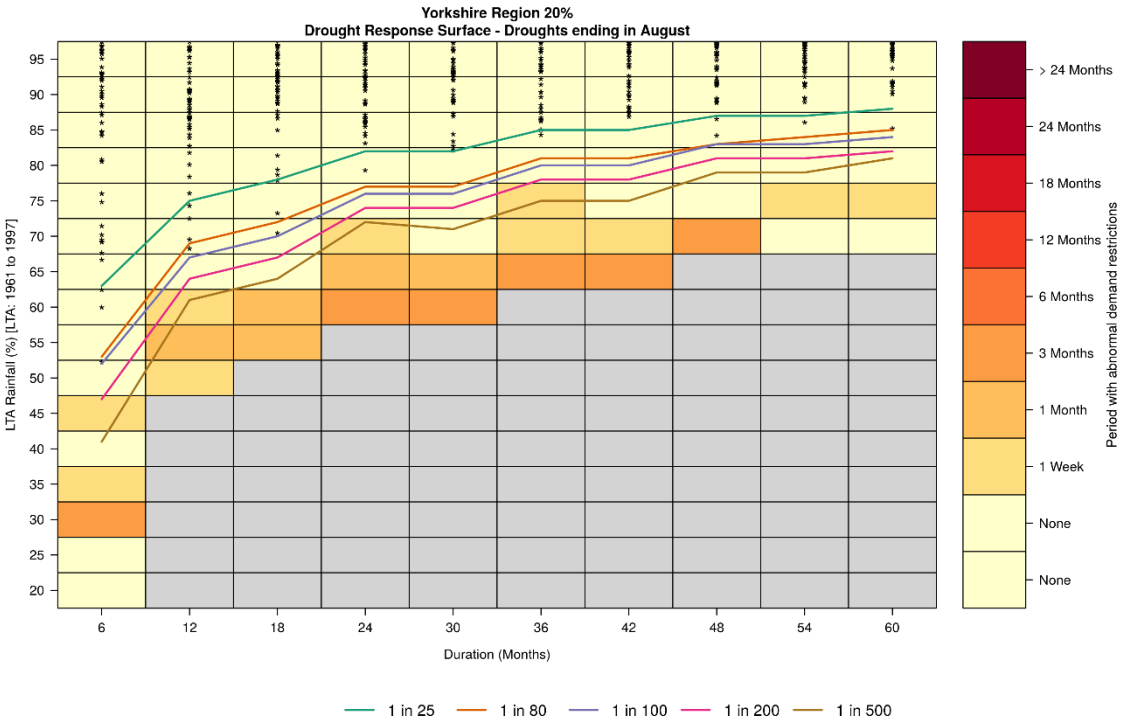

Figure 3 DRS for Grid Zone for 1 in 500-year Resilience level (August end month)

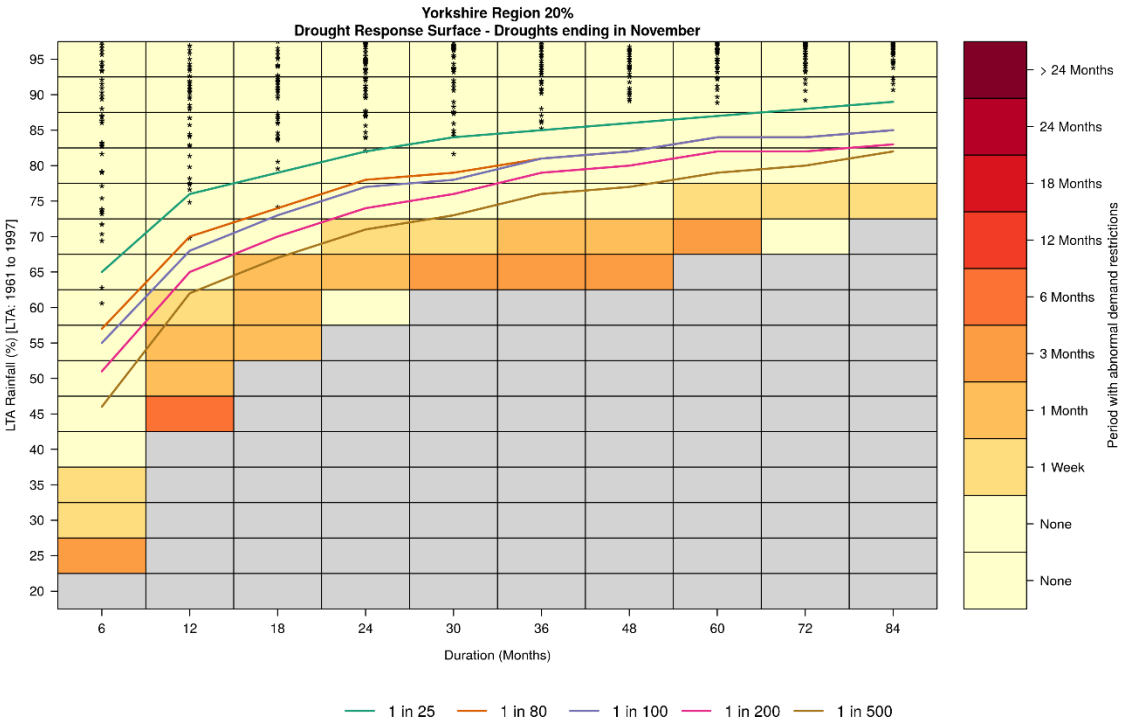

Figure 4 DRS for Grid Zone for 1 in 500-year resilience (November end month)

Figure 4 shows the drought response surface at the deployable output demand for our 1 in 500 year level of resilience for droughts ending in November and shows that for droughts with a return period of 200 years or less there would be no restrictions.

Our drought response surfaces show that we would have level 4 demand restrictions for only 1 month or less for any event with a return period of less than 1 in 500 years, although there are uncertainties in the return period analyses, with the most extreme droughts in our record having return period of between 1 in 132 and 1 in 264 years depending on analysis method. These surfaces can only give an indication of our system response to droughts.

The main conclusions of the assessment were:

- Stochastic droughts represent far worse events than have been seen in the historical record, so we are preparing for worse events than those that have already been experienced. It should be noted that the return period analyses have been carried out on the stochastic inflows for fixed drought durations, and the real drought events may be more or less extreme when analysed for different durations or using different metrics, such as rainfall. Extreme events such as long duration droughts are likely to become more common as the impacts of climate change worsen. The Grid SWZ is vulnerable to summer droughts, especially those of 6 and 12 months duration, ending in August. These risks are managed using the drought triggers and actions detailed in this drought plan (sections 2 and 3 respectively). In the Grid SWZ, for a 1 in 200 return period drought ending in August, the stochastic data shows we could have drought level 4 emergency restrictions for a week for scenarios such as a 12-month drought, but the worst historical droughts in our 132-year rainfall record don't have level 4 restrictions. The results show that for the Yorkshire Water system when run at the 1 in 200 deployable output demand of 1356Ml/d for the Grid SWZ, none of the historical droughts, resulted in level 3 drought actions. The worst historical droughts in all cases have an approximate return period of one in 100 years (to be expected with 95 years of record).

We believe this drought response surface illustrates the resilience of our supply system both to droughts we have experienced and to droughts of up to 200-year return periods.

Appendix 4: Drought management actions

The drought actions available to us include measures that can either reduce the demand for water or increase available supplies. We describe our drought actions in Section 3 of our main Drought Plan document. This appendix provides additional information on how we implement the actions and the estimated benefits.

At the start of a dry weather period, we will implement actions that have no or little material impact on customers or the environment. As a dry weather event escalates, the actions available to us include imposing restrictions on customers and taking more water from the environment. Some actions require legal approvals through the granting of a drought permit or drought order. We prepare for these well in advance and have pre-written applications we can update if a drought develops.

A dry weather period will not always develop into a drought. However, by taking action at the onset of dry weather we can reduce the likelihood of a drought developing and increase our resilience in the event that a drought occurs. Our initial drought actions will balance the need to conserve water supplies against the risk of taking more extreme actions too early, which could cause unnecessary disruption to customers and the environment.

Reporting and monitoring

Below we describe our reporting and monitoring. This activity is key to our business-as-usual operations and at the onset, during and after a drought. It informs decision making on operational optimisation and the likelihood of crossing triggers and implementing drought actions.

Our reporting and monitoring processes

Our Water Production Planning team are constantly monitoring water availability, balancing the use of resources and adjusting for outages. This allows us to react to reduced rainfall and increased customer demand in line with our level of service commitments.

We have a number of routine reports and management processes embedded into our operational production planning processes. In times of drought, these reports are used for water resources monitoring, drought management, and forecasting. The frequency of reporting and decision-making is increased as

necessary during a drought to fulfil operational and regulatory requirements. This section summarises these reports and how they are used for drought management.

Water situation report

This section on the water situation report will be updated to include the reservoir bands when this drought plan is finalised. Our 'water situation report' (Watsit) includes the latest data on rainfall, river flows, groundwater levels, reservoir storage, demand, water treatment work outputs and flows in key grid pipelines.

The Watsit drought monitoring section, also includes reservoir storage data for the Yorkshire region as a whole (Figure 5) and for each of our reservoir groups. The Watsit is used to monitor storage in relation to operational control lines. There are 10 control lines in total and six of these have been used in defining our drought trigger bands which are linked to drought actions. See Section 2.2 of our main Drought Plan document and Appendix 9.2 for further information on the use of control lines to form the bands. The generation and operation of these lines are described in our supplementary report on *Drought Plan 2027 – Drought Triggers and Worked Examples.*

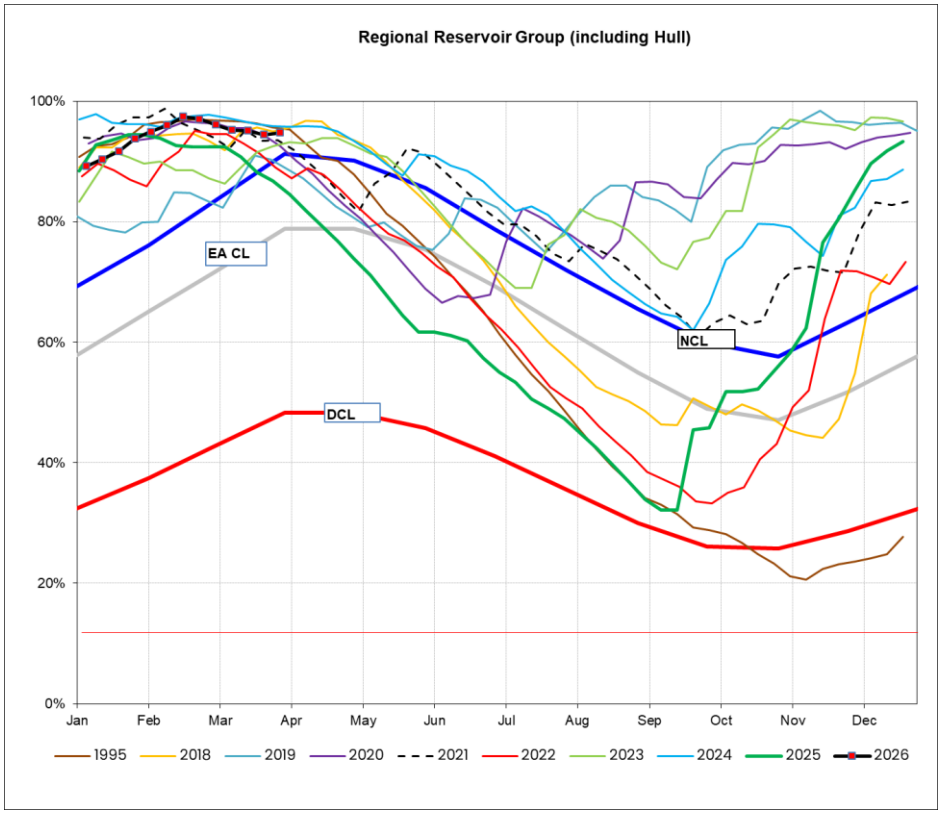

Figure 5 Watsit Reservoir storage for the whole Yorkshire Region plotted with control lines

Water production planning report

The water production planning report determines key flow target settings for the week ahead for our reservoirs, river abstractions, boreholes, water treatment works, and pipelines. The process takes information from the Water Situation Report and then, using the water resource allocation plan model, determines the best use of available resources to meet demand and maintain security of supply. Resources are optimised to minimise costs, environmental impacts and carbon emissions.

Water resource allocation plan

The water resource allocation plan (WRAP) model takes account of expected demand, river flows, reservoir and groundwater operating rules, and licensing constraints for the week ahead. Many of our river abstractions licences have conditions that vary the volume we can abstract according to river flow. These conditions restrict abstractions at times of low flow, typically in the summer, and allow increased abstractions during higher flows, typically in the autumn and winter. In addition, temporary constraints such as outages for maintenance work or water quality problems are considered.

The implementation of the WRAP is managed by the Service Delivery Centre, which can also make adjustments at any time in response to any changes in asset availability, customer demand, or unforeseen events, escalating to our Duty Manager if required.

During dry weather, the forecast output from the Water Resources Planning Report (WRPR) is used as additional input to the WRAP model to ensure operational plans and flow targets align with the longer-term risks identified in the WRPR.

Water Resources Planning Report (WRPR)

The WRPR is produced from the output of our PyWR simulation model. It replicates the operation of our whole water resources system allowing us to model a range of scenarios. The scenarios explore different rainfall, reservoir inflow, river flow, demand, and operating conditions. The results identify regions and reservoirs impacted by dry years and we then carry out additional modelling to assess the need for mitigating activities (or remedial actions).

For example, we model the impact of different forecasts on current reservoir storage levels, accounting for current operating constraints. This can include

forecasts of the impact of previous weather patterns (for example, following a summer drought, how would stocks respond if we were to experience a dry winter like that of 1995-96), or a stated proportion of long-term average rainfall (for example, 80%) on current stock levels.

We use the scenario outputs to assess the likelihood of reservoir storage levels reducing and crossing into the next drought level within each reservoir group (See *Drought Plan 2027 – Drought Triggers and Worked Examples*), which would trigger the implementation of appropriate drought actions (Section 3 in the main report). We also identify remedial actions to reduce and / or balance out the demand across any resource groups at risk.

During dry weather, the output from the WRPR is also used as an additional input to the WRAP model to ensure an integrated approach to drought risk management.

Drought prospects reporting

The EA request water companies forecast drought risks every year. We do this by using water resource models which utilise stochastic inflow data to forecast the impact of different percentage of long-term average (for example, 60%) rainfall scenarios over the next 6 months. The risk depends on the actual reservoir stock levels at the time of forecasting, and if lower than average the risk of drought is greater. If we are in 'recovering from drought' status, our drought prospects report helps with the decision-making on the lifting of drought actions.

Demand-side drought options

Implementation information and benefit estimates for our demand-side drought actions are provided in Table 1 to Table 4.

Water saving through demand side drought management actions

It is not possible to accurately predict the benefits of each demand reduction option or to disaggregate them from each other. Our estimates are based on our own experience and information available in industry research papers but could be very different in future droughts.

Each drought is associated with a unique pattern of events, and the effect of future water efficiency campaigns and restrictions will not necessarily be the same in all droughts. As observed in "Modelling the Impact of Restrictions on

Demand During Drought" (UKWIR, 2006/07), consumers' response to drought may vary depending on the frequency and severity of future droughts and restrictions on demand.

The report also noted that restrictions are generally part of a sequence of events which combine to influence demand. Therefore, any decrease in demand cannot necessarily be attributed to the restriction itself. The observed impacts of a restriction are a function of all preceding activity such as earlier restrictions imposed, neighbouring water company restrictions, media coverage, awareness campaigns and timing of the implementation of restrictions.

Water saving may be greater because of external influences such as national media and neighbouring water companies' campaigns and activities. In other droughts savings can be less than expected. For example, the weather and factors such as school holidays can also have significant impacts on customer demand. A recent research report "A Review of the Impacts of Communications Campaigns and Temporary Use Bans In 2025, Summary Report" (UKWIR 2026) concluded it was not possible to provide a single estimate of savings from TUBs or communication campaigns and savings are specific at the household, district metered area and water resource zone level.

Communications and voluntary water efficiency initiatives

The 2025 Drought Planning Guidance (DPG) recognises the use of water efficiency communications as a drought action. As we enter a period of prolonged dry weather, we use a range of communication channels to request that customers in our supply area voluntarily reduce their water use. The content and channels are scaled up as a drought escalates. Our communications plan is described in detail in Appendix 7. The potential savings from our drought communications and other demand-side drought actions are discussed here.

Water conservation is important all year round and not just during dry weather. We currently promote water efficiency and offer demand reduction initiatives to all customers regardless of reservoir levels. These activities support our WRMP24 objectives and are summarised below.

- Our water saving campaign is live throughout the year with tangible advice on water saving based on the season. During the spring and summer, we communicate with customers on a weekly basis through social media about our reservoir levels. For example, winter creative focuses on swapping baths for showers, only running dishwashers and washing machines when full. We

increase our messaging during the spring and summer to include outdoor use. We also have high demand messaging which will trigger in high temperatures. All ads drive traffic to our website where customers can engage with water saving tips and order water saving products.

- Household water efficiency home visits, offering provision of water saving devices and leak repairs.
- Upgrading existing meters to smart meters and offering a flow regulator. A flow regulator is a device that provides households with a constant flow of water to their property. It saves water as flow to the property will not increase if pressure in the area is increased to meet peak demands.
- Water Efficiency School Education Programme delivered by the Yorkshire Water Education Team through existing education programmes.
- Household water efficiency campaign encouraging behavioural change for example, through our website, billing, social media, paid advertising channels including out of home (buses/billboards) and broadcast channels (radio/TV).
- We will also engage with commercial water users to promote and advise on water efficiency through the Wholesale Services team in consultation with retailers and new appointee variations (NAVs).

In a period of prolonged dry weather these activities will be enhanced and used to make customers aware of the situation. The potential savings included in Table 1, Table 2 and Table 3 for communications and demand reduction initiatives are dependent on multiple variables including weather variations, time of year and economic factors.

Action Name	Voluntary Water Conservation	Water Efficiency Initiatives
Action Description	Encourage domestic and commercial water users to take action to reduce their water use through promoting the need for water savings using a variety of media channels. As the drought progresses we enhance the tone and frequency of messages and add additional channels.	Water-efficiency home audits with installation of tailored water-saving retrofit devices, including flow regulators, for household customers, with targeted application to non-households where appropriate. As the drought progresses, we will aim to accelerate the initiatives and focus on areas of high demand and pressure.
Implementation Timetable	Communications will be enacted within days of crossing the trigger.	1 month to achieve saving.
Trigger and Drought Level for Action	Action is triggered when regional reservoir stocks enter the level 1 band.	Action is triggered when regional reservoir stocks enter the level 1 band.
Estimated Demand Savings	Savings are estimated to be up to 1% of Distribution Input (DI). DI is the total quantity of treated water (potable water) that a water company puts into its distribution system, measured at the point of production. These savings are expected to vary depending on the specific nature of the drought.	
Location / Area Affected	Grid SWZ and East SWZ.	Applies to Grid SWZ and East SWZ but we will focus on areas where we see highest increase in water use.

Action Name	Voluntary Water Conservation	Water Efficiency Initiatives
Engagement with NAVs and / or Water Retailers	We will seek to work closely with NAVs and retailers to promote water efficiency messages to their customers. We will ensure all NAVs and retailers are made aware of our communications to raise awareness of the situation or if necessary, inform them of impending water use restriction.	We will notify NAVs and retailers of our activities and initiate conversations with retailers on joint campaigns.
Period or time of year implemented	Water saving is promoted all year round and will be enhanced in reaction to dry weather at any time of year.	Activity is available at any time of year.
Permissions or Constraints	No external permissions required.	No external permissions required for offering to our household customers. We will consult with retailers and NAVs on any activity that we are proposing to offer to their customers.
Risk Assessment	Publicity campaigns do not provide a fixed benefit and are difficult to quantify. Not all customers respond and the appeal to conserve water may even have an adverse effect, leading to increased water use. Savings are difficult to disaggregate from other initiatives and variations in use due to weather patterns and behaviour e.g. water use in school holidays is different to term time.	This activity will be in addition to our ongoing water saving initiatives and is only possible if additional human resources are available to deliver the activities. All actions require customers or other parties to take up the offers and this is not guaranteed. Savings are difficult to disaggregate from other initiatives and variations in use due to weather patterns and behaviour.

Table 1 Communication and voluntary water saving actions

Leakage reduction during dry weather

We continue to invest in new leakage reduction techniques to improve our water supply resilience. Our ambitious AMP8 leakage reduction programme is detailed in our WRMP24 plan. This means we are already enhancing our leakage activity significantly year on year. If leakage levels do increase during a drought, we will aim to reduce to normal levels for the time of year and achieve the annual leakage target for that year.

During dry weather leakage can increase as a result of ground movement. We continually monitor our leakage levels, and we would increase our active leakage control effort at level 1 in reaction to breakouts and bursts although this is partly dependent on the time of year and the actual leakage levels. The impact of drought on leakage is variable depending on temperatures and soil moisture deficit (SMD) and we may not necessarily see increased breakouts. When SMD does lead to additional leakage we will take action to reduce leakage, but this may only be effective in lowering the peaks and 'normal' levels may not be achieved.

The potential savings from additional leakage reduction presented Table 2 are due to counteracting leakage breakouts to help reduce demand during the drought. The benefit of the extra leakage activity will be dependent on the leakage level at the time of the drought.

Increased active leakage control

We recognise that delivery of additional active leakage control during a drought event, requires a robust and well supported plan. We need to be able to mobilise and co-ordinate significant resource levels, and they must be well managed and supported to perform effectively and operate safely. Our strategy is based on supporting reactive teams to respond swiftly to any associated leakage breakouts or bursts. This can mean reducing response to non-customer impacting network issues in order to increase support to proactive leakage teams.

The planned response will be to use experienced leakage find resources to support the reactive teams so that we can deal with the immediacy of any SMD / drought related breakout. We will then review resources required to support active leakage control and deploy resources accordingly.

Leakage "find teams" will be supplemented through deployment of field technicians, distribution maintenance technicians and meter reading personnel.

Fix resource will be sized to match find resource. Non-essential repair and maintenance activity will cease, and all capable resources redeployed to leakage repair activity. Regular liaison with highways and local authorities will be required as we will need to complete work under emergency notices or permits. Implementation of additional resource and overtime weekend working will supplement the approach.

Teams across our Water Service Delivery business unit will flex resource accordingly to meet demand. All non-essential training, and down time will be cancelled. Enhanced analytics will ensure effective targeting of district metered areas (DMAs), reducing any delay between detection and repair. Any prevailing leakage promotion thresholds will be removed to ensure work promotion through to repair remains high. Promoted jobs will be prioritised through a daily hub consisting of leakage analyst and water planning resources to ensure higher priority bursts based on quantified leakage levels or other risks, such as, supply interruptions, are repaired first.

Pressure management strategy

Pressure management within the water supply distribution network can contribute to leakage reduction alongside enhanced active leakage control activity. By reducing water pressure within the network, this reduces leakage from unidentified leaks and lowers the risk of new bursts. We use pressure reducing valves to manage the pressure within our network to achieve the leakage reduction benefits whilst maintaining sufficient water pressure for customer supply. Table 2 summarises our pressure management options through drought escalation and any impact on customer service.

Table 2 shows the pressure management options to be used in a drought. In the event of drought conditions, we would enact level 1 of our pressure reduction strategy. Where possible, with the use of advanced pressure controllers we would reduce the target pressure at the critical point within that area from 16m to 15m static pressure in the main, this is the lowest level we could obtain to ensure customer standards are not impacted. If conditions worsen and with appropriate sign off, level 2 could be enacted where we would reduce the water pressure in these areas to 10m static pressure in the water main during off peak hours, increasing to 15m during peak hours. Any final decision would need to give special consideration to key customers to ensure that any priority and production services would be maintained.

It is important that we maintain service standards set by Ofwat, we would only use further pressure reduction in a controlled manner and in areas where we deem it is needed. Whilst we would seek to reduce pressure to conserve supplies, it cannot be reduced so low that it would likely result in increased customer contacts and customer appointments being made which would increase workload on operational resource. We consider customer contacts further in our communication plan – see Appendix 7.

Action Name	Pressure Management	Active Leakage Control
Action Description	Initially reduce static pressure to 15m at the highest property in the area implemented and maintain for the duration of the prolonged dry weather. As drought progresses, static pressure reduced to 15m during peak hours at the highest property in the area implemented, and to 10m during off-peak hours (12 to 04:00). Further enhanced pressure reduction with time-based control to further conserve supply as required.	We will increase active leakage control activities and deploy additional resources through redeployment of teams with the necessary skills and overtime / weekend working. Initially we will focus on areas with highest breakouts and as the drought progresses extend to across the region and increase weekend working.
Implementation Timetable	Phased approach to keep a calm network and minimise customer impact.	1 month to achieve saving.
Trigger and Drought Level for Action	Action will be considered when regional reservoir stocks enter the level 1 band.	Action will be considered when regional reservoir stocks enter the level 1 band.
Estimated Demand Savings	Increases savings to up to 2% of DI by level 3. These savings are expected to vary depending on the specific nature of the drought.	
Location/ Area Affected	Initially apply to target areas where the risk to failing ODIs standards is low and there is evidence of leakage breakouts due to hot weather. As drought progresses, increase implementation across the region but continue to avoid areas of high risk of pressure becoming too low.	Initially apply to target areas where there is evidence of leakage breakouts due to hot weather. As drought progresses, Increase implementation across the region.

Action Name	Pressure Management	Active Leakage Control
Engagement with NAVs and/or Water retailers	We would communicate directly with category 1 sensitive customers and ensure we don't reduce pressure below legal or contracted minimum.	We will notify NAVs and retailers.
Period or time of year implemented	Activity is available at any time of year.	Activity is in response to dry weather causing ground movement therefore is likely to be in the summer months.
Permissions or Constraints	Must meet ODI standards for pressure levels.	Liaison with highways / local authorities to complete work under emergency notices or permits.
Risk Assessment	Must be carefully managed to avoid any unintended consequences of not meeting customer standards. If customers report low pressure problems, teams will be deployed to address the problem and the action may be reversed.	Activity is limited by human resources and overtime must be balanced so that teams receive appropriate time off. We will seek to employ additional human resources but there is a risk that not available, especially if other areas of the country are experiencing drought. Redeployment of resources could impact on other performance commitments (C-Mex and asset health). Savings are variable depending on conditions at the time.

Table 2 Pressure Management and leakage demand management options

Restrictions on use

We are permitted to restrict water use under section 76 of the Water Industry Act 1991, as substituted by section 36 of the Flood and Water Management Act. The triggers and activities impacted by a temporary use ban (TUB) and non-essential use bans (NEUB) are explained in Section 3 of our Drought Plan. Table 3 provides further information on the implementation of restrictions on use. Draft notices for restrictions have been prepared using templates provided in the *Code of Practice and Guidance for Water Companies on Water use Restrictions* (UKWIR 2023).

During the period leading up to the advertising of restrictions the notices will be reviewed in the context of the current situation and the need for restrictions discussed with key stakeholders including NAVs and retailers operating in our area, the NFU and consumer groups such as the Consumer Council for Water (CCWater).

If stock predictions were showing a potential need for restrictions the exact requirements would be discussed as part of the incident management team meetings (see Appendix 8) with specific actions raised, assigned and delivered. This would include finalising the notices, arranging newspaper and other media coverage, liaising with key stakeholders, producing additional information such as frequently asked questions and preparing Yorkshire Water Customer Service Teams for dealing with the consultation and customer enquiries. Scripts would be prepared, and they would be provided with contact details of key individuals on the drought incident management team.

Details on how to make representations on the restrictions will be included in the legal notices which will be advertised as a minimum in two newspapers and on our website. We will provide a dedicated email address for public representations.

Our estimates for water use restrictions are based on observed water saving during the 2025 drought, and estimated savings presented in the '*Code of Practice for Water Companies on Water Use Restrictions*' - 2023 (UKWIR, 2023).

We previously calculated the deployable output benefits of implementing restrictions for our WRMP24 (these are shown in worksheet '6. Drought Plan Links

of the WRP tables[2]). These estimated benefits were included in the WRMP24 as options that are needed to help close deficits in the early years of the plan but are less likely to be needed in later years as we invest to be more resilient to droughts. The total percentage savings for the activities in the WRMP24 is estimated to be 5% based on an annual average of deployable output.

Savings from temporary use bans

As set out in Table 3, we estimate peak water savings up to 5% of total demand. The volumes are based on observed water savings when a TUB was imposed in the drought of 2025 and include savings from voluntary initiatives. It is not possible to disaggregate savings as prior to imposing a TUB we will be requesting voluntary reductions in the use of hosepipes, and many customers will start to make savings ahead of the ban.

Savings from restrictions of non-essential use (Drought Order restrictions)

Potential water saving due to restrictions of non-essential use are based on estimated savings and assumptions presented in the *Code of Practice for Water Companies on Water Use Restrictions* (UKWIR, 2023).

Analysis we carried out during the 2025 drought suggested savings from a NEUB could be between 3.4 and 6.3 Ml/d (around 0.5% of total demand). This approximate range of savings was based on those outlined in legislation and the Drought CoP. The range is dependent on assumptions made in relation to non-public swimming pools and car washes where the level of exceptions or customer representations are uncertain, e.g. exceptions are required to be granted to non-public swimming pools which are used for school lessons and car washes may be granted an exception if customer representations indicates severe financial hardship. The lower figure is where exceptions are granted to a greater degree for these sectors whereas the higher figure indicates no exceptions.

NEUBs are considered at drought Level 3a and a cost-benefit analysis will be carried out to support the decision. If there is a risk of a NEUB we will initiate appeals to non-households and direct engagement with industry and public sector bodies requesting voluntary reductions in non-essential use.

[2] https://www.yorkshirewater.com/media/hqipwq0e/copy-of-yorkshire-water-wrmp24_wrp-tables_v70_public.xlsx

Action Name	Temporary Use Bans (TUB)	Non-essential Use Ban (NEUB)
Action Description	Temporary use ban as defined section 76 of the Water Industry Act 1991, as substituted by section 36 of the Flood and Water Management Act, and detailed in the Water Use (Temporary Bans) Order 2010.	Prior to a NEUB, make appeals to non-households and directly engage with industry and public sector bodies to request voluntary reductions in non-essential use. Restrictions on non-essential use as defined Sections 73 to 81 and Schedules 8 and 9 of the Water Resources Act 1991 and detailed in the Drought Direction 2011.
Implementation Timetable	Notices will be published in newspapers ahead of any ban starting, including details on how to make representations. Although there is no statutory notice period, we aim to provide at least 72 hours' notice before implementing a TUB. There is no legal limit on the period of applying restrictions.	The implementation period is estimated to be 5-6 weeks (allowing for advertisement, representation, inquiry, granting). Notice period would be a minimum of 72 hours in line with the legal requirement. Drought orders are typically granted for 6 months although companies can apply to extend this.
Trigger and Drought Level for Action	Considered when regional reservoir stocks enter level 2.	Considered when regional reservoir stocks enter level 3a and subject to cost-benefit analysis, prevailing weather conditions and drought prospects.
Estimated Demand Savings	Increases savings up to 5% reduction in DI. Savings are inclusive of the impact of voluntary calls for restraint, water saving	Increases total savings to up to 5.5% of DI. Savings are inclusive of the impact of voluntary calls for restraint, water saving

Action Name	Temporary Use Bans (TUB)	Non-essential Use Ban (NEUB)
	initiatives, leakage control and pressure management.	initiatives, leakage control, pressure management and a temporary use ban.
Location/ Area Affected	Whole supply area.	Dependent on extent of drought.
Engagement with NAVs and / or Water Retailers	If our forecasts show a TUB could be triggered, we will inform NAVs and retailers who we will already be engaging with on the drought situation. Prior to notifications being published we will provide NAVs and retailers with information to help them answer any queries they may receive from their own customers in the Yorkshire area who will be required to comply with the restrictions.	If our forecasts show a NEUB could be triggered, we will inform NAVs and retailers who we will already be engaging with on the drought situation. Prior to notifications being published we will provide NAVs and retailers with information to help them answer any queries they may receive from their own customers in the Yorkshire area who will be required to comply with the restrictions.
Period or time of year implemented	1st April to 30th September.	Activity is available at any time of year but potentially more benefit in the summer months.
Permissions or Constraints	Section 76 of The Water Industry Act 1991 sets out that a TUB can be used if a company "thinks that it is experiencing, or may experience, a serious shortage of water for distribution.".	Sections 73 to 81 and schedules 8 and 9 of the Water Resources Act 1991 provide for ordinary drought orders. This requires that "by reason of an exceptional shortage of rainfall, a serious deficiency in the supplies of water in any area exists or is threatened."

Action Name	Temporary Use Bans (TUB)	Non-essential Use Ban (NEUB)
		DEFRA can grant an ordinary drought order following application by the company (and public inquiry if necessary). Supporting information should include a cost-benefit analysis.
Risk Assessment	Do not provide a fixed benefit and savings are difficult to disaggregate from variations in use due to weather patterns and behaviour. Savings may be low if customers already reducing use voluntarily. Conversely could have adverse effect leading to increased water use after notification of implementation and before the ban starts.	Greater uncertainty over a NEUB than other measures as infrequently used. Savings may be low if non-households already reducing use voluntarily from Level 1 onwards. Ordinary drought order applications should include a cost-benefit analysis – this can take time to produce, data is limited and the 2025 UKWIR report 'Assessing the costs and benefits of nonessential use Drought Orders – A Feasibility Study' notes further work is needed to develop an approach.

Table 3 TUB and NEUB restriction on use

Supply-side drought options

Supply-side activity on crossing the normal control line and throughout a drought includes reviewing available resources and asset performance to ensure we optimise use of available resources to meet demand and where possible preserve stocks that may be required if the situation continues. We will also consider how our normal operations can be altered to help protect the environment, for example, provide alternative compensation releases to rivers.

We monitor and assess our borehole yields to ensure there is no loss in deployable output or if there is plan to remedy any losses. Where opportunity arise we will look to update deployable output values.

At times our assets can be out of service either for scheduled maintenance and repairs or as a result of unplanned events such as pollution or asset failure. This can lead to a temporary loss of supply known as an outage. Due to the connectivity within our supply network under normal operations the supply may not be required. However, during extreme weather events, we may need to maximise available supplies in order to redistribute resources and meet high demands. Outage events will be continuously assessed during dry weather to understand the impact on our system. We will, where there is a benefit and it is safe and feasible, reschedule planned events and escalate maintenance and repairs to bring assets back into supply.

Our supply-side actions to alter abstraction and impounding permission are categorised as level 2/3a[3]. These require authorisation through granting of a drought permit or ordinary drought order.

When we implement these supply-side drought options we will have, where possible, maximised available resources within licence conditions and enhanced our water efficiency communications and leakage activity. During April to October a temporary use ban will be in place.

The decision on which orders or permits to apply for would be made in consultation with the EA and other interested parties. The decision would depend on the severity of the drought, and which areas of our region were most impacted. The environmental impacts of the options are discussed in Section 6 of our main Drought Plan. Where possible we will prioritise actions where the

[3] The DPG2025 categorises drought permits and orders with minor environmental impacts as level 2 actions and those with moderate to major as level 3a actions. The majority of our actions would be level 3a.

environmental impact would be least damaging or, in the case of compensation related actions, where resources need to be conserved as there is a risk of running out of water for supply and/ or compensation flow.

Our drought plan also includes extreme drought actions that would be implemented at level 3b. These are listed in Appendix 5.6 and we provide further information in Appendix 6.

Savings from supply-side options

The drought savings for individual supply-side actions are stated in Appendix 5 and based on the change from normal operating conditions.

Reducing compensation water flows

We operate over 100 reservoirs in our region with around 80 of these used to supply water to customers. For many of our reservoirs, we are required to release flow to the downstream environment to compensate for the reduction in flow due to the reservoir impounding the upstream source. These releases are referred to as compensation flows.

Compensation flow requirements are specified in legal documents (Acts of Parliament or licence agreements) that permit the impoundment or abstraction. In a drought, we would consider applying for drought permits or ordinary orders to temporarily reduce compensation releases. By releasing less from the reservoirs, we conserve supplies for customers. This also acts to maintain the compensation flow for longer, at a reduced level.

We operate several reservoirs to provide compensation flows that differ to the legal requirement where it has been agreed with the EA this is better for the environment. These options still require authorisation to temporarily alter the compensation requirements in a drought. The details of which would be explained in the application.

Actions to reduce compensation releases include a reduction to 50% of the normal operating release from the date the permit is implemented. If reservoir levels continue to decline and reservoir stocks have remained in the level 3a band for more than four weeks since the permit was implemented (or as otherwise agreed with the EA), we may implement a second compensation release reduction to one third of the normal operating release.

Under drought conditions we balance supplies to try to ensure stocks in each area of our region are drawn down evenly. However, asset availability and

geographical differences in rainfall can lead to some reservoirs reaching critical levels earlier than others. Some of our reservoirs are linked (either directly or indirectly) to our public water supply network but in a drought, there may be no supply benefit to reducing the compensation release. These reservoirs may still require drought actions to support the downstream environment. If the action was not taken the reservoir would be at risk of running out of water and no compensation flow would be available.

We operate five[4] reservoirs in our region that no longer have links (direct or indirect) to public water supply network. These reservoirs are referred to as 'compensation only' reservoirs. Yorkshire Water is the asset owner and is therefore responsible for the management and operation of the reservoirs, including making, recording and reporting accurate compensation flow releases. For compensation only reservoirs, it is the responsibility of the EA to apply to Defra for a drought order (using Section 73 of the WRA 1991) where it (EA) believes this is necessary to protect the environment.

Although the applications will not be made by Yorkshire Water, as the asset owner, we have undertaken the environmental assessments, Habitats Regulations Assessment (HRA), Strategic Environmental Assessment (SEA) and Environmental Assessment Reports (EARs) required for these reservoirs and included the environmental assessment requirements in our SEA and HRA documents. We have also included these reservoirs in Appendix 5 as EA drought order sites.

Increasing existing abstraction licences

It may be possible to gain additional water through increasing our existing abstractions. We have five level 2 / 3a supply-side options that would increase river abstractions to provide additional water during a drought. We would require an ordinary drought order or drought permit before we could implement these actions.

Three of these supply-side actions would temporarily increase the daily permitted abstraction volume. One would increase the total volume we are permitted to abstract in a year and is only effective in winter (see below). We also have a river related option to alter a regulating release from a reservoir which conserves water to support the abstraction. These level 2 / 3a actions are applied

[4] Pending the formalisation of North West Area Reservoir 1a and, after which North West Area Reservoir 2 and 3 will become compensation only reservoirs

to existing sources of supply and do not require any additional permissions from the Drinking Water Inspectorate (DWI) or planning authorities.

Our experience in 1995-1996, 2018, 2022 and 2025 shows the potential for increasing groundwater supplies of potable water during a drought is limited by treatment capacity and mains infrastructure. We therefore have limited supply-side groundwater actions. It may be possible to reinstate any boreholes that are out of service due to contamination through borehole refurbishment and additional treatment processes. This will be considered at level 1 when we look to maximise our existing abstraction permissions. We also have a number of borehole sources included as extreme drought options (see Appendix 5).

Winter drought permits/orders

In a drought, we may apply for supply-side drought permits/orders in winter (October to March) as well as summer. In winter we would apply if our reservoirs were lower than average, and our water resource modelling predicts supply-side actions will help reservoir recovery and reduce the likelihood of drought permits being required in the next spring or summer, when the environmental impacts are often greater.

We have one option, the River Derwent, that is a winter only drought action and requires a drought permit. All other supply-side drought options requiring authorisation could be required at any time in the year.

The licensing year for the River Derwent is from 1 April to 31 March and in most years, we control the volume we take each day to ensure we do not reach the annual limit. The River Derwent drought action does not increase the total aggregated annual abstraction volume. The drought option would allow a temporary increase in the annual abstraction limit from the River Derwent at Loftsome Bridge that would be balanced by a corresponding reduction in the annual limit from the River Derwent at Elvington. However, the need would be linked to use in the summer months when high demands meant we used a higher proportion of our permitted annual abstraction volumes than in a normal year. This is considered a level 2 drought action as the environmental impacts are negligible.

Inter-company bulk transfers

The Yorkshire Water region is bordered by four water companies: Anglian Water, Severn Trent Water, United Utilities and Northumbrian Water. We maintain a routine dialogue with each of these companies and in the event of drought would

contact the relevant company water resource managers regarding their water supply situation and options for cross border support. The opportunities for support between Yorkshire Water, Anglian Water and United Utilities are currently minimal.

To meet the deficit forecast in our WRMP24 we include a new bulk transfer from Northumbrian Water as part of our solution. This is a large scheme requiring significant planning and investment over a number of years and could not be escalated in drought conditions.

Severn Trent Water bulk supply agreement

The amount that can be taken by both Yorkshire Water and Severn Trent Water is set in operating guidelines based on the principal that we are entitled to 24.1 per cent of the available water (a maximum of 245Ml/d). However, we cannot take more than 21,550Ml per calendar year, which is 59Ml/d on average.

In operating the supply, we use five control lines, taking different amounts from the reservoirs depending on the time of year and the reservoir stocks. As reservoir stocks decline the volume both parties can take under the terms of the agreement reduces as shown in Figure . The import feeds a WTW in South Yorkshire that has a minimum throughflow of 35Ml/d. This aligns to Yorkshire Water's and Severn Trent's WRMP24s for the import.

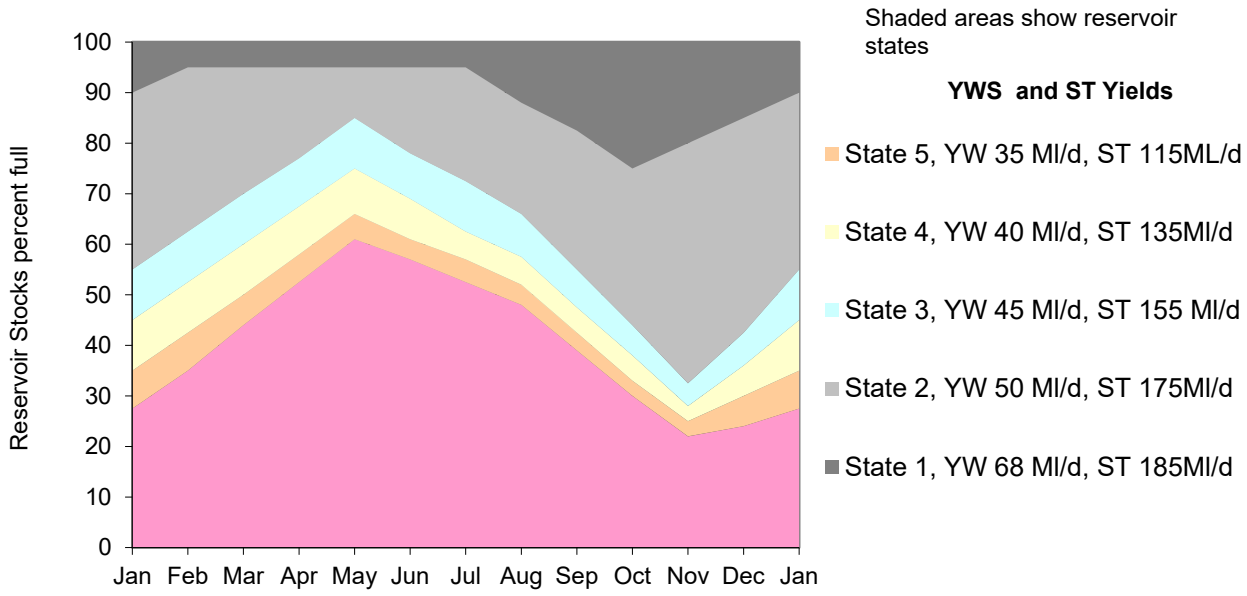

Figure 6 Bulk Supply Agreement Control lines and volumes

NAV bulk transfers

Our agreements with the NAVs operating in our supply area are for annual maximum volumes that cannot be varied in drought conditions. A breakdown of the NAVs and volumes is provided in Table 4.

	Ml/annum	Ml/d
AWIN	258	0.71
ESP	807	2.21
IWNL	4449	12.19
Last Mile	1643	4.50
Leep	420	1.15
Matrix	171	0.47
TOTAL	7748	21.23

Table 4 Contractual Bulk Transfer Volumes for NAVs

Appendix 4.2: Drought permit and order application process

Table 5 describes the application process for drought permits which apply to supply options only and for ordinary drought orders which apply to supply and demand (NEUB) options.

<table>
<tr><th></th><th>Drought permit</th><th>Drought order</th></tr>
<tr><td rowspan="2">Pre-application</td><td colspan="2">We will notify relevant authorities (such as Defra, the Environment Agency, retailers, NAVs, navigation authorities and Natural England) of our intention to submit a drought permit or order application. We may need to apply for additional consents e.g. navigation authority consent, land drainage consents, an environmental permit, planning permission.</td></tr>
<tr><td>We will update our environmental reports and submit a draft to the EA alongside a draft of the proposed drought permit and copies of the existing licences and Acts. The submission will also include a copy of the draft public notice, and a list of the specified bodies we propose to serve notice to. It will also include the draft supporting permit application documentation with information on the proposal description, evidence of Exceptional Shortage of Rain (ESOR), leakage, outage and evidence the drought plan has been followed.</td><td>We will update our environmental reports and submit a draft to the EA for review (to be able to advise Defra on the validity of our application). This will include the draft supporting order application documentation with information on the proposal description, evidence of exceptional shortage of rain (ESOR), leakage, outage and evidence the drought plan has been followed. It will also include a copy of the draft public notice and a list of the specified bodies we propose to serve notice to.</td></tr>
<tr><td rowspan="2">Submission</td><td>Submit to the Environment Agency</td><td>Submit to Defra</td></tr>
<tr><td colspan="2">The application will include:
Evidence of eligibility for the application including an explanation of why we need the permit/order and evidence of exceptional shortage of rainfall</td></tr>
</table>

	Drought permit	Drought order
	• A description of how we'll use the permit/order, location map(s) and a completed environmental report • A draft of the proposed drought permit/order • Copies of any written consents relating to the application and any relevant existing abstraction licences and discharge permits • Details of demand management activity we've carried out prior to the application and any observed/ expected savings • Comments from anyone we have already consulted • Information on the timings, publicity activities and how we'll work with interested parties • Other options considered and risks if the permit is refused • A list of the proposed monitoring and mitigation we intend to undertake during the period the permit will be in force • An executive summary of the main points using non-technical language.	
Notice	We will send written notification of the application to: • The Environment Agency • Local authorities responsible for areas affected by the permit/order or with sources in the areas affected • The internal drainage boards with sources in the area affected • Other water undertakers and abstractors operating in the area affected including water companies, NAVs and retailers • Organisations protected by a statutory requirement (e.g. for compensation water) that the permit/order suspends or modifies	

	Drought permit	Drought order
	• Navigational authorities responsible for any watercourse affected by the order.	
	The notice will: • State the effects of the permit • Identify the land the application relates to (if the permit authorises the occupation and use of land) • State that all relevant maps or plans can be inspected free of charge for a period of 7 days from the date the notice is served • State that objections to the application should be made within 7 days of the notice being served.	
Advertisement	We will advertise drought permit and order applications in one or more local newspapers circulating in the area affected by the permit and in the London Gazette. A complete copy of drought permit or order applications will be made available, free of charge, for inspection by anyone for 7 days from the date it is advertised. It will be made available at each of the following: • An appropriate place (such as a local Post Office), no more than 8km by road (or as near as possible in remote areas) from either the point of abstraction or the point of compensation discharge • The Yorkshire Water head office in Bradford and the office most local to the relevant area • The Environment Agency local office.	
Objections	Objections to be sent to the Environment Agency: Water Resources Permitting Support Centre Environment Agency Quadrant 2 99 Parkway Avenue Parkway Business Park	Objections to be sent to Defra: Department for Environment, Food and Rural Affairs Water Resources Policy Seacole 3rd Floor 2 Marsham Street London

	Drought permit	Drought order
	Sheffield S9 4WF psc-waterresources@environment-agency.gov.uk	SW1P 4DF water.resources@defra.gov.uk
	The Environment Agency / Defra will send Yorkshire Water copies of any objections it receives, and we will aim to resolve or mitigate the issues and reach an agreement with the objector(s).	
Withdrawal	If we decide to withdraw a drought permit or order application, we will: • Notify Environment Agency/ Defra by telephone and in writing • Send out a press release on the decision to withdraw • Notify anyone who objected to the application.	
Decision	On receipt of application the Environment Agency will aim to provide a decision within 12 calendar days of the date of our last advertisement, if no objections are received or all objections are resolved, and we have identified the permit application in the Yorkshire Water Drought Plan.	Defra will provide a decision on a drought permit application within 28 days, if there are no objections or complications. Defra will inform with the Environment Agency and anyone who objected.
Hearing or public inquiry	If we are not able to resolve objections a hearing or public inquiry will take place where an objection is 'duly' made. Objectors can give evidence or ask questions at a hearing or public inquiry that may be organised virtually or in-person. If there's an urgent need for a drought permit or order, the Secretary of State may decide that a hearing or public inquiry needn't go ahead. This would only be permitted in extreme cases.	
	A hearing can take place any time after the 7-day limit for lodging objections. The Environment Agency will	Defra may hold a hearing or inquiry whether or not objections are made. Defra will appoint someone to hold

	Drought permit	Drought order
	appoint someone to run the hearing, arrange a suitable venue and notify all parties of the date, time and venue. They will usually provide 7 days' notice, though this may be shortened in more urgent cases. We will send the objectors a statement of reasons for making the application including any documents, maps or plans that we will use in the hearing. We will contact the objectors to ensure the production of a jointly agreed 'statement of fact' that will be sent to the Planning Inspector in advance of the hearing. The Environment Agency aim to make a decision within 7 calendar days of the receipt of the hearing report, though this period can be longer or shorter.	the hearing or inquiry, and Yorkshire Water will arrange a venue for the hearing or inquiry and inform Defra, Defra will then inform all interested parties of the date, time and location (hotel, town hall, Yorkshire Water office). We will contact the objectors to ensure the production of a jointly agreed 'statement of fact' that will be sent to the Planning Inspector in advance of the hearing. Defra will make a decision on the drought order and inform Yorkshire Water if the application is successful or not. Normally, Defra expects to issue their decision 7 calendar days after receipt of the Inspector's report.

Table 5 Drought permit and drought order application process

Appendix 4.3: Code of practice and water use restrictions in a drought

A UK Water Industry Research (UKWIR) project has been carried out to provide a voluntary Code of Practice (CoP) and guidance to water companies in England and Wales. This was originally published in *2013 and* incorporated lessons from the 2011–12 drought and was revisited in 2023 to incorporate lessons learnt from the 2022 drought. The COP[5] contains principles and actions to follow when evaluating when and how water use restrictions will be implemented to manage demand during times of drought.

In alignment with the CoP, we will act in accordance with four principles when considering whether and how we will implement water restrictions:

- Principle 1: Ensure a consistent and transparent approach
- Principle 2: Ensuring that water user restrictions are proportionate
- Principle 3: Communicate clearly with customers and the wider public/users
- Principle 4: Consider representations in a fair way.

We will also follow the agreed actions when evaluating how restrictions will be implemented:

- Action 1: Water companies, retailers, regulators, NAVs and government to work together
- Action 2: Coordinate communications
- Action 3: Adopt a common phased approach, considering socio-economic factors
- Action 4: Adopt a common approach to exceptions
- Action 5: Promote understanding and good practice.

[5] UK Water Industry Research – Managing through drought: Code of practice and guidance for water companies on water use restrictions – 2023 (incorporating lessons from the 2022 drought) (Report Ref No. 23/WR/02/19)

Table 6 shows how our plan aligns with the five actions set out in this Code of Practice.

Action from Code of Practice	How we have addressed this in our plan
Action 1: Water companies, NAVs, retailers, regulators and government to work together	We describe how we work with regulators, water companies and other sectors regionally in section 1.3 of our drought plan. We show how we work together with NAVs, retailers and Government (for example as part of the national drought group) in sections 5.2 and 5.5 of our main drought plan. Section 5.2.1 specifically discusses how we work closely with NAVs and retailers, for example through the Retailer Wholesaler Group (RWG).
Action 2: Coordinate communications	Section 5.5 of our main plan describes how we coordinate our communications before, during and after a drought. This section of our plan considers regional and national coordination.
Action 3: Adopt a common phased approach, considering socio economic factors	Our plan uses the common phased restrictions set out in the CoP as demonstrated in section 3.2 and 4.3 of the drought plan and in Appendix 4. This shows that voluntary calls for restraint precede a TUB, which precede a NEUB, which precedes extreme (level 3b) options, which precede emergency drought orders. The socio-economic considerations embedded in the CoP have informed our approach, and by aligning with this, including our exceptions policy, we ensure these factors are fully accounted for.
Action 4: Adopt a common phased approach to TUB and drought order exceptions	As set out in in section 3.2.4 the exceptions we propose to use in our plan align exactly with those in the CoP. We would grant all of the statutory and non-statutory exceptions in Appendix 4.3.
Action 5: Promote understanding and good practice	One of the examples of good practice in the CoP is to provide online year-round updates on water resources. As described in section 1.5.2 of our drought plan we do this through our Water situation or (Watsit) report. Also, as recommended for action 5, we provide information and advice regarding water efficiency for household and commercial customers on our website.

Table 6 How we have addressed the Code of Practice actions

Exceptions

The CoP aligns with the restrictions defined by legislation. Action 4 within the CoP requires all water companies to adopt a common approach to exceptions on

any restrictions imposed during a drought. To allow this a number of exception categories have been agreed:

- Statutory exceptions: these are activities / water uses specified in the legislation which are exempt from restrictions imposed by temporary use bans and a demand-side ordinary drought order and for which customers do not need to make representation to obtain permission.

- Non-statutory exceptions: these are described below using text taken from UKWIR Drought CoP 2023.

Non-statutory exceptions cover activities, or water uses which are not subject to a statutory exception but ones that water companies have decided to grant under certain circumstances. Non-statutory exceptions can be split into two different categories:

'Common' – these exceptions are offered by all companies who follow the Drought CoP. Such exceptions do not require customers to write or make any representation to the water company to obtain permission; and

'Bespoke' – these are exceptions which individual water companies may like to offer its customers depending on its particular circumstances. It is at the discretion of each company if a customer is required to make a representation to receive an exception.

When we impose a TUB and a NEUB, statutory exceptions, associated with individual purposes of use, will automatically be in place. Our plan is to align with all statutory and non-statutory exceptions (common and bespoke) in the CoP. We do not require customers to make any representations to agree these exceptions.

Notifications we publish on a TUB and a NEUB will state the purposes of use that are restricted, and all exceptions related to each purpose. The notifications will include details on where to send representations, and we will consider any received.

Representations are likely to include requests for further exceptions. Exceptions will include people who are disabled or otherwise physically impaired. They could also include businesses whose commercial activity would be unduly affected by the imposition of a NEUB. Before imposing a TUB and a NEUB we will review our exceptions, taking into account all representations. However, if a drought progressed to level 3b non-statutory exceptions could be withdrawn to further

reduce demand. Details on TUB and NEUB categories of use and exceptions are provided in Table 7 to Table 18 (source: UKWIR 2023 Code of Practice).

TUB category of use	Affected area / activity	Statutory Exception
Watering a garden using a hosepipe	Areas defined as "a garden"	Using a hosepipe to water a garden for health or safety reasons. NB For clarity: in this category, the definition of "a garden" includes "an area of grass used for sport or recreation". Therefore it should be noted that watering areas of grass, which are used for sport or recreation, is covered by a Statutory Exception for health & safety only in relation to the active strip/playing area, not the entire ground.
Cleaning a private motor-vehicle using a hosepipe	Vehicles defined as a "private motor-vehicle"	(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**)
Watering plants on domestic or other non-commercial premises using a hosepipe	Premises defined as "domestic or other non-commercial premises"	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.
Cleaning a private leisure boat using a hosepipe	Boats defined as a "private leisure boat"	(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
Filling or maintaining a domestic swimming or paddling pool	Pools defined as a "domestic swimming or paddling pool"	(1) filling or maintaining a pool where necessary in the course of its construction (2) filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap (3) filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment (4) filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease (5) filling or maintaining a pool used in the course of a programme of veterinary treatment (6) filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity
Drawing water, using a hosepipe, for domestic recreational use	Drawing water, using a hosepipe, to operate water slides or other recreational equipment	None

Table 7 TUB Statutory Exceptions for categories of water use in the Water Use (Temporary Bans) Order 2010 (Source: UKWIR Managing through drought - code of practice and guidance on water use restrictions – 2023)

TUB category of use	Affected area / activity	Statutory Exception
Filling or maintaining a domestic pond using a hosepipe	Water bodies defined as a "domestic pond"	Filling or maintaining a domestic pond in which fish or other aquatic animals are being reared or kept in captivity
Filling or maintaining an ornamental fountain	Structures defined as 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
Cleaning walls, or windows, of domestic premises using a hosepipe	The category of use in Section 76(2)(i) of the Act applies only to the cleaning of the *external* walls or windows of domestic premises.	Using a hosepipe to clean the walls or windows of domestic premises for health or safety reasons
Cleaning paths or patios using a hosepipe	Clean paths or patios	Using a hosepipe to clean paths or patios for health or safety reasons
Cleaning other artificial outdoor surfaces using a hosepipe	Areas falling into the definition of "artificial outdoor surface"	Using a hosepipe to clean an artificial outdoor surface for health or safety reasons

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

Statutory			Non-Statutory	
Exception	**Sub category**	**HH / NHH**	**Common**	**Bespoke**
			A hosepipe can be used to water standard trees in urban settings (such as streets) planted in the last three years that cannot reasonably be hand-watered or watered with non-potable water. (A 'standard' tree is a tree with a single stem with clear trunk (no side branches) for at least 1.8m above the ground.)	

Table 8 Non-Statutory Exceptions – TUB category of use: watering a garden with a hosepipe

Statutory			Non-Statutory	
Exception	**Sub category**	**HH / NHH**	**Common**	**Bespoke**
(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	Vulnerable customers	HH	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
	Boats	HH	A hosepipe can be used for filling a water tank in a boat where the water is to be used for washing, cooking or sanitation purposes. A hosepipe can be used for commercial cleaning. A hosepipe can be used to clean vessels that are a primary residence. A hosepipe can be used to clean boats where fouling is causing increased fuel consumption. A hosepipe can be used on engines that are designed to be cleaned with a hosepipe. A hosepipe can be used to prevent or control the spread of non-native and/or invasive species where other means are not appropriate.	None

Table 9 TUB Non-Statutory exceptions - TUB category of use: Watering plants on domestic or other non-commercial premises using a hosepipe

Statutory			Non-Statutory	
Exception	**Sub category**	**HH / NHH**	**Common**	**Bespoke**
(1) filling or maintaining a pool where necessary in the course of its construction (2) filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap (3) filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment (4) filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease (5) filling or maintaining a pool used in the course of a programme of veterinary treatment (6) filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity	Vulnerable customers	HH	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
	Domestic swimming pool, paddling pool, swim spa, exercise spa	HH	A hosepipe can be used when filling a swimming pool, paddling pool, swim spa or exercise spa that is a fixed structure from empty after construction or significant refurbishment. In this case significant refurbishment should be treated as equivalent to construction. Once it has been refilled then a hosepipe cannot be used for any subsequent filling.	None
	Pool with religious significance	NHH	A hosepipe can be used for pools within places of worship or community pools when they are used as part of a religious ceremony.	None

Table 10 TUB Non-Statutory Exceptions – TUB category of use: Cleaning a private leisure boat using a hosepipe

Statutory			Non-Statutory	
Exception	**Sub category**	**HH / NHH**	**Common**	**Bespoke**
None	Vulnerable customers	HH	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
	Hot tubs	HH	A hosepipe can be used when filling a hot tub that is a fixed structure from empty after construction or significant refurbishment. In this case significant refurbishment should be treated as equivalent to construction. Once it has been refilled then a hosepipe cannot be used for any subsequent filling. All other uses for hot tubs are not permitted.	None
	Caravan or motorhome	HH	A hosepipe can be used for filling a water tank in a caravan or motorhome where the water is to be used for washing, cooking or sanitation purposes.	None

Table 11 TUB Non-Statutory Exceptions – TUB category of use: Filling or maintaining a domestic swimming or paddling pool

Statutory			Non-Statutory	
Exception	**Sub category**	**HH / NHH**	**Common**	**Bespoke**
Filling or maintaining a domestic pond in which fish or other aquatic animals are being reared or kept in captivity	Vulnerable customers	**HH**	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None

Table 12 TUB Non-Statutory Exceptions – TUB category of use: Drawing water using a hosepipe for domestic recreational use

Statutory			Non-Statutory	
Exception	**Sub category**	**HH / NHH**	**Common**	**Bespoke**
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	Vulnerable customers	HH	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None

Table 13 TUB Non-Statutory Exceptions – TUB category of use: Filling or maintaining a domestic pond using a hosepipe

Statutory			Non-Statutory Exceptions	
Exception	**Sub category**	**HH / NHH**	**Common**	**Bespoke**
Using a hosepipe to clean the walls or windows of domestic premises for health or safety reasons	Vulnerable customers	HH	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
	Non-mains connection	HH	A hosepipe can be used where cleaning apparatus is not connected to mains supply. Electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions.	None
	Graffiti	HH	None	A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive, as this links to the statutory H&S exception.
	Cleaning by a business or commercial enterprise	HH / NHH	A hosepipe can be used to clean the walls and windows of domestic premises where this is done by a business as a service to customers. NB For clarity: the use of water-fed poles by commercial cleaners for window cleaning at height is permitted under the H&S Statutory Exception. The domestic use of a water-fed pole is not permitted under TUB.	None

Table 14 TUB Non-Statutory Exceptions – TUB category of use: Filling or maintaining an ornamental fountain

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

Table 15 TUB Non-Statutory Exceptions – T UB category of use: Cleaning paths or patios using a hosepipe

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

Table 16 TUB Non-statutory exceptions - TUB category of use: Cleaning other artificial outdoor surfaces using a hosepipe

Table C.4 - Statutory Exceptions for categories of water use in the Drought Direction 2011

Drought Order Purpose of Use	Affected area / activity	Statutory Exceptions
Purpose 1: watering outdoor plants on commercial premises	Watering the following plants on commercial premises using a hosepipe: (a) plants which are in a pot or other container that is outdoors or under cover; (b) plants which are in the ground under cover.	The purpose specified does not include watering plants that are: (a) grown or kept for sale or commercial use; or (b) part of a National Plant Collection or temporary garden or flower display
Purpose 2: filling or maintaining a non-domestic swimming or paddling pool	Filling or maintaining a swimming or paddling pool other than a domestic swimming or paddling pool within the meaning of Section 76(2)(e) of the Act(**a**).	The purpose does not include: (a) filling or maintaining a pool that is open to the public; (b) filling or maintaining a pool where necessary in the course of its construction; (c) filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap; (d) filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment; (e) filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease; (f) filling or maintaining a pool that is used in the course of a programme of veterinary treatment; (g) filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity; (h) filling or maintaining a pool that is for use by pupils of a school for school swimming lessons. For the purposes of paragraph 3(2)(a), a pool is not open to the public if it may only be used by paying members of an affiliated club or organisation.
Purpose 3: filling or maintaining a pond	A non-domestic pond; or a domestic pond within the meaning of Section 76(2)(g) of the Act(**b**)	The purpose does not include: (a) filling or maintaining a pond in which fish or other aquatic animals are being reared or kept in captivity; (b) filling or maintaining a pond using a hand-held container which is filled with water drawn directly from a tap. The purpose specified in sub-paragraph (1)(b) does not include filling or maintaining a domestic pond using a hosepipe.

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Drought Order Purpose of Use	Affected area / activity	Statutory Exceptions
Purpose 4: operating a mechanical vehicle-washer	Operating a mechanical vehicle- washer, whether automatic or not	None
Purpose 5: cleaning any vehicle, boat, aircraft or railway rolling stock	Cleaning any vehicle, boat, aircraft or railway rolling stock using a hosepipe	Cleaning any vehicle, boat, aircraft or railway rolling stock for health or safety reasons
Purpose 6: cleaning non-domestic premises	Cleaning any of the following using a hosepipe: (a) any exterior part of a non-domestic building other than a window; (b) a non-domestic wall	Cleaning of any exterior part of a non-domestic building or a non-domestic wall for health or safety reasons
Purpose 7: cleaning a window of a non-domestic building	Cleaning a window of a non-domestic building using a hosepipe other than for health or safety reasons	Cleaning a window of a non-domestic building using a hosepipe for health or safety reasons
Purpose 8: cleaning industrial plant	Cleaning industrial plant using a hosepipe other than for health or safety reasons	Cleaning industrial plant using a hosepipe other than for health or safety reasons
Purpose 9: suppressing dust	Suppressing dust using a hosepipe other than for health or safety reasons	Suppressing dust using a hosepipe other than for health or safety reasons
Purpose 10: operating cisterns	Operating a cistern in any building that is unoccupied and closed	None

Table 17 Non-essential use drought order categories and exceptions.

Drought Order Purpose of Use	HH/NHH	Statutory Exception	Non-Statutory Exceptions	
			Common	Bespoke
Purpose 1: watering outdoor plants on commercial premises	NHH	The purpose specified does not include watering plants that are: (a) grown or kept for sale or commercial use; or part of a National Plant Collection or temporary garden or flower display	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	i) A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or ii) A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register.
Purpose 2: filling or maintaining a non- domestic swimming or paddling pool	NHH	The purpose does not include: (a) filling or maintaining a pool that is open to the public; (b) filling or maintaining a pool where necessary in the course of its construction; (c) filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap; (d) filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment; (e) filling or maintaining a pool that is used for the purpose of decontaminating animals from infections or disease; (f) filling or maintaining a pool that is used in the course of a programme of veterinary treatment; (g) filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity; (h) filling or maintaining a pool that is for use by pupils of a school for school swimming lessons. For the purposes of paragraph 3(2)(a), a pool is not open to the public if it may only be used by paying members of an affiliated club or organisation.	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. - Swimming pools serving industrial training if considered justified; - Pools with religious significance; - Pools fitted with approved water conservation or recycling systems; - Pools that are subject to significant repair and renovation, defined as: "Pool renovations are classified as alterations that require substantial changes to the shape of a pool or major additions to the structure around

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Drought Order Purpose of Use	HH/NHH	Statutory Exception	Non-Statutory Exceptions	
			Common	Bespoke
				the pool. These are treated as new pools. Activities such as retiling or resurfacing existing pools are not classed as renovations.
Purpose 3: filling or maintaining a pond	HH/NHH	The purpose does not include: (a) filling or maintaining a pond in which fish or other aquatic animals are being reared or kept in captivity; (b) filling or maintaining a pond using a hand-held container which is filled with water drawn directly from a tap. The purpose specified in sub-paragraph (1)(b) does not include filling or maintaining a domestic pond using a hosepipe.	None	None
Purpose 4: operating a mechanical vehicle-washer	HH/NHH	None	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. - On grounds of biosecurity to prevent disease causing agents entering or leaving any place where they can pose a risk.
Purpose 5: cleaning any vehicle, boat, aircraft or railway rolling stock	HH/NHH	Cleaning any vehicle, boat, aircraft or railway rolling stock for health or safety reasons	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. - Small commercial operators whose business partially or wholly depends on work involving

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Drought Order Purpose of Use	HH/NHH	Statutory Exception	Non-Statutory Exceptions	
			Common	Bespoke
				the washing of private recreational craft or valeting using hosepipes - Those using vessels as a primary residence, which should be subject to the same constraints as any other domestic customer when restrictions are imposed - Cases in which the fouling of hulls is causing increased fuel consumption by the drag created; - A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive; and - To prevent or control the spread of non-native and/or invasive species.
Purpose 6: cleaning non-domestic premises	NHH	Cleaning of any exterior part of a non-domestic building or a non-domestic wall for health or safety reasons	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. - Small businesses whose sole operations are cleaning of non-domestic buildings using hosepipes; - Low water use technologies; and - A hosepipe can be used as part of the process of removing graffiti

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			Non-Statutory Exceptions	
Drought Order Purpose of Use	**HH/NHH**	**Statutory Exception**	**Common**	**Bespoke**
				from domestic premises when the graffiti is a hate crime, insulting or offensive
Purpose 7: cleaning a window of a non- domestic building	NHH	Cleaning a window of a non-domestic building using a hosepipe for health or safety reasons	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. - Businesses involved in cleaning windows in non-domestic premises using water-fed poles or similar. An alternative (non-potable) water source
Purpose 8: cleaning industrial plant	NHH	Cleaning industrial plant using a hosepipe other than for health or safety reasons	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register. - A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive
Purpose 9: suppressing dust	HH/NHH	Suppressing dust using a hosepipe other than for health or safety reasons	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue

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Drought Order Purpose of Use	HH/NHH	Statutory Exception	Non-Statutory Exceptions	
			Common	Bespoke
			watering can/bucket safely.	Badge once they have contacted their water company to be added to the Priority Services Register.
Purpose 10: operating cisterns	HH/NHH	None	A hosepipe may be used by customers who are on the Priority Services Register and are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	- A hosepipe may be used by customers who hold a Blue Badge without any need to contact their water company, or - A hosepipe may be used by customers who hold a Blue Badge once they have contacted their water company to be added to the Priority Services Register.

Table 18 Drought Order Non-Statutory Exceptions

Appendix 4.4: Exceptional Shortage of Rainfall Example

To demonstrate an exceptional shortage of rain (ESoR), we would follow the Environment Agency document *Hydrological guidance for the assessment of an Exceptional Shortage of Rain (ESoR).*

This appendix contains an extract from a drought permit application showing the case for an ESoR. It describes full details of events and climatic conditions that have led to the need for the drought permits.

Introduction

In this section, we demonstrate an exceptional shortage of rainfall by analysis of monthly rainfall following the Environment Agency guidance document ('Hydrological guidance for the assessment of an Exceptional Shortage of Rain (ESoR)', 2025). We demonstrate that ESoR has primarily led to a serious risk of deficiency of supplies in our North West (NW) area. The geographical extent and the time period of analysis have been agreed with the local Environment Agency Hydrology (Yorkshire) team.

The following rainfall analysis has been conducted to support our assessment:

- Plots of 2025 rainfall in relation to long term average (LTA) and previous droughts
- Standardised Precipitation Index (SPI)
- Rainfall ranking compared to records starting in 1871
- Calculation of Cunnane plotting position

We also present additional evidence for the following non-rainfall variables:

- River flows
- Reservoir storage
- MORECS Soil Moisture Deficit

In each subsection, we start by showing the requirements as set out by the Environment Agency (ESoR checklist for water companies March 2025 v2.1) in grey boxes. Following such text boxes, we present our approach and analysis in response to those. We have also considered other analyses, such as the use of the Standardised Precipitation and Evaporation Index (SPEI), and will use the most appropriate analyses at the time in consultation with the local Environment Agency.

Rainfall Data

- You must use areal rainfall data for the catchment area of interest.
- In most circumstances, you should use the Environment Agency's HadUK/DRT dataset Data for hydrological areas is provided to water companies monthly. If the Hydrological Areas are not appropriate, then rainfall data can be extracted for a bespoke catchment area from the HadUK/DRT dataset by Environment Agency hydrologists. You must fully explain which dataset has been used and why. Recent data from third party websites may underestimate complete monthly rainfall totals.

The rainfall data used in this assessment was provided by the Environment Agency Hydrology Yorkshire team. The data included is the HadUK v1.2.0.0 monthly totals covering January 1871 to December 2023 (inclusive) and the Environment Agency Daily Rainfall Tool (DRT) monthly totals covering January 2024 to June 2025 (inclusive). The use of the HadUK/EA DRT rainfall data allows analysis of long time series dating back to 1871. The rainfall data covers the catchments of our reservoirs in our NW region that are relevant to this permit application. The geographical extent will be provided and described in greater detail in section 5.4.

- If you have calculated areal rainfall yourself (you are strongly advised to avoid this):
- You will need to demonstrate that your data is of better quality and/or more hydrologically relevant than the HadUK/DRT dataset.
- Set out the limitations of the dataset.
- Your areal rainfall should be calculated in accordance with British Standard BS7843-4:201296. The rain gauges used must be quality controlled, have minimal missing data and be operated in accordance with British Standard.

We can confirm that we have not calculated the areal rainfall data ourselves and have used the data provided by the Environment Agency as explained above.

Period of Analysis

- Determine the start and end point of the period of analysis before starting the assessment. This is the period of the rainfall deficit which is used to support the ESoR case. You should agree the period of analysis with the relevant Environment Agency hydrologist, the Area Drought Coordinator and water company lead.
- The application should be submitted as soon as possible once the need for a Drought Permit has been identified a or as soon as possible. [as written]
- Start of the period of analysis:
- Provide clear evidence (e.g. charts/graphs) of the point at which rainfall is lower than normal.
- Justify how the variables used here are reflective of the water supply situation in the catchment area of interest.
- End of the period of analysis
- Provide clear evidence (e.g. charts/graphs/reference to Drought Plan) that the rainfall deficit has triggered the need for a drought permit.
- Use the latest rainfall data at the point of the application.

The period over which the analysis has been conducted was agreed with the Environment Agency Hydrology Yorkshire team. This drought can be characterised as relatively short but of high intensity compared to previous recorded droughts. As a result, the onset of the exceptional shortage of rainfall was agreed to be February 2025. Although January 2025 has also seen lower than average rainfall in our NW region (see Figure 7), to be consistent with the assessment in our other regions, February 2025 will be the start of the period of analysis for all of our regions. The latest rainfall data up until the point of application has been used in this assessment representing a 5-month period from February to June 2025.

Geographical Extent of Analysis

- Provide justification for the catchment area used in the analysis, this may be one or several of the Environment Agency's hydrological areas, a bespoke catchment or water resources zone.
- Provide evidence of how the rainfall deficit is relevant to the catchment area of the public supply source or the wider integrated water resource zone/subunit of this zone.
- It is recommended that catchments should contain one or more Met Office registered rain gauge located within them.

The geographic extent of the analysis was agreed with the Environment Agency Hydrology Yorkshire team. We have used a bespoke area that covers all reservoir catchments that are included in the North West group of permits. The rainfall has been consistently low across this whole region and therefore there was no need to investigate individual areas separately. Yorkshire Water uses a grid system to balance supplies across the network, therefore the shortage of rainfall in this area is relatively uniformly felt across the Yorkshire Water supply zone.

Technical Rainfall Analysis Methods

- Refer to the Environment Agency's supplementary guidance on drought permits and drought orders, available on request from Water-company-plan@environment-agency.gov.uk
- Use the same rainfall dataset (usually HadUK/DRT) for each analysis method (asset out in the sections above) and the same historic period of record (from 1871)
- 1961 to 1990 should currently be used as the period of record for Long Term Averages (LTA) assessment (this is planned to be updated to 1991 to 2020, and this document will be updated to reflect that)
- Use your assessment period of analysis for each method as your main evidence. If you use any shorter periods as supporting evidence (for example, the winter refill period), you must justify how these are relevant to the water resource situation
- Detail any limitations and uncertainties associated with the methodology, and the possible impacts on the results

Rainfall comparison with the LTA and historical droughts

Figure 7 shows the rainfall during December 2024 to June 2025 in comparison to the monthly long-term averages (LTA). The LTA was calculated using the new 1991-2020 standard period which was confirmed by the Environment Agency Hydrology Yorkshire team to be taken for the calculation of LTA. The rainfall is significantly below average for this time of year, with particularly low rainfall between February to April. Although it can be seen that January 2025 has also seen below average rainfall, it is not part of the period of analysis adopted by Yorkshire Water for two reasons: (1) Yorkshire Water uses a grid system to balance supplies across the network, therefore the shortage of rainfall in the entire area is relatively uniformly felt across the Yorkshire Water supply zone; and (2) In order to be consistent in the assessment of ESoR with other regions (where January 2025 did not have below average rainfall), February 2025 will be the start of the period of analysis.

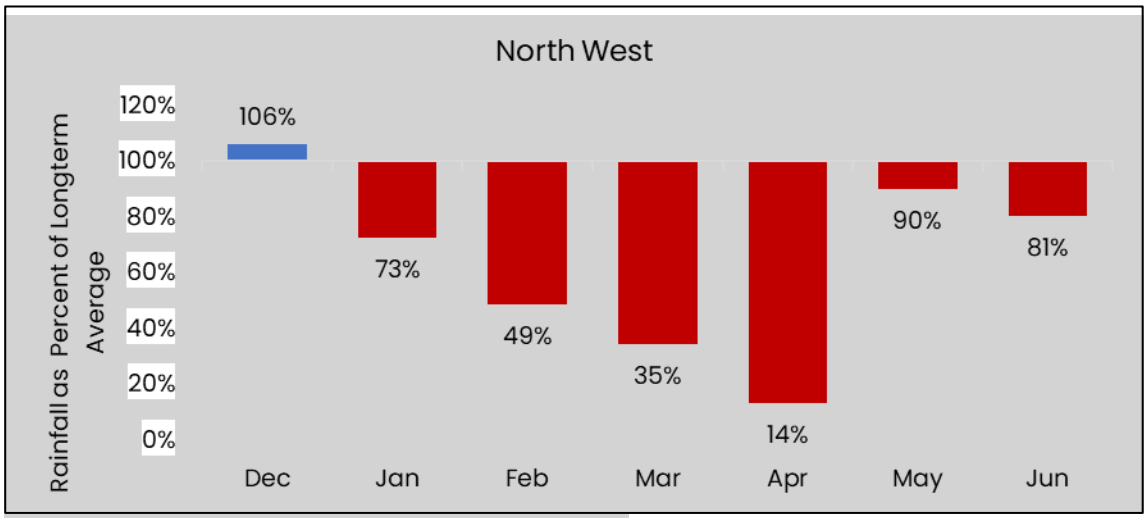


Figure 7 Rainfall compared to long-term average

Figure 8 Shows the cumulative rainfall starting from the end of January for the analysis period in comparison with the LTA and the two most significant recent droughts (2022 and 1995). Rainfall from 2020 is also included as the year was characterised by very low rainfall in the springtime. The rainfall for this period is notably lower than all the historic droughts and LTA.

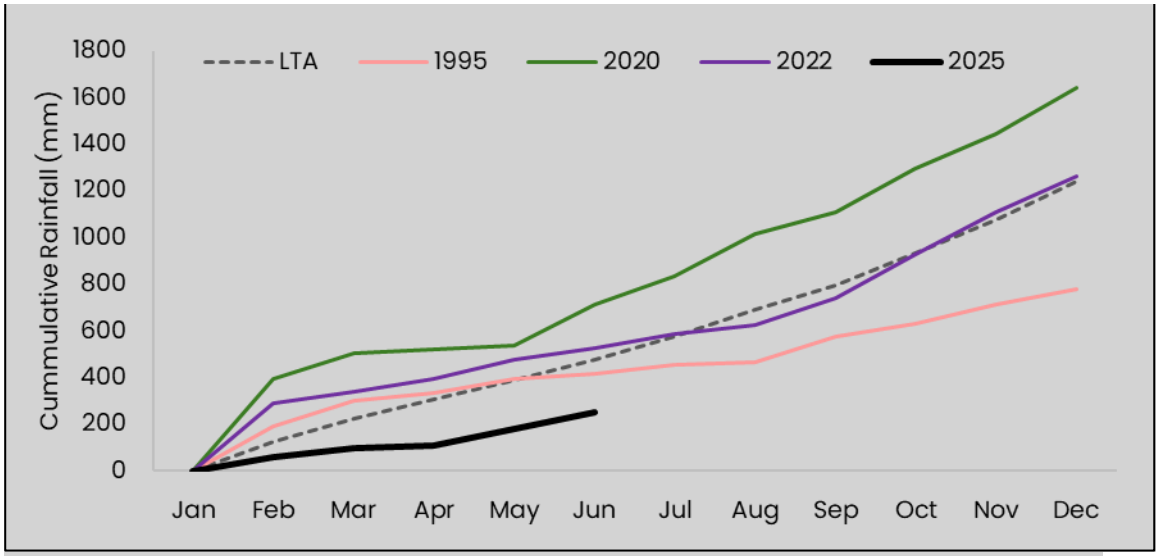


Figure 8 Cumulative rainfall plotted against previous droughts and long-term average

Standardised Precipitation Index (SPI)

The Standardised Precipitation Index (SPI) values can be interpreted as the number of standard deviations by which the observed anomaly deviates from the long-term mean. The SPI can be calculated for differing periods using monthly input data. We have calculated the SPI for all the monthly rainfall data listed in Figure 6 for a 1-month, 3-month and 5-month duration (i.e., 1-, 3-, and 5-months window respectively leading to the month shown in the first column). The 5-months from February to June are severely dry, while the 3- and 5-months preceding May are extremely dry according to the index categorisation. The lowest index is associated with a three-month period preceding April 2025.

SPI of 2025 rainfall for the North West

2025	SPI - 1month	SPI - 3month	SPI - 5month
February	-0.602	-0.183	-0.695
March	-1.529	-1.507	-1.012
April	-2.515	-2.637	-1.248
May	-0.009	-2.247	-2.142
June	0.134	-1.194	-1.954

SPI Category:

Extremely Wet (≥ 2.0)	Severely Wet (1.5 → 2.0)	Moderately Wet (1.0 → 1.5)	Near Normal (1.0 → -1.0)	Moderately Dry (-1.0 → -1.5)	Severely Dry (-1.5 → -2.0)	Extremely Dry (≤ -2.0)

Figure 9 SPI values across the period of analysis

Rainfall Ranking

The ranking of the rainfall periods compared to the historic dataset is shown in Figure 10. Different periods preceding the period of analysis are presented up to twelve-month durations. For example, the accumulated rainfall for the 11 months leading up to February 2025 was the 79th driest on record. The Cunnane probability ranking has been calculated for each duration and the rankings are shaded accordingly. The 5-month period preceding June 2025 is the 5th driest on record and classified as exceptionally low rainfall according to the Cunnane probability ranking. The 3- to 5-month periods preceding May 2025 are all in the top three driest periods on record.

Rank of 2025 rainfall in period since 1871

North West 2025		Duration (months) 1	2	3	4	5	6	7	8	9	10	11	12
End Month	Feb	40	38	64	49	34	61	45	40	37	59	79	96
	Mar	11	10	7	39	26	21	44	29	23	21	45	61
	April	2	1	2	2	17	9	12	26	15	14	12	25
	May	80	10	1	2	2	18	10	11	30	18	15	12
	June	83	73	21	6	5	5	19	11	13	30	19	17

KEY: Cunnane Probability Ranking:

Exceptionally high (>0.95)	Notably high (0.87→0.95)	Above normal (0.721→0.869)	Normal (0.28→0.72)	Below normal (0.131→0.279)	Notably low (0.05→0.13)	Exceptionally low (<0.05)

Figure 10 Ranking of the rainfall against historic records

Supporting Information

The following section summarises non-rainfall analysis as supporting evidence.

Soil Moisture Deficit (MORECS)

We have used the Met Office Rainfall and Evaporation Calculation System (MORECS) to estimate Soil Moisture Deficit (SMD). Data from the MORECS database is much less granular than rainfall data being aggregated to 40 x 40km grids. This limits our ability to present data specifically for the geographic extent of the NW region. As advised by the Environment Agency Hydrology Yorkshire team, we present data for grid square 92 which covers the largest extent of the NW region. Figure 11 highlights the current trend in 2025 versus historical years dating back to 1993 as well as key droughts in this time. The SMD is currently above the 90th percentile and significantly greater than the 2022 and 1995 drought years.

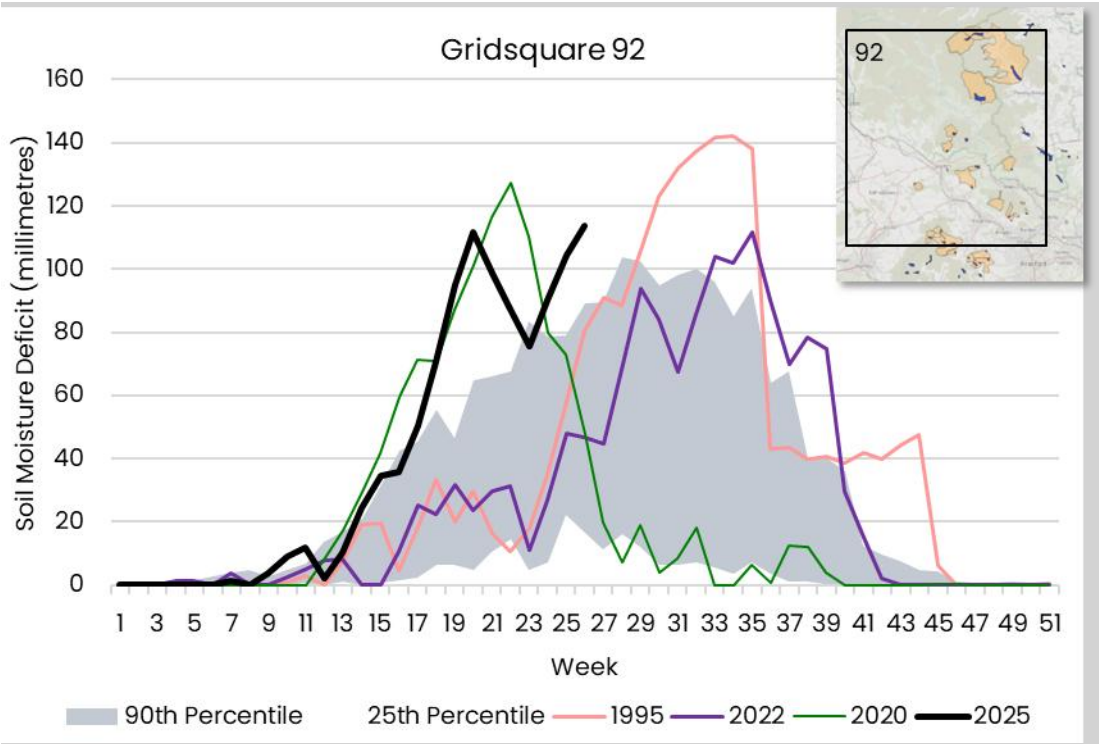


Figure 11 Grid square 92 soil moisture deficit compared to historic droughts and long-term average

River Flows

River flows are another symptom of low rainfall. The NW region has the greatest interconnectivity with the River Wharfe; part of the area lies within the river's catchment and releases from an upstream reservoir are determined by the river's level. Figure 12 shows the river flow rate at the gauge against the lowest years since 1989, including the key historical drought years of 1995 and 2022. The most remarkable feature of this plot is that the flow was consistently low between the start of March 2025 and the end of May. Flows in the Wharfe are highly sensitive to rainfall events, typically rising and falling rapidly. Due to the prolonged exceptional shortage of rain, the river flows in early 2025 were below the lowest flow band of 252 Ml/d between 3rd April and 26th May 2025. The flows rose above the aforementioned flow band briefly following rainfall in late May and late June but not for a sustained period of time.

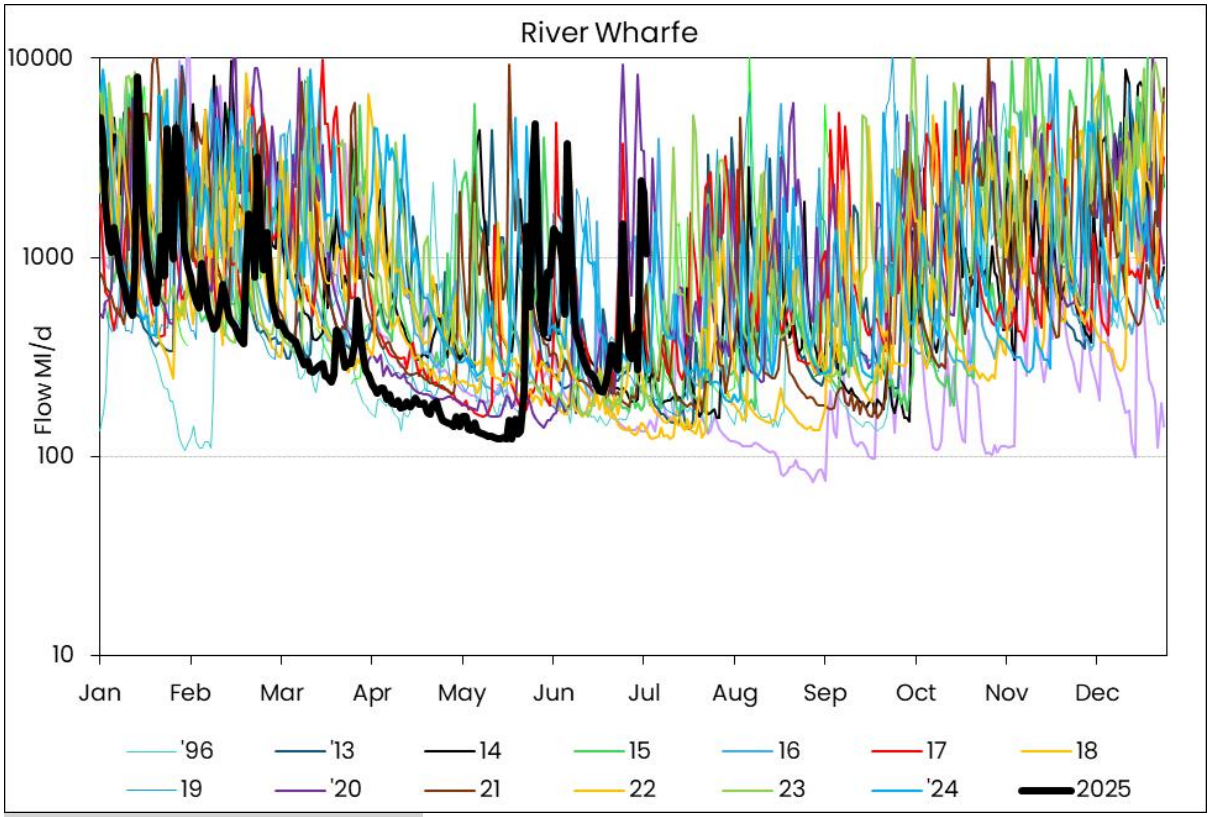


Figure 12 Flow in the River Wharfe

Reservoir Levels

Figure 13 shows the reservoir levels in our NW group; the levels are lower than any other year at this point in the year. Reservoir levels were above 90% at the start of the year following a relatively wet autumn and winter of 2024. However, between February and May, the stocks declined steeply at a consistent rate of approximately 3% each week. The reservoir levels have recovered in May/June following some rainfall and efforts to balance stocks across the Yorkshire Water region. The reservoir levels show that the dry weather has impacted on the water stocks in the NW region and it will require significant rainfall to increase supplies.

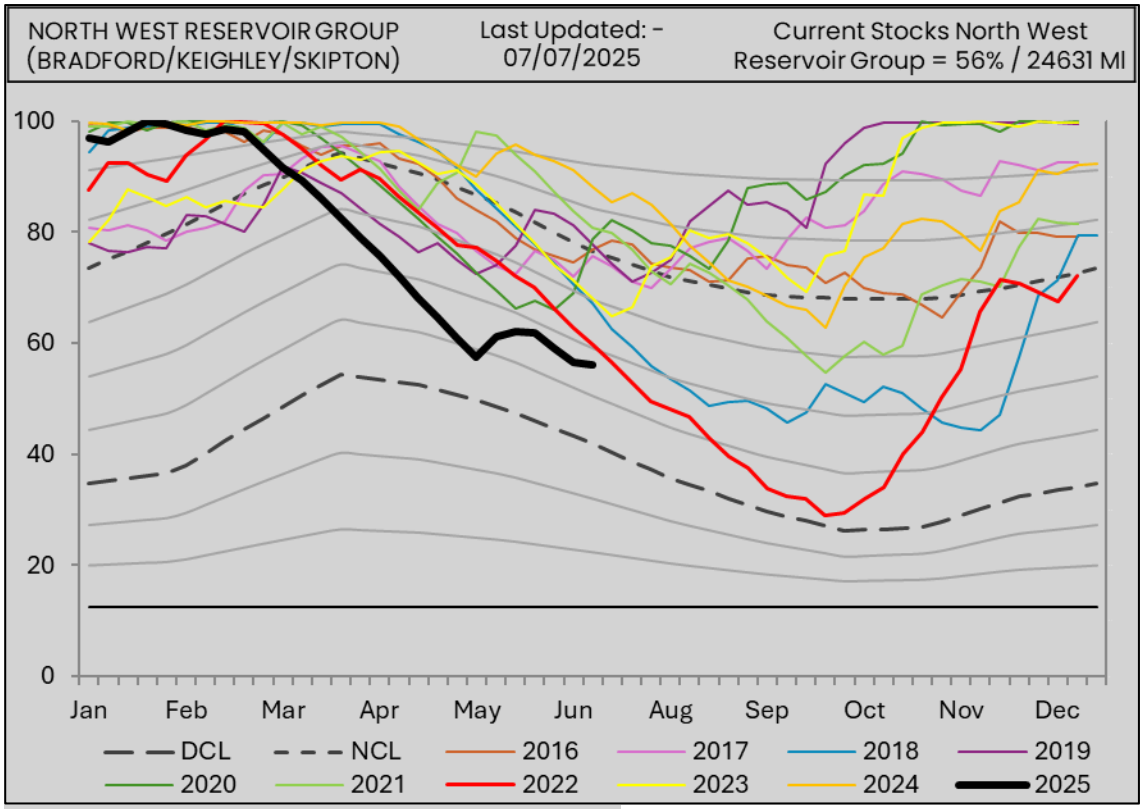


Figure 13 Reservoir levels of the north west group

Summary and Conclusions

The spring of 2025 has been exceptionally dry. Across our NW region, the 5-month period to June was the 5th driest since records began in 1871, and the three-month period up to May was the driest. The SPI and ranking analyses indicate conditions were extremely or exceptionally dry across several durations within the analysis period.

The low rainfall so far in 2025 has been accompanied by periods of hot weather, and this combination of hot dry weather has resulted in high SMD values throughout the region. As a result, when there has been intermittent rainfall, it has not resulted in significant runoff to rivers. The River Wharfe has had very low flow, and this has resulted in record low reservoir levels for this time of year.

The dry weather means we must be ready to take action to avoid water shortages later in the year. If the exceptionally low rainfall continues (or even if there is below LTA rainfall during the summer), our forecasting models predict extremely low reservoir levels and the need for further drought measures according to our drought plan.

Appendix 5: Supply-side drought management actions

Supply-side drought options require an assessment to demonstrate an understanding of the impact on the environment of implementing the action. The overall approach taken in completing the assessment is illustrated in Figure 15.

Determining the zone of influence and timing of the drought option

The first stage of the environmental assessment for each supply-side option is to determine the zone of influence, defined through hydrological effects, and the timings of the drought option and the likely changes to the hydrology due to a proposed action.

Physical environment: characterisation at a reach scale

The physical environment characterisation and the assessment of likely changes from the drought option are then set out for each reach within the zone of influence. The physical environment is described in terms of the reach setting, and for those aspects which may change as consequence of the drought action, the reference conditions without the drought option and the likely changes from the drought option.

The physical environment characterisation includes four key aspects:

1. Reach setting
2. River flow regime (reference conditions and sensitivity)
3. River habitats (reference conditions and likely sensitivity)
4. River water quality, including water quality pressure (reference conditions and sensitivity).

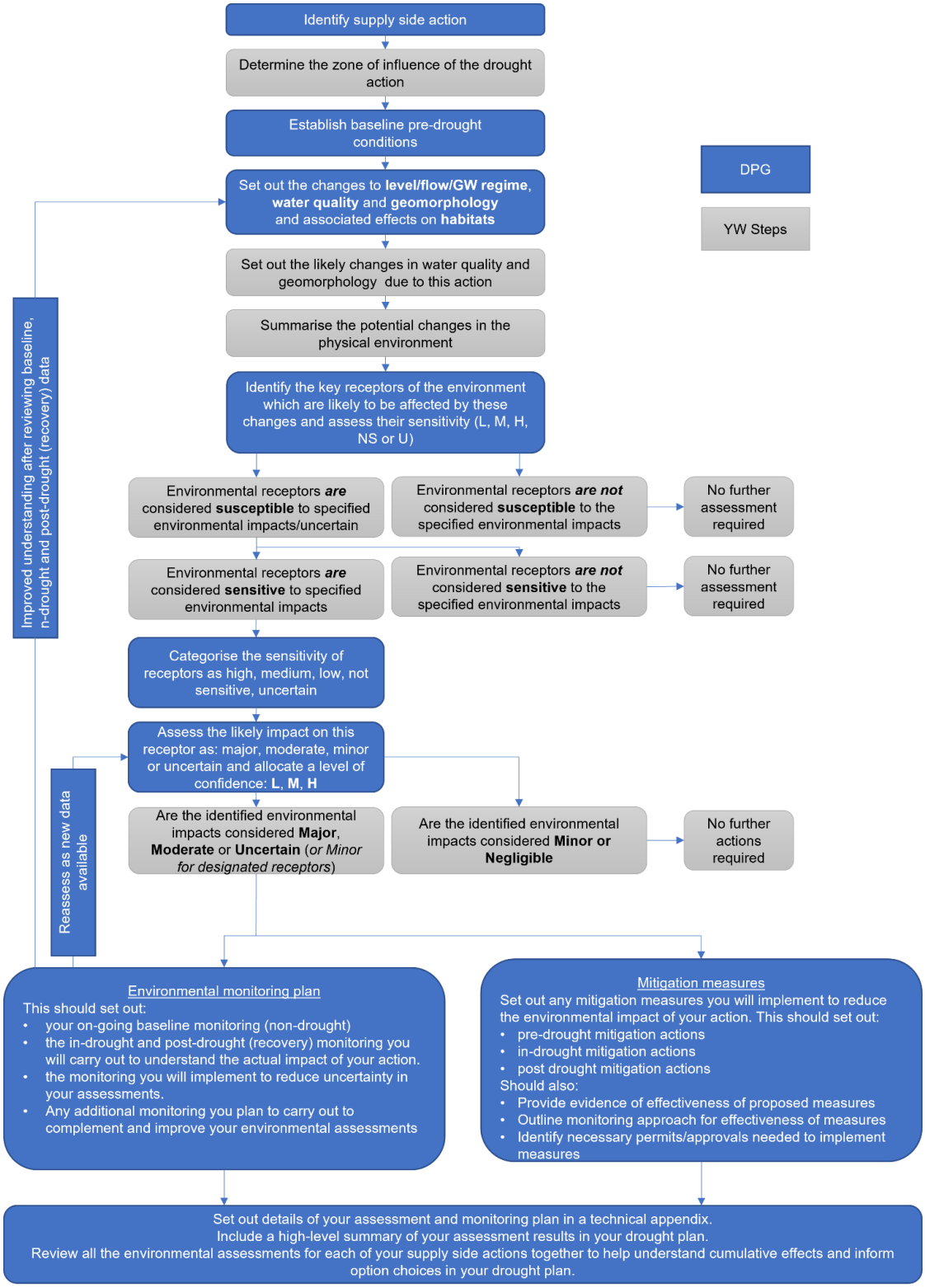


Figure 14 Approach to undertaking environmental assessments as identified in the DPG2025. Steps in blue are DPG2025 tasks. Tasks indicated in grey are Yorkshire Water Tasks

Identifying key receptors of the environment which are likely to be affected and assessing sensitivity

With the zone of influence and considering the level of impact on the physical environment identified, potentially sensitive receptors (sites / features) are identified. This sensitivity assessment is used as a screening exercise to identify features that should be considered for detailed assessment. The key features considered include:

- designated biodiversity sites (Special Area of Conservation (SAC), Special Protected Area (SPA), Ramsar, Sites of Special Scientific Interest, landscapes including World Heritage sites, Scheduled Monuments, European Landscape Convention, Marine Conservation Zones, national parks, Areas of Outstanding Natural Beauty, National Nature Reserve and Local Nature Reserve and Natural Environment Research Council (NERC) species which are located on or within 500m of the impacted reaches;
- local wildlife sites and NERC priority habitats which are located on or within 100m of the impacted reaches;
- ecological communities and, where identified, WFD status of designated waterbodies which contain the impacted reaches;
- sensitive ecological features as advised by the EA and Natural England;
- invasive non-native species;
- the historic environment, to include the conservation and enhancement of the historic environment, historic landscape character and historic structures associated with the water environment, or the historical context of their setting and
- wider features which should be taken into account in determining the potential impacts of drought action implementation – specifically other abstractors, landscape, navigation, recreation and heritage.

Where features are considered to have a medium or high sensitivity to drought options, these are considered for detailed assessment. The exception are sites and features that are considered to be of national or international importance. In

such cases, these features will also be considered for detailed assessment where a low sensitivity has been identified

Assessing impacts

Where screening of the drought options has identified that a sensitive ecological feature is present within the zone of influence of the drought option and screening has indicated that it is sensitive to the impacts of the drought management action, the potential impact is investigated. The investigation considers the impacts of the changes in flows, water quality and geomorphology as a result of the drought management action, and the consequent impacts on the habitats and species.

We allocate a level of confidence to our assessment and set out the actions we will take to reduce uncertainty. We also set out mitigation actions that we can take against the potential impacts.

Cumulative assessment

In accordance with the DPG2025, the assessments also consider how our proposed drought actions may affect the environment in combination with the effects of existing licences, consents and plans. For example:

1. Existing abstraction licences that operate within the hydrological zone of influence of the drought options, as well as other abstraction and discharge consents;

2. Assessment of the most likely cumulative impacts of the drought permit with other supply-side and drought permit / order options within the hydrological zone of influence (including both intra- and inter- zone options);

3. Potential cumulative impacts with other third parties' drought schemes.

Appendices 5.1 to 5.7

For details on each potential supply-side drought action including a summary of the environmental impacts please see the following in the separate Appendix 5 spreadsheet:

Appendix 5.1: North Area options

Appendix 5.2: South Area options

Appendix 5.3: South West Area options

Appendix 5.4: North West Area options

Appendix 5.5: River options

Appendix 5.6: Extreme drought options

Appendix 5.7: EA Drought Orders

Appendix 6: Our extreme drought options

Extreme actions are drought actions that would be implemented after level 3a actions were in place and if we enter drought level 3b. They include actions to further reduce demand, and additional actions to increase supply such as new supplies and connecting infrastructure. We summarise our approach to extreme drought options in Section 4 of our main Drought Plan. This appendix provides additional information on these options.

We have 23 extreme drought options we would consider if there was a risk of entering level 3b and list these Appendix 5.6. A number of these options would require a drought order or permit although some are within existing licence permissions. Additional permissions may be required from the Drinking Water Inspectorate (DWI), planning authorities, Natural England and the EA (for example, discharge consents).

Links to WRMP

A number of our extreme options are feasible options within our WRMP and require new assets and / or infrastructure to be installed. They remain as extreme drought options for the life of this Drought Plan but if any of our extreme options were implemented as a solution in our WRMP or regional plan, they will no longer be included as drought options.

We consider WRMP actions in an extreme drought as they have potential to provide larger benefits than other extreme drought actions. They may also be less environmentally impacting than temporary supply-side actions which allow abstraction at low flows or reduce compensation flows. However, the infrastructure requirements may need to be considered differently to permanent WRMP options, and it is possible overland pipes will be implemented or temporary assets that would not be utilised under normal circumstances. We will ensure our Drought Plan annual reviews and the next iteration of our Drought Plan reflect the status of extreme drought options if they are progressed as part of another plan.

New supply options

We have extreme options that involve introducing new supplies to our network, reinstating a previously discontinued resource or increasing our use of existing licenced resources. As with all our options, the water would not be put into supply without investigating the environmental, safety or drinking water quality implications. The assets will be assessed prior to implementation to determine

the impact to water quality and the environment. If any risks are found that cannot be mitigated the source will not be used. We will consult the EA, Natural England and DWI during the assessment process.

Specifically, when considering introducing any new sources to be used ultimately for drinking water, we would engage with the DWI in order to meet all requirements for the delivery of potential new sources under Regulation 15 in the Water Supply (Water Quality) Regulations 2016. This would include following our Drinking Water Safety Planning risk assessment methodology and submission of Regulation 28 documentation as necessary. By this stage we would already be meeting regularly with the EA.

We would start discussions on the instigation of environmental monitoring requirements associated with the relevant extreme options. If actions require permission to abstract from water sources we do not currently use, or to increase existing abstraction volumes, we will need a drought permit or ordinary drought order and would begin the pre-application process.

As these options require additional assets and infrastructure additional permission would be sought. We have identified appropriate planning requirements and planning authorities who would give the required permits and approval for the extreme drought options. At the point of understanding which options were needed, we would contact the relevant planners to arrange a meeting to discuss our proposals and the required permits and approvals, including pre-application requirements, in advance of submitting any formal applications.

Option selection and prioritisation

When selecting which options to implement at level 3b, we would consider water availability and where in our supply system the additional water was required. Depending on which areas are most affected by a drought, the water for some options may not be available and we would have to discount these. Our grid system allows us to transfer water around the region, but in a drought situation we would still need to consider where additional resource was most needed and select the most appropriate option for that area.

In section 6 of the main draft plan and in the separate HRA and SEA reports we have included the potential risks associated with implementing individual options and the risks to the environment that we would need to consider in a drought when determining the feasibility of each option. The timescales for

implementing each extreme drought option will also determine the feasibility of the scheme. At level 3b we will be in a severe drought and will prioritise options that have a benefit in the short term (up to 12 months). We will also consider options that will take longer to implement but would make us more resilient if we were in a long-term drought lasting two or more years, which is unprecedented in our region.

For demand reduction options and non-location specific supply-side actions the benefits are largely unknown and could vary significantly depending on the drought conditions. A preliminary prioritisation, and assessment, has been included in Appendix 5.6. The preferred order of implementation would be for demand reduction actions to be implemented first. In an extreme drought situation, it is most likely we would assess the feasibility and benefits under the exact circumstances and implement several actions simultaneously. Recognising this, we have grouped actions into a prioritisation scale of 1 to 3.

Appendix 5.6 gives estimated timescales for each of the options, allowing for planning and environmental assessment as well as construction. In a scenario where level 3b options are triggered some of these options would not be completed in time to be available in a second or third year of drought. However, we may consider implementing these schemes if we are in an unprecedented drought situation and there is a risk the drought could last longer than three years.

Internal transfers

We include new internal transfers in our extreme options list. However, we may consider transfers earlier in the drought process but only after level 1 and 2 actions had been implemented and when level 3a options are triggered or implemented already. This will be largely dependent on the magnitude of the supply deficit to be addressed and the areal extent of a drought to determine whether any transfers would have an impact where required.

The permissions and mitigation measures for transfers would be site specific and dependent on existing connectivity (for example, EA guidelines permit releases down cascade reservoirs) therefore the exact process can only be determined case by case. Should a drought develop which presents a transfer opportunity we have prepared a procedure document to follow taking into account the

various steps we would consider. This overarching procedure is shown in Figure 16.

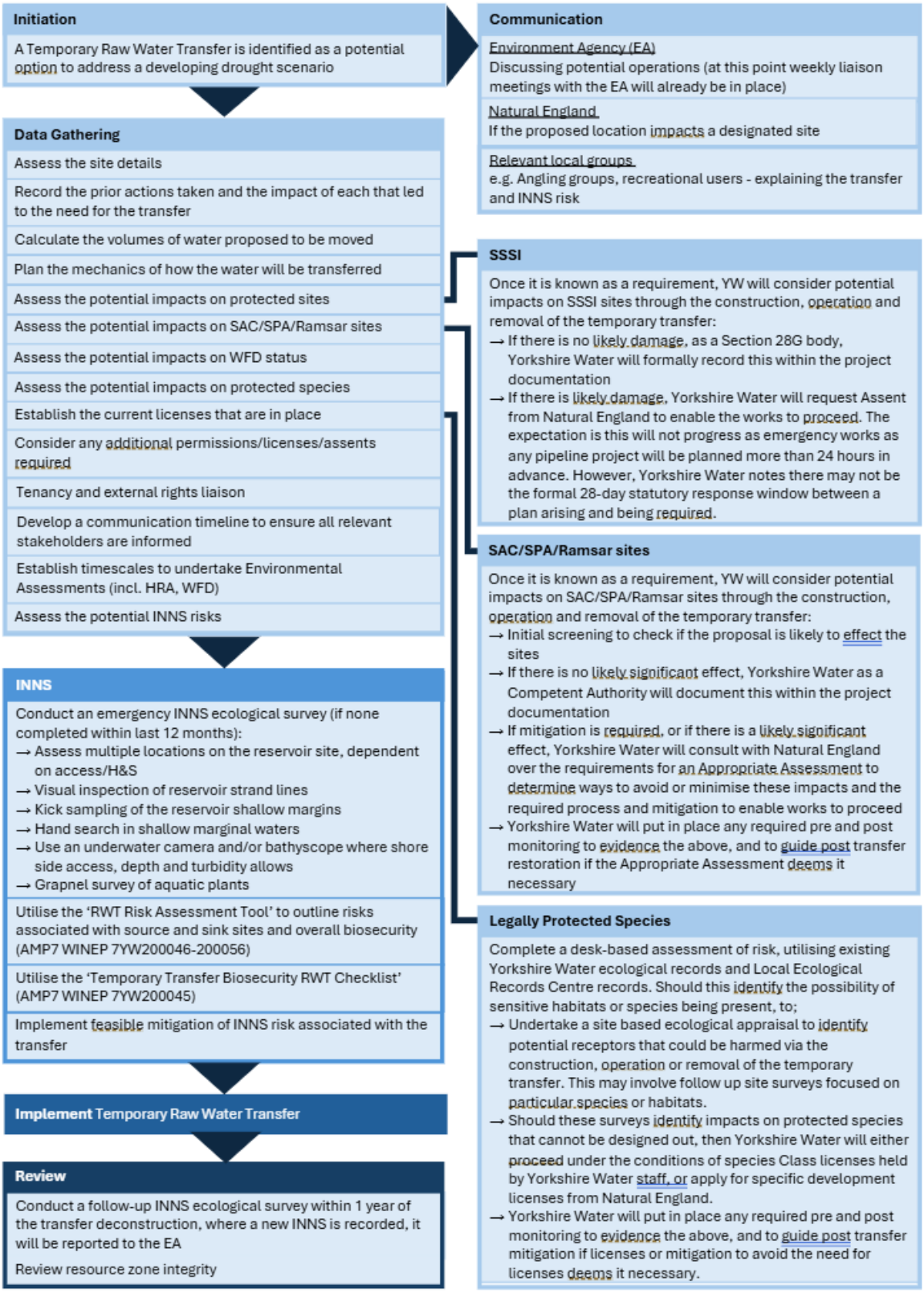


Figure 15 Procedure for determining the process for transfers if required

Drought level 4

Drought level 4 is the most extreme level of drought, and it is extremely unlikely that we would enter level 4. However, we have an emergency drought plan which sets out how we would operate in this scenario. Our emergency drought plan is not publicly available for reasons of national security but, in the event of a severe drought, we would ensure all customers:

- Are fully informed of the situation and how they are impacted which will include restrictions on use more extreme than temporary use bans or non-essential use bans, i.e., pressure reductions.
- Have access to enough water to meet their needs e.g. standpipe locations, water tanks or bottled water stations.

Emergency drought orders

At level 4 an emergency drought order would be sought to implement extreme actions. We summarise the actions and implementation requirements in Table 19.

Option Name	Emergency drought order
Action description	Prohibit / limit the use of water for any purposes considered appropriate including pressure management control to a level below service standards.
Trigger(s) or preceding actions	Regional reservoir stocks and/ or one or more area reservoir stocks cross 15% storage level.
Demand saving	Entirely dependent upon extent if drought, demand at time of implementing and practical implementation. If the piped supply of water fails, we are legally obliged to provide to affected consumers, within the first 24 hours, at least 10 litres of water per person per day, then double this to 20 litres of water per person per day[6], and maintain until the piped supply is restored. Water companies can do this by providing bottled water or through bowsers or standpipes. On average our customers use 125 litres each per day so a reduction to 10 litres is a reduction of more than 90%. However, we would do everything we can to ensure that emergency drought orders are not required.
Location / area affected	Will be applied to affected areas taking into account localities of priority customers such as hospitals. This will limit the use of restrictions.
Implementation timetable	Implemented when reservoir stocks for corresponding resource group enter emergency storage. The time to implement this measure will depend on the extent and success of other drought orders / permits and emergency drought orders. The preparation time will be approximately 4-6 weeks. Implementation time will be approximately 2-4 weeks
Permissions required and constraints	Permission by DEFRA via an emergency drought order following successful application by the company (and public inquiry if necessary)
Risks associated with option	An emergency drought order permits the use of rota cuts, severe pressure management, water tanks and standpipes. All of which are a risk to public health, society and the economy and we would select the least damaging options, which are most likely to be rota cuts and / or pressure management. Severe pressure reduction would maintain our minimum standards of 3mh in the water main. The impact on service to customers of all options would be below guaranteed standards.

[6] *Supply interruptions - Ofwat*

Option Name	Emergency drought order
	Reversing the actions once supplies recovered could take several months and could be damaging to the network which would create an additional risk to security of supply. We provide more details on emergency drought orders in our emergency plan.

Table 19 Emergency drought order implementation summary

Appendix 7: Communications plan – additional information

This appendix provides additional information on our drought communications plan described in Section 5 of our main Drought Plan. The aim of our communications is to inform customers, stakeholders and colleagues of the dry weather situation, the actions we are taking and how they are affected, whilst promoting the importance of making increased effort to save water in the event of a drought. As a drought develops, we monitor and review the effectiveness of our drought communication activities and ensure we are promoting the right messages, at the right time via the right channels.

Communications at different drought levels

Our communications during a drought will aim to reduce demand for water and keep customers and stakeholders informed of the developing situation. We have an 'always on' approach to our water saving campaign as we know having consistent messaging all year round is an important part of how we can change customer behaviour. We enhance this activity to align with the drought levels defined by the EA.

Table 20 illustrates the types of messages we would promote to our customers, stakeholders and colleagues at different points within a developing drought situation (up to drought level 3b).

The objectives of our communication plan are to:

- Reduce domestic water use by promoting water saving messages and offering free retrofit devices.
- In consultation with retailers, provide services to commercial users in the Yorkshire region and promote the need for water saving to non-household water users.
- Work with the EA and other regulators to pro-actively manage communications / messages about why a drought has occurred.
- Deliver clear and consistent communications in conjunction with other water companies and NAVs within our supply area affected by a drought.
- Work with local stakeholders and third parties to promote drought communications in local communities.
- Communicate the activities we're undertaking to minimise the impact of the drought on customers and the environment.

- Engage with customers to build their trust to show how we're managing the impact of drought on water supplies.
- Raise awareness of water use restrictions, in addition to the formal notices we will publish.

Drought stage	Key message / action promoted
Normal (green status)	• Even in times of plentiful supply customers should use water wisely • We can all play our part in conserving water for the future • Efficient use of water helps retain more water in the environment, reduces the need for investment in new supplies and can reduce water (metered customers only) and energy bills • We're playing our part by investing in reducing leakage on our network, new water supplies and building more resilience in our network • Promote our ongoing water efficiency initiatives • Provide details of any non-household incentive schemes if applicable.
Prolonged dry weather (level 1 yellow)	• We have experienced lower than average rainfall and although we are not in a drought there is a risk of a drought developing if the dry period continues • Customers have a part to play in using water wisely and should take additional action to conserve water where possible • If customers spot leaks, they should report them to Yorkshire Water as soon as possible • Yorkshire Water is operating to secure enough water for domestic and commercial use and the environment during dry weather • Non-household customers utilising a lot of water should consider ways to reduce water use now and consider resilience options if the drought continues • Yorkshire Water is increasing leakage reduction activity, balancing water stocks and moving water around the region to manage the impact of prolonged dry weather. • Include signpost to EA and MOSL's drought status information.
Drought (level 2 and 3a amber)	• Everyone must take action to help conserve water • If applicable customers should follow restrictions that are put in place i.e. temporary use bans

Drought stage	Key message / action promoted
	• There is a realistic prospect that your water supply may be rationed if the situation worsens • Current information on the drought and any restrictions in place can be found through the Yorkshire Water website, social media and other media communications • We have plans in place should we enter a severe or prolonged drought situation and we will keep customers informed of the situation • Statistics on how far below average the rainfall for the proceeding 3 / 6 / 9 / 12 months • Information on how far below average for the time of year reservoir storage is currently • Data on how far below average for the time of year groundwater levels are currently and how above average demand currently is. • We are continuing to invest in reducing leakage, managing supplies and find innovating ways to improve resilience. • If the drought situation worsens, we may have to implement an Ordinary Drought Order via a Non-Essential Use Ban which applies further restrictions to customers. • This is not a decision we have taken lightly, and we thank customers who have already been doing their bit to save water to help us preserve supplies.
Severe drought (level 3b and 4 red)	• We make customers aware that we are in a severe drought and that it is a serious situation Statistics on how far below average the rainfall for the proceeding 3 / 6 / 9 / 12 months has been. • Information on how far below average for the time of year reservoir storage is currently. • Data on how far below average for the time of year groundwater levels and how far above average demand currently are currently. • Customers need to ensure they understand what restrictions are in place and adhere to the restrictions, including when TUB and NEUB non-statutory exceptions are removed. • Everyone must play their part in helping to conserve water and only use what water they need • Customers can receive regular updates and water saving advice on the situation through a vast range of media channels • We are doing all we can to minimise the impacts and protect public health

Drought stage	Key message / action promoted
	• Please use water for essential use only. There is a realistic prospect that your water supply may be rationed • Should the drought deepen, we will be implementing Emergency Drought Order across our supply area from a specified date. • The TUB and NEUB also remain in place and those who do not adhere can be subject to a fine. • We will lift the Emergency Drought Order, TUB and NEUB once rainfall, reservoir storage and groundwater levels return to more normal levels for the time of year. • Include signpost to EA's drought status.
Recovering drought (amber to green status)	• It's still important to be careful about the amount of water we use in our homes and businesses • Thanks to the excellent response from our customers to our appeals to use water wisely, and increased rainfall in our region, we will be lifting the TUB/NEUB/Emergency Drought Order restrictions on a specified date. • It could take "xxx" amount of time and "xxx" rainfall to get back to normal. Some restrictions may remain in place until then • We ask our customers to continue conserving water as it will take some time for our reservoir and groundwater levels to return to normal levels. This will help us avoid the prospect of further restrictions. • Droughts can continue to affect your water supply during recovery.

Table 20 Drought communication during different drought conditions

Non-household and retailer communications

Table 21 outlines our approach to non-household communications at each drought stage. Appeals for water conservation to non-households will be part of our wider customer communications. In additional to this we will be communicating with retailers and in more extreme droughts we may engage with non-household sectors or large water users. Our approach has been developed to align with the Retail Wholesale Group Good Practice Guide.

Drought stage	Communication Objective	Communication
Normal	• Build awareness of water efficiency benefits. • Deliver AMP8 non-household (NHH) demand reduction programme	• Regular retailer communications as part of BAU • The Watsit report will be signposted to retailers

Drought stage	Communication Objective	Communication
		• NHH promotions will be general requests with some direct contact to NHHs offering initiatives such as water audits / leak detection.
Level 1	• Encourage voluntary savings • Explain developing drought risk	• Retailer drought communications at least once a month • Review potential for joint communications with retailers • Non-household messaging will be strengthened and initiatives targeted at high demand areas
Level 2	• Raise awareness of compliance with TUBs where relevant and need for increased voluntary reductions	• Retailers will be notified in advance of TUBs (RWG Good Practice Guide requires water companies to provide retailers with a list of SPIDs affected by any drought restrictions and provide as much notice as possible and a minimum of 1 business day.) • General communications will include reference to the relevance of the restrictions to businesses users
Level 3a	• Intensify demand reduction messaging • Promote the need for voluntary actions aligned with the NEUB restrictions in advance of imposing • Provide clear messaging before, during and after a NEUB • Initiate direct communications	• Retailers will be notified in advance of NEUBs (RWG Good Practice Guide requires water companies to provide retailers with a list of SPIDs affected by any drought restrictions and provide as much notice as possible and a minimum of 1 business day.) • Direct appeals could be made to high-use sectors, local authorities, industry groups
Level 3b	• Encourage significant reductions in demand through targeted engagement and direct customer communications • Communicate TUB and NEUB non-statutory exceptions are removed.	• Individual businesses will be contacted directly to discuss water saving potential

Table 21 Non-household communications by drought stage

Agile communications

Our drought communications campaign takes an agile approach to ensure we can adapt swiftly to changing circumstances. Our drought messages will escalate as triggers are crossed to move towards a more urgent tone and

images that convey the need for action. We do not rely on a single trigger for changing the status as our experience in recent years has shown that we need to consider multiple factors relating to demand, rainfall and reservoir levels that represent the current situation. Alongside these we consider both weather and water resource scenario modelling and forecasts of weather conditions that provide evidence on the potential short to medium-term future risks.

Based on this information, we may escalate or de-escalate the messaging in reaction to the changing situation. We use pro-active press releases to generate media coverage as an early response to dry weather, whereby the communications are appropriate for the developing situation, and can be scaled up or down as needed.

The critical factor is the weather, particularly rainfall and high temperatures. When demand increases in dry weather, we react to the conditions but must be flexible to changing weather patterns as a hot, dry summer can quickly change to heavy rainfall and risk of flooding. We promote water saving to conserve supplies, but we must also balance this with changing weather conditions that may make certain messages inappropriate. For example, we would not want to advise customers to reduce garden watering if a risk of flooding became apparent, but we would continue with some level of messaging.

Tailored messaging

Our campaign uses an intelligent data initiative that looks to tailor and target messages to audiences based on key water use influencing factors. We work with our appointed external media agency to utilise customer demographics and insights to understand how our messages need to differ in relation to the audience types.

Customers are not all motivated by the same types of messages and it is important that we reflect this with messages that are relevant to different customer groups. For example, some customers need to know why they should save water - what is the reason behind it and then they need to be given choices as to how they can take action in a way that suits their lifestyle.

Stakeholder engagement

Section 5 of our main plan describes stakeholder communications during a drought. We will work in collaboration with regulators, WaterUK and the National Drought Group (NDG) to co-ordinate drought messaging. This will include other water companies and water using sectors such as National Farming Union, the

Agriculture and Horticulture Development Board (AHDB), the Canal and Rivers Trust and the rivers trusts.

We will maintain effective communications with non-household customers and trade bodies in conjunction with retailers by providing:

- Resource updates
- Water quality changes that can occur if a supply is switched to another source as part of re-zoning supplies
- Ensuring the agricultural sector is aware of the situations and actions we are taking and is provided with timely notifications and relevant advice (e.g. https://ahdb.org.uk/water-supply-problems-a-guide-for-livestock-farms)
- Initialise contingency plans for efficient water use e.g. use of on-site storage
- Support customers with good practice guidance

Communication activities and adapting messaging

Key messages

Our drought communication will aim to provide advice on how to reduce consumption and to explain what we're doing to reduce the impacts on our customers and the environment. The key messages will be based around the following:

- We're working hard to minimise the impact of the drought on our customers and the environment by managing and monitoring our water stocks carefully.
- Everyone can make a difference and there are practical steps that can be taken to reduce water usage.
- We'll increase leakage reduction activity on our pipes and our customers' pipes.
- We have a flexible unique grid system so that water can be moved around the region to where it's needed most.

Creative marketing material

We provide some illustrative examples of the types of marketing material we use during a drought situation. Figure 16 and Figure 17 demonstrate two levels of household creative material and Figure 19 and Figure 19 are examples of non-household materials. In the early stages of a drought situation (prolonged dry weather to drought) we will use a less severe message which will be replaced with more urgent creative material if the situation worsens (drought to severe drought).



Summer creative 2025



Winter messaging 2024-2025

Creative 2024-2025

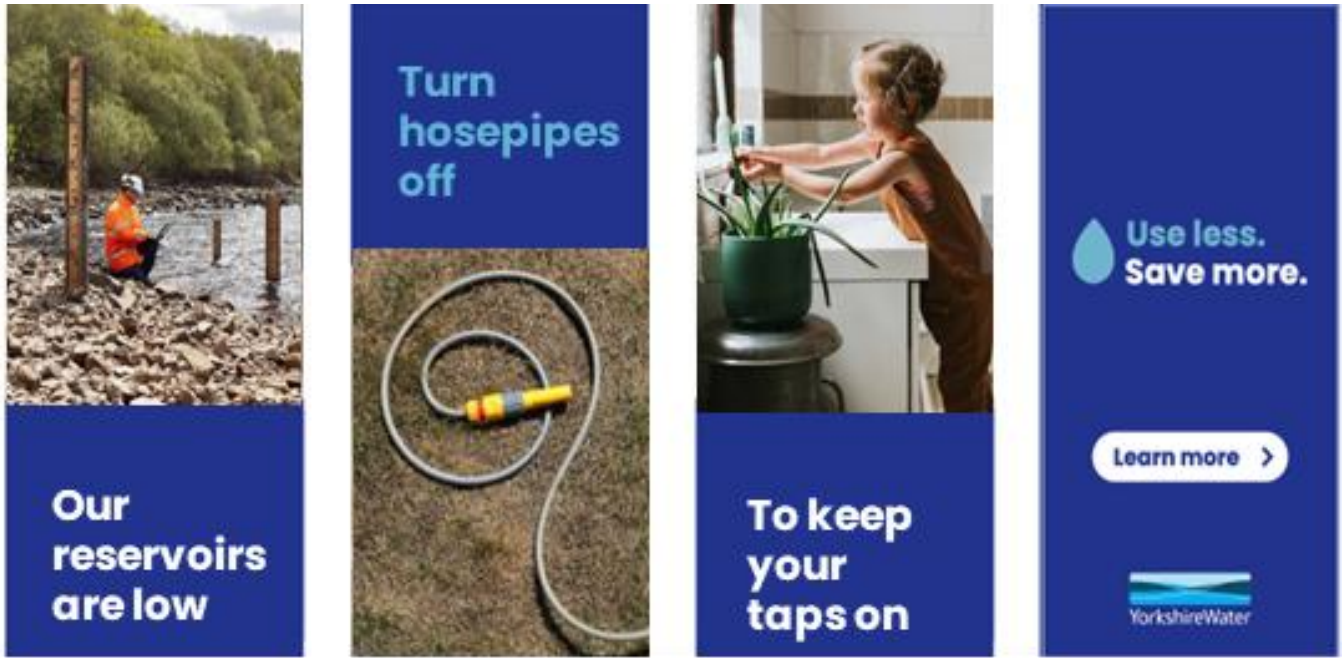


Figure 16 Examples of Creative Materials used to promote water efficiency

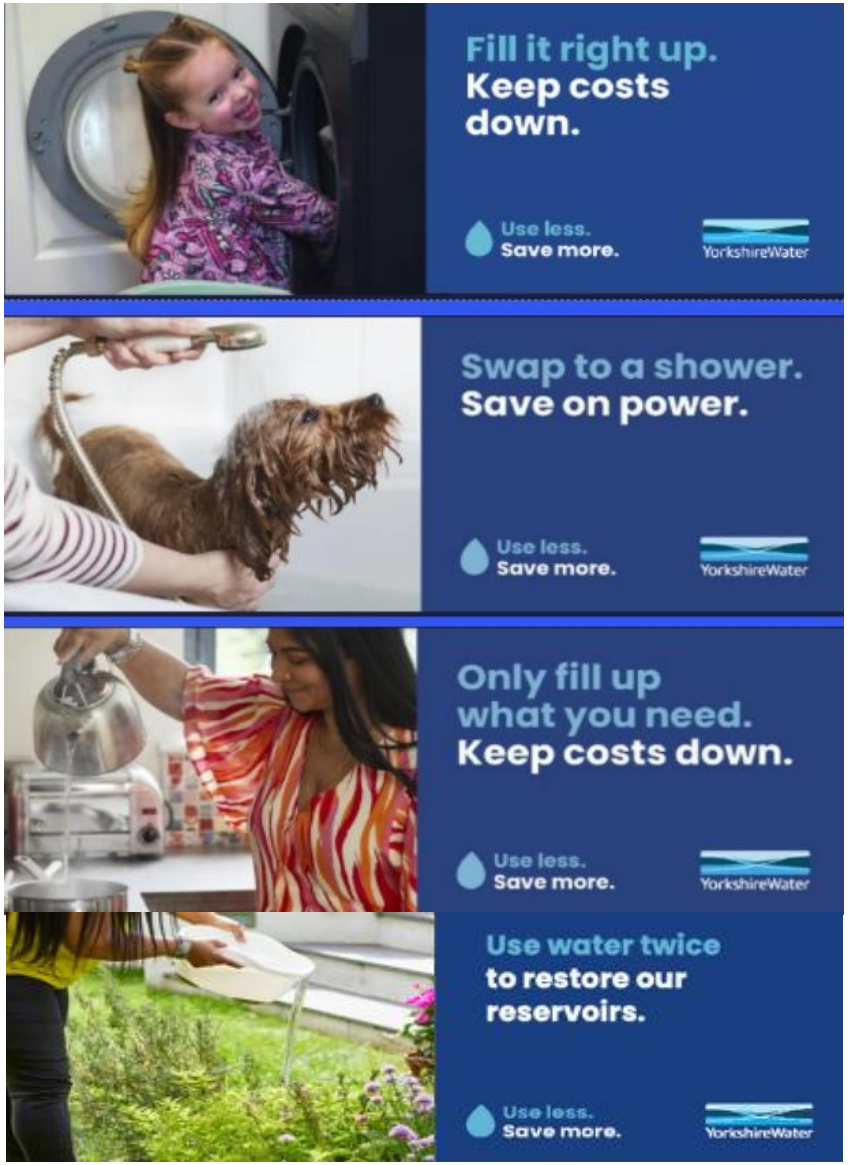








Figure 17 Drought communications example visual

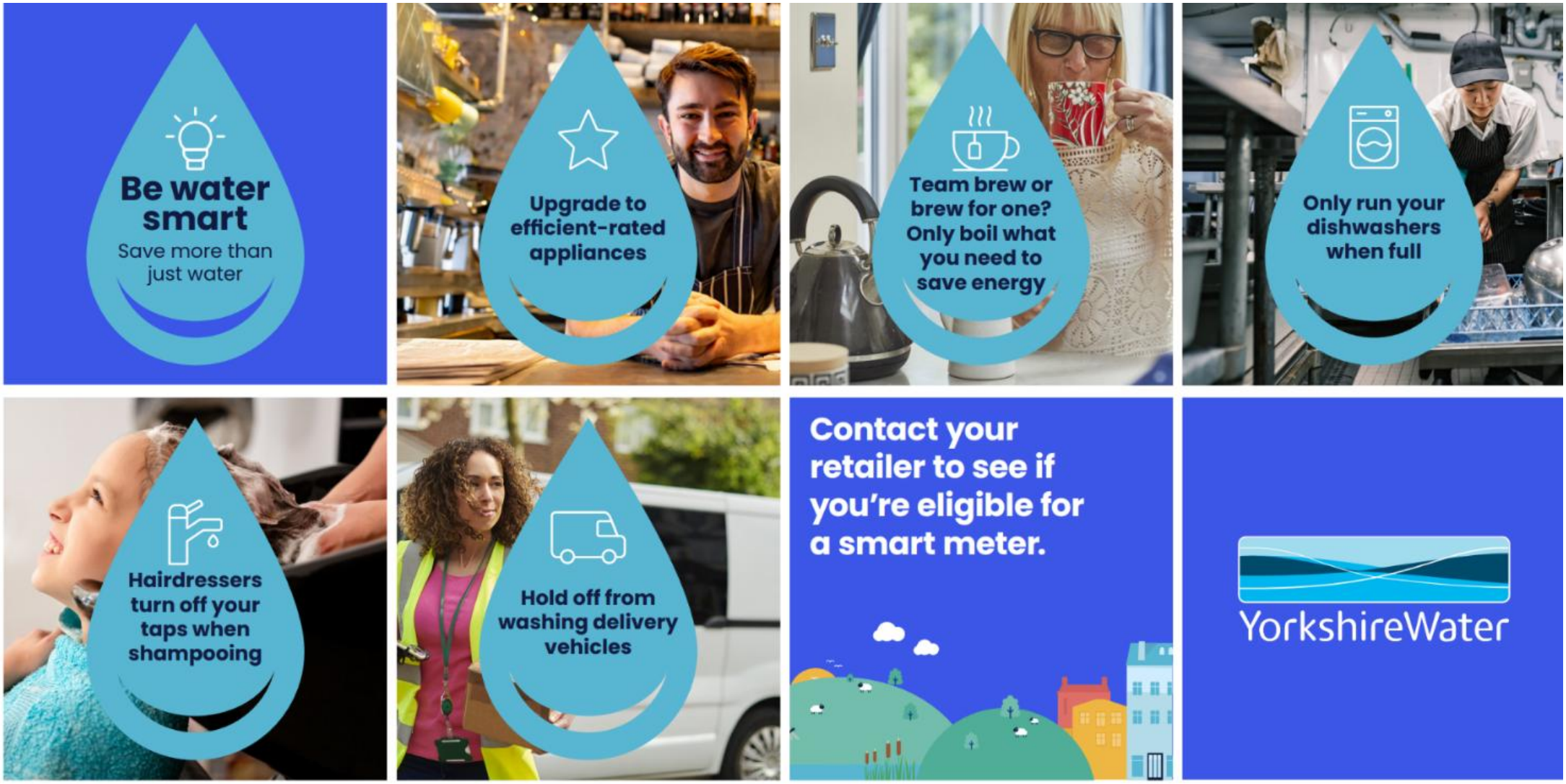
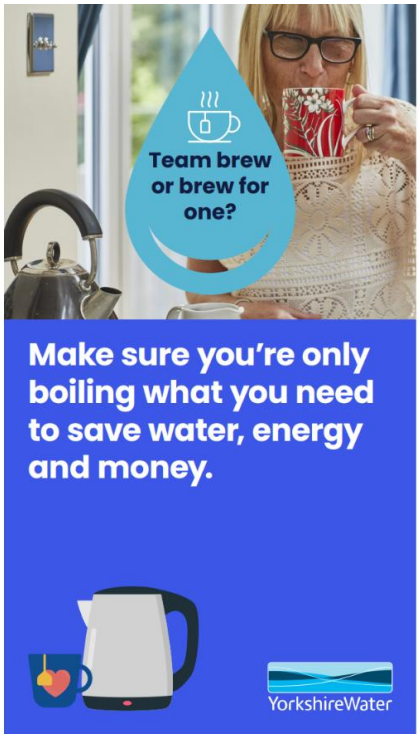


Figure 18 Digital advert examples for Non-Households









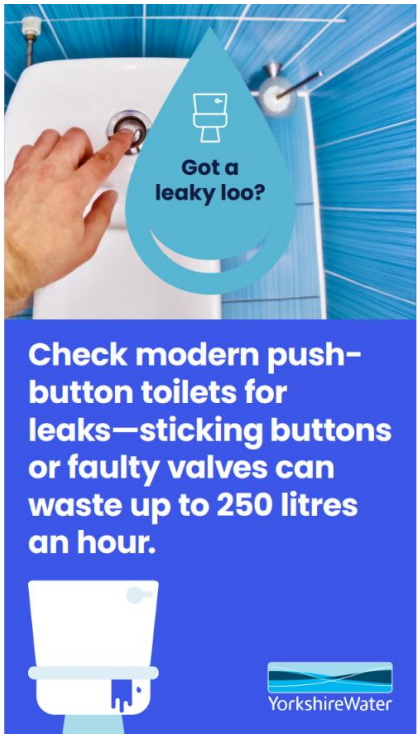


Figure 19 Digital out of home examples

Target audience

Our target audiences include all our customers and third parties in contact with our customers; they are grouped as:

- Over five million domestic households
- Vulnerable domestic customers, for example, elderly, disabled or those with a serious medical condition. We account for the Ofwat 'Service for all' guidance when communicating with these customers
- Retailers and over 140,000 non-household customers
- Sensitive non-household customers, for example, hospitals and care homes
- NAVs operating in our supply area
- Media (national and regional)
- Stakeholders, for example, members of parliament, local authorities, EA, Ofwat, CCWater, Defra & Non-Government Organisations (NGOs)
- Colleagues and service partners, for example, HomeServe, R&M delivery partners and capital partners
- Emergency services.

To make our customer communications more effective we would work with our appointed external media agencies to utilise customer demographics and insights to understand how our messages need to differ in relation to the audience types. This would allow us to tailor our messages to have the best impact and enable us to target customers with appropriate messages. For example, promote garden related water efficiency in areas with gardens and not in those areas where properties predominately do not have no gardens.

We would also use customer segmentation data to identify target audiences based on geographical location, allowing us to make the message more relevant to the developing situation in that specific area, as well as identifying the most appropriate and effective communications channel to use.

Any messages we provide will be adapted for customers in vulnerable circumstances. Through our Vulnerability Strategy and Priority Services Register (PSR), customers can register support needs through a range of channels,

enabling us to provide tailored support and communications during drought events.

Additional support includes accessible communications (such as translation services and alternative formats) and dedicated customer contact channels prioritised communications for customers requiring additional assistance. Customers registered on the PSR are exempt from Temporary Use Bans (hosepipe restrictions) and actions restricting use of a hosepipe under a NEUB.

In a Level 4 drought there is a risk of supply restrictions although this is unprecedented. In these circumstances we would provide alternative water provision for all customers and tailored support to those with medical dependencies or accessibility needs.

Responsibility for supporting customers sits across our customer, operations and communications teams, with escalation through established drought governance processes. If we were to enter Level 4 drought we would be following our Emergency Drought Plan.

Non-digital customer communications channels

Written customer communications

Bills posted during a drought will carry a water saving message with additional water saving information.

In the event of water restrictions, priority services customers in affected areas would be sent direct customer communications to explain their exemption.

Face to face customer contact

Customer drop-ins, events or roadshows will be organised in local communities in key areas that are particularly affected by the drought or have high demand.

Colleagues would be on-site to answer customer queries and provide advice. Local customers would be invited to these events through media and social media promotions.

Any customer drop-ins or face to face meetings scheduled in other parts of the business will promote water saving messages and offer water saving devices. For example, we regularly communicate with customers on capital schemes and would include key messages on water saving.

Customer-facing field-based colleagues will be briefed with key messages and given customer literature and water saving devices to distribute to customers at properties where they have an appointment.

Yorkshire Water Assets

Additional signs would be produced and displayed at reservoirs, particularly those affected by the drought. Signage would also be displayed to warn visitors to our reservoirs about increased safety risks caused by low reservoir levels.

Digital Channels

Website

Water saving advice would be heavily promoted to customers visiting our website via the homepage. We have a dedicated drought information / advice page on the website which would provide the latest information on the situation (updated accordingly), including where relevant updates to go if water restrictions are put in place, latest information on water stocks, as well as the areas impacted by drought conditions. There would also be an advice hub for both domestic and non-household customers for ways in which they can save water. Any social media or media activity should be linked back to this page.

Social Media

Our social media channels would promote key water saving advice, devices and any other useful videos or messages. We would start a regular cadence of situation updates either by video or infographic to keep customers informed of the developing situation. To create engagement opportunities, if the time was appropriate, we could run polls to prompt customers to think about water saving.

Videos featuring water saving advice will be promoted via our social channels and sent to other relevant online platforms / websites.

We would use Hootsuite, a social media monitoring tool, to monitor conversations across social media and use this platform to respond to customer enquiries. Yorkshire Water's communications team and our customer contact centre would be provided with relevant and up to date FAQs and messages to help them respond to customer enquiries.

SMS blasting

Text messages could be sent via our blaster service to customers promoting water saving advice or restrictions, but this decision would be made in the context of other communications activity.

Advertising

Paid for advertising

The current situation and water saving advice would be publicised through digital advertising and on social media channels and key third-party websites. Online and social media adverts could be geographically targeted to customers in Yorkshire, and we could change the message very quickly should the situation worsen.

We would also consider radio, newspaper and billboard advertising, particularly if water use restrictions were in place. In extreme cases of drought, television advertising would be used to communicate a conservation message to as wide an audience as possible.

We would also explore what additional channels are available to book at the time to ensure the message is getting to a wide audience and reaching as many people as possible. This could be online channels, like Spotify and programmatic display or offline channels, such as, out of home adverts and buses, for example.

Customer contact centre

Colleagues in our customer contact centres (LOOP) and colleagues in our Customer Management Centre (CMC) will be briefed on how to talk to customers getting in touch about water conservation and will be provided with an extensive FAQ / Q&A document to respond to customer queries. Customer service advisors will also offer free water saving packs to customers.

Key conservation messages will be recorded to play to customers when on 'hold'.

In severe drought, we would work with the contact centre to determine whether proactive calls to customers were appropriate.

Media activity

Pro-active media activity

Media will be sent weekly updates on the current water supply situation. Interviews will be set up with environment / consumer correspondents across regional media channels to explain how we are managing water supplies and how customers can save water.

Media features would be developed to look at educating customers about how water is captured, the different sources of supply we use, how we work hard to get it to customers' homes from our treatment works and how they can play their part in conserving it.

Features will also be developed to show customers what we are doing to conserve water for example; they could spend a day with a leakage technician.

Localised stories will be prepared and targeted at the relevant media, focusing on local water supplies. Case studies will be developed of people who have changed their water saving habits and as a result are now using less water – these will be used to generate advice pieces in local media.

Reactive media activity

The Yorkshire Water media team will be available 24 hours a day, seven days a week to respond to media enquiries. Relevant spokespeople will be identified and trained from across the business to take part in TV or radio interviews. Comments within social media arenas like Facebook, Twitter, forums, blogs and websites will be responded to where it is felt to be appropriate.

Key stakeholders

We will keep all key local, regional and national stakeholders updated on the latest situation with tailored communications to ensure they have the information most relevant to them. For example, we work with stakeholders such as rivers trusts and our regulators on the Water Resources in the North (WreN) regional group. As well as feeding information to stakeholders, we will ensure our communications promote two-way dialogue and stakeholders have the opportunity to ask questions and feed their comments into our plans for dealing with drought. As we progress along the drought plan, and the tone of messaging develops, we will engage more regularly with key stakeholders.

WReN Statement of Intent

WReN has developed a multi-sector Drought Group to improve regional drought preparedness and facilitate coordinated action across sectors. Table 22 summarises the actions identified within the Statement of Intent[7] and comments on how we align with the actions.

It is important to note that the role of WReN does not include the development of a regional Drought Plan, nor does it aim to override an organisation's own Drought Plan. It seeks to support in the facilitation of collaborative discussion within and between sectors where this helps the overall outcomes of managing drought response for society and the environment.

WReN Statement of Intent Actions	Alignment with the drought plan
The purpose of the WReN multi-sector Drought Group is to facilitate collaboration between sector groups, regulators and wider stakeholders to enhance regional preparedness for periods of prolonged dry weather and drought events.	We describe our company level engagement with other sectors in Section 5 of our main Drought Plan document and the WReN Drought Group and its membership is described in Section 5.5.1.
Before, during and after a drought:	
Monitor and share sector information on the current and forecast water situation.	Our company level monitoring is described in Section 1.5.2 of the main drought plan with further information in Appendix 4. During droughts we will attend the WReN Drought Group monthly meetings and provide updates on our water situation.

[7] waterresourcesnorth.org/globalassets/water-resources-north/wren-drought-group-statement-of-intent---v2-final.pdf

WReN Statement of Intent Actions	Alignment with the drought plan
Where beneficial to do so, align communications and messaging between sector groups, stakeholders and the public during drought	Section 5 of the main Drought Plan describes our drought communication plan and Section 5. 2 specifically covers regional co-ordination and aligning communications where appropriate. Variations will occur as it is unlikely the whole WReN region will be at the same stage of drought simultaneously.
In the development of water management plans, actively seek drought management options that provide wider benefits including resilience to both floods and droughts, improvements to water quality; and enhanced resilience of drainage and wastewater systems.	We will review feasible options as part of our Water Resources Management Plan 2029 development in parallel to developing the second WReN Regional Plan. This will include consideration of wider option benefits beyond water resource and drought resilience.
Before drought	
Promote the development of sector drought plans with monitoring plans and early warning indicators.	Continue to monitor resource position, regular liaison with NDG (annual drought health check, cross sector at main NDG group) and always on water saving messaging for customers.
During Drought (response phase)	
Identify areas of water availability and stress across the region during drought	Our drought planning activities and those of other WReN water companies will provide information on areas of water supply stress in our region. We will share this with other sectors and regulators who will provide information on environmental, agriculture and other industry drought risks.
Facilitate discussion to identify opportunities for water rights trading and sharing between abstractors to manage drought response	the WReN Drought Group will provide a forum for water rights trading opportunities to be discussed between sectors and regulators when in drought.

WReN Statement of Intent Actions	Alignment with the drought plan
After drought	
• Incorporate drought learning into medium and long-term water resource planning • Evaluating the effectiveness of drought response measures	After each drought event we will review lessons identified and how our Drought Planning can be improved. The hydrological and demand data from the event will be used in our WRMP and support long-term planning. We will also contribute to the WReN Regional Plan development and drought learning. We describe drought learning from 2025 in Appendix 9
Ongoing actions	
WReN will work with other regional groups to share best practice and lessons learnt recognising that other regions may be in drought while WReN is not and vice versa.	Representatives of WReN will attend National Drought Group meetings to share learning and best practice when in drought. See Section 5.5.2 of our main Drought Plan document for further information. We are also an active member of the Regional Plan Co-ordination group that meets regularly during the development of regional plans.
Environmental and social commitment	
In all drought management activities, the needs of the environment, including water dependent habitats and other sensitive environmental sites, will be a key consideration. Working with the Environment Agency and Natural England representatives (whose principal role is to protect and improve the environment), the group commits to pursuing drought management solutions that protect and enhance the natural environment. Social needs will also be a key consideration in all drought management activities. Working with CCW and the water-dependent sectors alongside	Our drought actions align with the sequencing proposed in the EA's Drought Planning Guidelines which aims to minimise environmental and social impacts through initially operating within the confines of our abstraction permissions whilst requesting voluntary reduction in use. Options that impact on the environment or customers will only be used if there is a risk of a severe drought developing, and to conserve supplies for both customers and the environment until the situation recovers.

WReN Statement of Intent Actions	Alignment with the drought plan
the water companies (who bring knowledge of their customers e.g. through significant customer research), the group commits to pursuing drought management solutions that protect social needs.	

Table 22 Alignment of drought plan and WReN Statement of Intent

Stakeholder communications

We will write to stakeholders (including politicians, regulators, National Farming Union, Canal and Rivers trust and environmental non-governmental organisations such as the river trusts) to provide updates on the latest situation and the action we are taking. The content of which will be adapted to ensure it is relevant to the audience, for example by providing local advice and information to MPs and councillors and a more regional position to key national stakeholders.

Where appropriate we will include links to more information on the website as well as contact details for the Yorkshire Water public affairs team should anyone have any questions or wish to discuss the issues further.

One to one communication

We will increase the frequency of communications and schedule meetings as appropriate for stakeholders with a particular area of focus or concern to ensure key stakeholders have the opportunity to discuss the situation with senior Yorkshire Water colleagues.

The corporate affairs team will also offer stakeholders visits to our control centre, reservoirs or key water treatment works for stakeholders to understand how we manage water resources. This will provide an opportunity to give them more detail on the situation and will also act as a media hook for getting across key messages to customers.

Water saving resources

MPs and local councillors will be provided with water saving information to share on their digital platforms and at surgeries. Similarly, key NGOs will also be encouraged to share water saving messages with their members through their websites, newsletters and social media channels.

Working with other water companies

We will work with neighbouring water companies to develop joint communications for customers and media as appropriate. This will ensure clear and consistent messaging to maximise understanding of the water resources situation and the actions that our customers can take to make a difference. As described in section 5 of the main drought plan this work occurs via the Water Resources North (WReN) regional group, the National Drought Group (NDG) and through bilateral meetings.

Colleagues

Making our colleagues aware and keeping them up-to-date with the developing situation will be key throughout any dry weather or drought situations. A number of different channels will be used to do this:

Intranet

The Yorkshire Water intranet will be one of the main places where colleagues can find the latest information on the water resources situation. We would post articles, updates, Q&As and videos to update colleagues on the key messages and inform colleagues about what we're doing to manage supplies, what current stock levels are and what key messages they should be giving to customers, friends and family.

Other channels

Emails could be sent to all colleagues containing essential information on the situation.

A weekly briefing could be emailed highlighting the latest need to know information

- Key senior managers and directors could increase the number of regular briefings for cascade by people leaders
- Colleagues who deal directly with customers, particularly face to face, will be briefed and sent specific regular updates so they can answer customer queries. This could be done via email, their local team meetings, and/or newsletters.

Water supplies to enable firefighting

Yorkshire Water has a Request for Assistance (RFA) process which enables the four Fire & Rescue Brigades in Yorkshire to contact the Yorkshire Water Control Room 247 where they have a fire incident which has escalated to more than five fire appliances, a high-volume pump is attending a fire incident or there are poor supplies at an ongoing fire incident. This RFA Process was developed by Yorkshire Water & West Yorkshire Fire & Rescue Service in 2018 and has been rolled out to all the Fires Services in Yorkshire in 2020. The process provides a live reactive consultation between fire crews on site and the Yorkshire Water Control Room to highlight the availability of network assets suitable for the purpose of firefighting which the fire service would not otherwise be aware of.

During hot dry weather the risk of fires increases, particularly in rural areas where wildfires can spread quickly. Our operational teams support fire crews with their incident response via the RFA process and we are working with the fire brigades to expand out to cover, where operationally feasible, remote non-networked areas of Yorkshire that are typically more susceptible to wildfires. We also support with locating and access to open water sources, not just our own reservoirs but non-YW reservoirs, ponds and rivers, for example.

Where Yorkshire Water has entered into drought escalation and has implemented drought measures, a full consultation with partners at Local Resilience Forum level via the Tactical Coordinating Group (TCG) and through National Incident Management (NIM) meetings needs to take place to understand risks and contingencies. For the purposes of firefighting the existing request for assistance process will provide Fire & Rescue Brigades in Yorkshire a channel into the Yorkshire Water Control Room for consultations to ensure sufficient supplies are made available in the event of an incident.

Customer views

We regularly review communications and seek customer views, including those related to drought actions. Below we summarise customer feedback and research findings regarding water-saving creative materials and TUBs.

Feedback on creative materials

Feedback on creative materials used in 2022 highlighted the effectiveness of visuals that depicted the impact of drought on reservoirs. Creatives showing

reservoirs at low levels proved effective in encouraging behavioural change. Customers found the "shock" factor of reservoir imagery to be particularly impactful. Since the 2025 drought we have carried out further creative testing development which reinforces the effect of showing the impact of drought on our reservoirs.

Temporary use bans

We have carried out customer surveys in 2013, 2018 and 2022 to assess attitudes to water use restrictions in our region.

During preparation of our 2013 Drought Plan we consulted with customers and key interest groups on the concept of temporary use bans shortly after they were introduced by the Flood and Water Management Act (FWMA) 2010. We commissioned research to investigate customer awareness and understanding of the new powers and to seek views on the prioritisation and potential concessions for restrictions.

The results supported a non-phased approach to implementation of temporary bans on water use. Most of our customers felt that the maximum water saving would be made from temporarily banning the washing of cars and watering of gardens with a hosepipe during droughts. Temporarily banning other activities listed under the FWMA 2010 was perceived to be of little benefit to conserving water under drought conditions.

In 2018, we commissioned London Economics to carry out research into temporary use bans (‘*Future options for managing customer demand for water*’). This paper concluded domestic consumers were confused by what a temporary use ban entailed and that non-domestic consumers perceived themselves to be greatly affected by a temporary use ban. There was also evidence to suggest consumers would rather accept water restrictions over an increase to their billing costs.

In 2018 we held “qualitative workshops” and conducted in-depth interviews with customers to gain an insight to consumer reactions to temporary use bans. This demonstrated that if the water company is perceived as having acted responsibly, and the reason for implementing a ban is a result of a serious shortage of water, then customers are more likely to accept and comply with a ban.

Further research, aimed at gathering consumer reaction and attitudes towards hosepipe bans, found that homeowners are worried that their garden, cars and social relationships will be damaged or diminished by a ban.

Following the 2022 drought we carried out an online survey which provided insights into customer attitudes during an actual ban. The key findings were:

- Almost all customers were aware of the TUB and the majority accepted it as a necessary preventative measure.
- Communications from Yorkshire Water were clear and appreciated.
- Most customers believed TUBs were a result of climate change and were willing to re-evaluate their usage. However, there was a feeling that Yorkshire Water could do more to manage resources, such as reducing leaks.
- Nearly half of customers understood the TUB as necessary, were not surprised by its implementation, and were happy with the action taken. One in three had a neutral response. Many saw it as a sensible precaution and were not inconvenienced.
- Customers expect Yorkshire Water to adapt to and mitigate the risks of climate change, which they view as inevitable.

Appendix 8: Drought management escalation procedure

Our drought management escalation triggers, team responsibilities and membership are set out in Table 23. This table shows how the changing drought levels move from business as usual (BAU) through to Bronze, Silver then Gold risk management teams as the drought severity increases. These categories align with company incident management plan.

The Raw Water Management team are convened ahead of any indication of drought and will review operational activities in preparation for dry weather in any year. The incident management teams convene when we experience prolonged dry weather and the level increases as the situation escalates.

The exact membership is dependent on the specific drought requirements. The decision to form each team would be made no later than the triggers stated in Table 23.

Team	Raw Water Tactical Group	Bronze	Silver	Gold
Trigger	Regional reservoir stocks reach the NCL	Regional reservoir stocks reach level 1	Regional reservoir stocks are likely to enter level 2	Regional reservoir stocks enter level 2
Chair	Raw water management team	Manager of Water Resources Strategy	Head of Strategic Water Resources and Regional Planning	A member of the Senior Leadership Team (e.g., Chief Executive Officer)
Membership	· Environmental Compliance · Reservoir Safety · Water Production · Water Quality · Supply System Engineers · Water Resources	Incudes the Raw Water Tactical Group and representation from: · Water Resource Planning team · Customer and communications team · Wholesale team	· Raw Water Tactical Group Chair · Bronze Chair · Customer and communications team · Wholesale Service Desk team · Further representation from Water Resources, Asset Planning, Finance, HR, Contract Services, Asset Delivery, Demand Management, Distribution Legal and health and Safety teams as required.	· Includes representatives of the Senior Leadership Team · Representatives from the Silver team · Additional representation such as the Emergency Planning Manager

Team	Raw Water Tactical Group	Bronze	Silver	Gold
Responsibilities	Review operational risks across the asset base and ensure resources are being used in the most effective and efficient way	· Review drought scenario modelling to aid decision making · Ensure business readiness to drought actions as required. · Ensure external communications are aligned with the projected potential risks. · Lead company interface with the Environment Agency, the National Drought Group and external stakeholders · Share updates and ensure alignment on customer, retailer, NAVs, and media communications.	· Liaison with the Yorkshire Water Executive · Represent Yorkshire Water at any national drought meetings ·Managing staff resources · Managing all communication with the Environment Agency, Drinking Water Inspectorate and other stakeholders and regulators.	· Liaison with the regulators and Defra at the senior level · Critical decision making
Frequency of meetings	Meet weekly until stocks recover or escalated to the next level (Bronze)	Meet weekly until stocks recover	Weekly or twice weekly until stocks recover	Weekly or twice weekly until stocks recover

Table 23 Drought Management escalation teams

Appendix 9: Lessons identified 2025

Following droughts or periods of prolonged dry weather we review our drought plan performance and if any changes should be made. Since publishing our Drought Plan 2022 we have experienced droughts in 2022 and 2025. In both years drought actions were triggered, and our Drought Plan provided an effective guide to drought management.

In 2022 a very wet February (with 200% of long term average rainfall) was followed by the (at the time) 4th driest March-August period since 1887, with only the drought years of 1995, 1976 and 1887 having less rainfall in that period.

We describe the lessons from the 2022 drought in Appendix F of WRMP24. No material changes were made to our Drought Plan as a result. In 2022 the dry weather triggered level 1 to 3 drought actions. A TUB was in place from 26 August 2022 until 6 December 2022. Permits were granted to reduce compensation flows for reservoirs in the South and North West areas, and to alter abstraction permissions on the River Wharfe and River Ouse. We implemented three of the reservoir compensation permit activities. The EA applied for two drought orders to reduce compensation flows.

Overview of the 2025 drought

The 2025 drought resulted in an unprecedented early onset of severe drought that continued to the end of the year. In January our regional reservoir stocks reached 95.6% but this was followed by the driest period recorded in Yorkshire from February to August for 137 years. Reservoir stocks crossed the NCL on 25 March, activating the initial pre-drought operational response. The Bronze Risk Team convened on 3 April 2025 in reaction to below average rainfall. Additional activities included leakage control, demand reduction activities, and extensive communications. The incident management risk was escalated to Silver on 22 April on crossing the EA Early Warning Control Line (which is now the start of the level 1 band) and was raised to Gold on 12 May. These actions were taken earlier than previous droughts in response to the exceptionally dry conditions. On 12 June, Yorkshire was the second region (after United Utilities) to enter EA "Drought Status".

We moved to level 2 drought actions on 11 July when a TUB was imposed across our supply area. Supply-side drought permits applications were submitted from 25 July 2025. In total, 44 drought permits and 2 supply-side drought orders (one EA, one YW) were granted across the region. The EA drought order was

implemented on 30th July. From 28th August we implemented 24 drought permits and the YW drought order, along with two reservoir drought options not requiring authorisation, moving us into level 3a.

Rainfall in the autumn of 2025 led to reservoir stocks replenishing to 90% by September. As modelling showed the risk of return to drought was no greater than in a "normal" year all drought permits were revoked by 4 December, and the TUB was lifted on 10 December in alignment with the EA change of the status for Yorkshire from "Drought" into "Recovery". At the time of producing our draft Drought Plan 2027 we are still in the process of assessing the learning from the 2025 drought. We have used a number of routes to identify lessons and to consider performance improvements. This includes internal meetings, workshops with local EA teams, joint regulator / water company workshops and a session run by the National Drought Group (NDG). We also contributed to regional group reviews and a House of Lords inquiry. Review of our Drought Plan performance in 2025 work on reviewing the 2025 drought is ongoing and we provide initial outputs below.

Updating reservoir control lines, models and drought scenarios

Our reservoir control lines and water resource simulation model have been updated to include data for 2025. We have updated our worked examples to include the new control lines and reservoir bands for each drought level.

The updated reservoirs' control lines using the latest 2025 drought information are shown in Figure 21 against the pre-2025 control lines. These updated control lines have been used when determining the trigger bands (see Appendix 9.2).

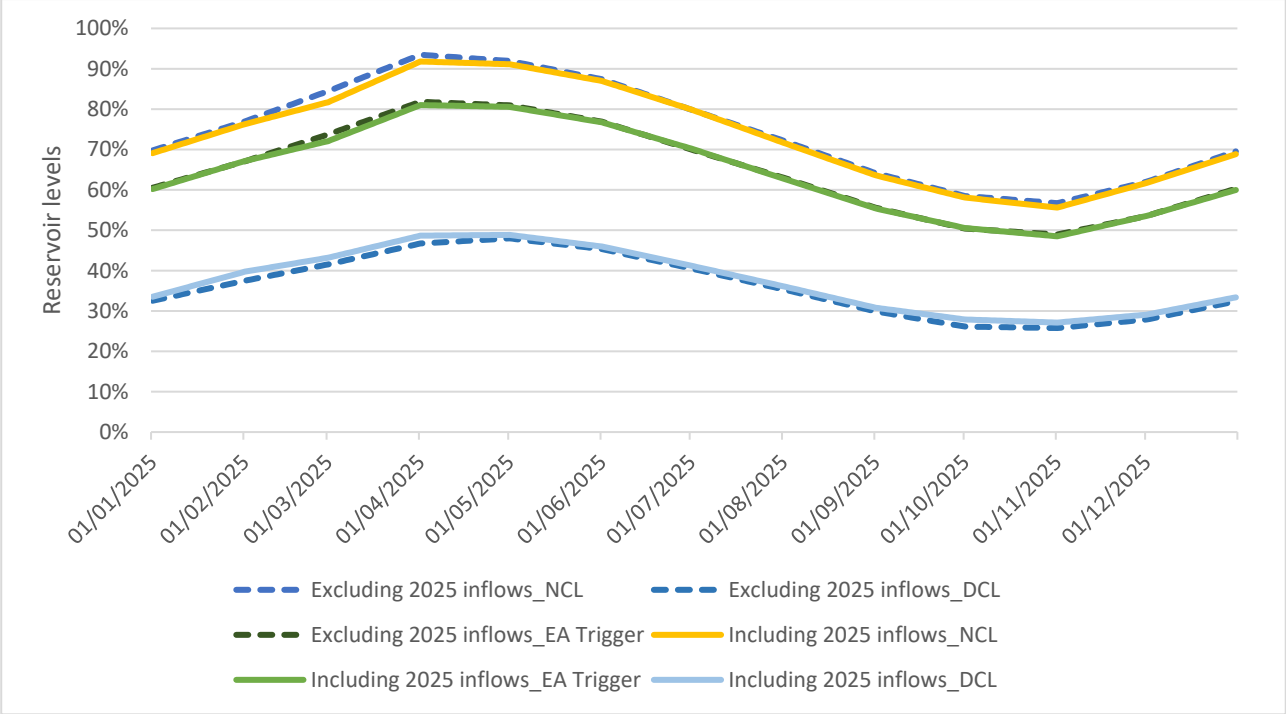


Figure 20 Change in control lines with 2025 data included

Drought triggers

For our Drought Plan 2027 we have reviewed the use of modelled outputs for trigger lines and have altered our approach, which is presented in Section 2.7 of our main Drought Plan document. This change moves away from absolute triggers dictated by control lines and instead uses bands to represent the drought levels as represented in the example included in Appendix B of the EA's Drought Planning Guidelines. See Appendix 9.2 for further information.

This is not a material change to our existing triggers as the bands are closely aligned to the control lines that we used for our drought action triggers in our DP22.

As part of this review, we assessed the transition between level 3b and level 4 and added additional actions to Table 2-2 in our main DP27 document.

We also reviewed the water available on crossing level 4. We collated data on reservoir minimum draw-off levels and updated information on dead-water storage. This resulted in a reduction in the level 4 trigger, from 20% of regional reservoir stocks to 15%.

Temporary use ban trigger and notice period

The 2022 Drought Plan assumed a two-week period between publishing TUB notifications and imposing the ban. In the 2022 drought this was found to be too long creating risk and delaying permit applications. In 2025 we reduced the notice period to 72 hours, and we have incorporated this into our drought worked examples (see section 3.2.5 of our main Drought Plan document).

Drought permit applications

Supply actions (level 3a) to reduce compensation flows or increase abstractions require the EA to authorise a drought permit. The EA guidelines state between April and September a TUB should be in place long enough to have a measurable impact before permit applications are submitted. Our experience from 2025 showed we were able to demonstrate an immediate benefit through the use of smart meter technology. As a result, we have updated our Drought Plan 2027 to state that we will start to submit the drought permit /order applications at least seven days after formally advertising a TUB (between 1st April to 30th September).

There are prescriptive requirements to support permit applications and the EA's guidelines require a two-week pre-application period for each group of permits. This extends the timescale for determination which is four weeks if no objections. The EA process is unable to overlap the handling of permits causing delays which is a major risk to drought management. We have raised this risk in joint lessons identified sessions with both EA Yorkshire and National teams.

We plan to continue to work with the EA on how supply-side actions and the permit application process can be improved for our area which has a significant number of permit related actions due to the high number of reservoirs we operate.

Drought actions

We have reviewed the benefits of actions implemented in 2025 (see Appendix 4.1 for demand-side options and Appendix 5 for supply-side options). To gauge the effectiveness of our response to drought overall we have estimated that options such as reactive operational changes, enhanced leakage activity, proactive communications, reduced customer demand and permits cut stock depletion rate by 13% in 2025. Every drought is different and this rate will be dependent on

numerous variables such as in-year demand, time of year, temperature and intermittent rainfall.

Temporary use ban

We have reviewed the benefits of a TUB and, based on experiences in 2025, estimate that the action can reduce overall Distribution Input by up to 6%. However, this volume does not disaggregate the benefits from those of other demand reduction initiatives. Customers will also be making voluntary reductions as a result of our water saving campaign which will contribute to this saving.

To quantify how effective drought actions such as TUBs are we participated in the UKWIR project WR/02/B/205 *Review the impacts of early implementation of Temporary Use Ban in 2025*.

Non-essential use ban

As we were approaching level 3a drought status in 2025 we reviewed the use of a NEUB and created an application-ready template for a potential NEUB application should it be needed in the future. Analysis in 2025 highlighted the cost-benefit assessment of a NEUB did not justify implementing and an application was not submitted. Many of our non-household customers would already be reducing water use in compliance with the TUB and the benefit of further restrictions did not outweigh the cost to those businesses financially impacted. This highlighted a need to review the potential for other non-household drought options to implement prior to a NEUB. We have added an additional action to bridge the gap between a TUB and a NEUB through appeals to non-households and direct engagement with industry and public sector bodies requesting voluntary reductions in non-essential use (Appendix 4, Table 3). We have also reviewed our non-household communications strategy to build in learning from 2022 and 2025 and to align with the Retail Wholesale Group Good Practice Guide (Appendix 7).

Extreme drought options

Our Drought Plan includes level 3b actions that would only be implemented in an extreme drought to help avoid the risk of level 4 actions. Internal workshops in 2025 were held to review DP22 extreme options, review new DP27 extreme options and identify potential new options. We commissioned a third party to review the

feasibility of the supply-side actions and stress test viability. Demand actions were reviewed internally.

For the draft DP27 we have created a revised list of level 3b actions (see Appendix 5).

Communications

Communication was frequent and centrally managed for customers, colleagues and key stakeholders including retailers and NAVs. High frequency customer communications proved to be beneficial even without specific new messages to share.

During the 2025 drought, all customers had over 184 million opportunities to see or hear our campaign messaging. Expanding media channels increases the effectiveness and 'reach' of customer communications, ensuring that updates were delivered promptly and reliably. There were clear successes from the campaign. For example, 58,000 customers (approx. 1%) have joined our Priority Services Register ('PSR') since the start of the TUB.

Engagement with non-household retailers and NAVs was proactive and two-way including newsletters and webinars. Yorkshire Water co-chaired two national drought forums. All FAQs were updated to reflect UKWIR 2023 Code of Practice with YW leading in this area.

Environmental assessment

Environmental compliance was successfully managed with no failures in the period. Improvements from 2022 include the inclusion of a Bronze incident wastewater tactical group to manage the risk associated with combined sewer overflows and wastewater treatment works discharging into water courses where permits were implemented. The EA carried out thirty-two compliance checks during the process with no fails recorded.

All permits and supporting information were 'shelf ready' with revised environmental assessments. Rules for raw water transfers were pre-agreed in writing with the EA. There were regular meetings with Defra which helped navigate risks and issues. See above comment on the protracted application process.

Appendix 9.1: Changes from Drought Plan 2022

Our DP27 has been updated to reflect the latest regulatory guideline requirements and changes we have made based on learning from actual droughts since the publication of our DP22. The key changes are listed below.

- The main Drought Plan document content has been updated to align with the recommended structure in the EA's Drought Planning Guidelines 2027 (DPGL27).
- Our drought triggers and actions have been updated to align with the drought stages and levels defined in the EA's DPGL27 and its policy paper on drought management[8].
- Drought modelling data has been updated to include 2025 data.
- Our approach to drought triggers has been updated to align with the EA's drought stages. See Appendix 9.2 for further information.
- Information on demand-side options including the saving assumptions, non-household options and pressure reduction has been revised and expanded.
- The drought management structure has been updated to align with recent events.
- Level 3b actions have been reviewed. This resulted in the addition and removal of a number of options based on modelling improvements, environmental assessments and the strategic resource option schemes that are being progressed as part of water resource planning.
- A table has been added to Appendix 7 explaining how the DP27 aligns with the WReN statement of intent
- The customer summary document has been updated and expanded in line with the EA's DPGL27.
- Environment Assessment reports and Environmental Monitoring Plan for our supply-side drought permits / orders have been updated based on feedback during discussions with the EA incorporating lessons learned from the previous years.

[8] **gov.uk/government/publications/drought-management-for-england/drought-how-it-is-managed-in-england**

Appendix 9.2: Drought trigger changes

Our drought triggers are described in Section 2 of our DP27 main document. We have updated our approach to represent the drought stages as defined by the EA and to take into account learning from 2022 and 2025. Table 24 describes how the bands compare to the draft DP27 triggers.

Drought status	Draft DP27 trigger	Revised draft DP27 trigger band
Normal	Above EA Early Warning Control Line. Note in DP22 normal status was above the normal control line and this change was made at draft.	Above control line 4, which was the EA Early Warning Control Line and therefore there is no change to the draft position.
Level 1	Crossing of EA Early Warning Control Line. Note in DP22 level 1 was triggered on crossing the normal control line and this change was made at draft.	The upper boundary of drought level 1 is control line 4, which was the EA Early Warning Control Line therefore there is no change to the draft position.
Level 2	Regional reservoir stocks or three of our five reservoir groups are forecast to be six weeks from crossing the drought control line.	Midway between control lines 5 and 6.
Level 3a	Regional reservoir stocks at or close to crossing the drought control line (control line 7).	Midway between control lines 6 and 7.
Level 3b	Regional reservoir stocks are forecast to be four weeks from reaching level 4	Control Line 8.
Level 4	Regional reservoir stocks reach 20 percent of the total reservoir storage.	Regional reservoir stocks reach 15 percent of the total reservoir storage (Control Line 10).

Table 24 Comparison between the draft DP27 and revised draft DP27 triggers

Level 1 (yellow)

The normal status and the trigger for entering level 1 drought status are unchanged from draft. Level 1 drought in the draft DP27 was based on the actual crossing of the EA Early Warning Control Line (control line 4) and this is now the upper boundary of level 1 drought.

Level 2 (amber)

For the revised DP27 we define the level 2 (amber) trigger as being midway between control lines 5 and 6. This means it is now based on actual reservoir

levels rather than forecasting the crossing of control lines, which is scenario dependent and can change from week to week if demand varies to that predicted and/or we receive some rainfall.

Crossing into this band does not automatically mean that level 2 restrictions (TUBs) are implemented, but it does indicate that level 2 restrictions will be considered and may be implemented when other evidence is taken into account. We have carried out analyses that indicate that the frequency of TUBs will be similar to our previous level of service (Section 1.4.2). This change has the advantage of making the trigger clearer, as it would be based on actual reservoir stocks reaching a band rather than predicted stocks reaching the DCL in the future (assuming historical minimum inflows). It is envisaged that a TUB would be triggered within a couple of weeks of stocks entering the band, or when stocks are 2-3% into the band, although this would depend on other factors such as time of year, weather forecasts and simulation modelling, and a TUB would generally only be implemented during the April-September TUB season.

Level 3a (amber)

We enter level 3a when regional reservoir stocks are midway between control line 6 and control line 7. Control line 7 is the drought control line. Level 3a actions require drought permits and orders to be phased as it is not possible to implement all on the crossing of a single line. Our new approach means the phasing of level 3a actions may begin when stocks are above the drought control line.

The change from predictive crossing of the drought control line to a band more closely reflects the actions we have taken in recent droughts, where implementation of drought permits has occurred before the drought control line is crossed in order to account for the considerable timescales involved in applying for drought permits and orders. We would expect the majority of permits required to be implemented at some point within the band subject to authorisations being granted.

Level 3b (red)

Level 3b represents a severe drought and we enter this stage when reservoir stocks are below control line 8. This approach provides a clear definition of level 3b, whereas previously, it was based on stock levels being forecast to be four weeks from level 4.

Level 4 (red)

We enter level 4 if regional reservoir stocks reach control Line 10 which is when regional reservoir stocks are at 15 percent of the total reservoir storage capacity. Emergency storage is estimated to be at 15% of total reservoir stocks following a review of reservoir capacities and draw-off levels in 2026. The emergency storage will also include the "dead storage", which is the unusable water that is either untreatable or below the lowest draw-off point. The emergency storage includes 30 days of supply and compensation flows above the dead storage.

The review of dead and emergency storage has resulted in our Level 4 trigger changing from 20% of regional stocks to 15% regional stocks. This is based on improved information relating to reservoir dead storage. We have assessed the impacts on Deployable Output (DO) modelling and found no significant change in DO (1 Ml/d for a 1 in 500 year return period DO, and 3 Ml/d for a 1 in 200 year return period DO- 0.2%) due to other model improvements and simplified return period analyses.

Our modelling shows a repeat of any droughts in our historical record would not reduce reservoir levels to 15 per cent and level 4 restrictions would not be required even at relatively high demand levels, although modelling using stochastic inflows do see stocks at that level.

When reservoir stocks enter level 4, we will transition from our Drought Plan into our Emergency Drought Plan.

Review of 2025 using the new drought triggers

Figure 21 shows the reservoir stocks in 2025. The regional stocks cross into the level 2 band in early July, and the decision to implement a TUB would have been made soon after that, with a TUB being implemented at a similar time to the triggers based on the forecast in 2025. The blue arrows on the graphs show when a TUB would have been triggered and when implementation of the drought permits and orders would have started.

This change to using drought level bands for level 2 and 3a triggers rather than the forecasts would clarify the timings of triggers but would not have changed the actual timing of triggers. The 2025 TUB started 11th July and permit implementation from late August into the autumn when we received sufficient rainfall and stocks recovered.

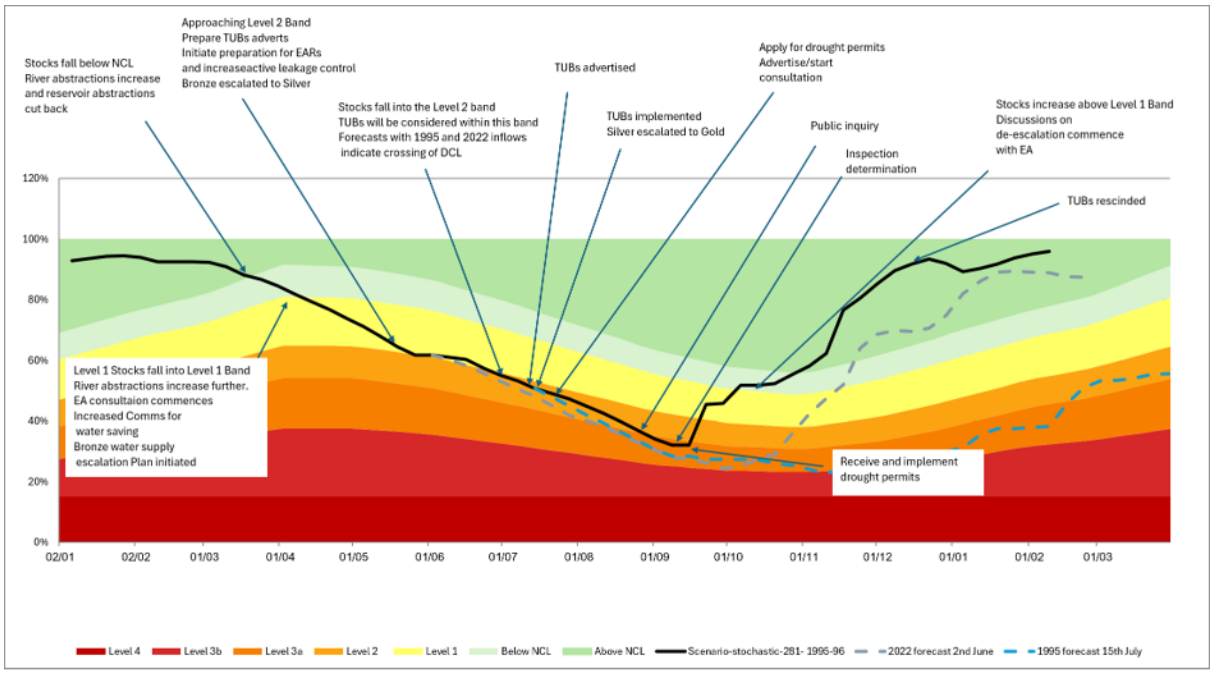


Figure 21: Reservoir triggers

Appendix 10 – References

We have added links and footnotes in the main drought plan and in appendices for documents that we have used when preparing this plan. In addition to those documents, we have also taken account of the following documents:

- Consumer Council for Water drought communications toolkit (2023) – flexible messages with a toolkit and social media assets that can be downloaded here (not accessible by the public) Drought campaign - assets, messaging and tools | Trello
- Consumer Council for Water report findings on consistent messaging Consistent Messaging - CCW
- Drought Risk and You (Dry) publications, About drought handbook, 2021, available here: https://aboutdrought.info/wp-content/uploads/2021/02/aboutdrought-handbook_FINAL_2020-1.pdf
- Environment Agency and Ipsos: Perceptions of Temporary Use Bans (Hosepipe Bans) - draft May 2026 report provided by the EA
- Environment Agency's drought plan: provided by the EA
- Environment Agency's Chief Scientist's Group, Review of the research and scientific understanding of drought - 2023 available on GOV.UK here: Review of the research and scientific understanding of drought: summary report - GOV.UK
- Environment Agency's The National Framework for Water Resources (2025)
- Government communications service evaluation guide Monitoring and evaluating government communications activity - GCS
- Market Operator Services Ltd (MOSL) drought playbook 2025 MOSL Drought Playbook
- Reviewing Approaches for communicating Drought status And Risk (RADAR) project (2025) – the final report includes the key messages and recommendations : https://sciencesearch.defra.gov.uk/ProjectDetails?ProjectId=21729
- UKWIR report 26/WR/02/22-1 A Review of the Impacts of Communications Campaigns and Temporary Use Bans In 2025, Summary Report
- UKWIR report: 'Managing through drought: code of practice and guidance on water use restrictions – 2023' Update to the Drought Code of Practice 2013

- UKWIR report: 'Review of 2022 Drought Demand Management Measures – summary report': Review of 2022 Drought Demand Management Measures - Summary Report
- Water Resources in the North (WReN) 2025 Drought group statement of intent: https://www.waterresourcesnorth.org/globalassets/water-resources-north/wren-drought-group-statement-of-intent---v2-final.pdf

Thank you

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