



SES Water Draft Drought Plan 2021

Statement of Response to Representations Received during Consultation



Issue 1: 20 September 2021

1. Introduction

This document sets out the response of SES Water to the representations received on our Draft Drought Plan issued for consultation in June 2021. The consultation period closed on 2 August 2021.

The Company received five bespoke responses to the consultation, from the following organisations:

1. Horticultural Trades Association (HTA)
2. Natural England (NE)
3. Historic England (HE)
4. Environment Agency (EA)
5. Consumer Council for Water (CCW)

Our response to each point raised in these representations is given in Section 2.

We also received feedback via a list of set questions from 17 individuals, 15 received through an online portal and two via email from members of our Environmental Scrutiny Panel. The results are presented in Section 3.

In addition, we carried out a webinar with Retailers in collaboration with other companies in the Water Resources in the South East (WRSE) group. This is detailed in Section 4.

Finally our next steps after publication of this Statement of Response is given in Section 5.

2. Bespoke Representations Received

These are detailed in tabular form in the remainder of this report. Our response to each representation, and whether the Plan has been amended, is given. Note that we have summarised the comments received for the purpose of clarity. Full representations are available on request.

Ref	Representation	SES Water Response	Change Plan?
1 Horticultural Trades Association			
1a	That the devastating impact of a ban on 'watering outdoor plants on commercial premises' on our members be recognised in the plan, and that an exemption for horticultural businesses be introduced in non-essential use bans.	We work closely with the other companies in WRSE to align the discretionary exemptions associated with the implementation of temporary restrictions, in order to apply a consistent approach across the region. Our approach seeks to balance the need to reduce demand for water in a drought while mitigating any disproportionate socio-economic impacts. We recognise the concerns of the members of the HTA of the impacts of restrictions, but our responsibility is to maintain supplies for essential purposes during drought conditions, as well as balance the needs of the environment, and these measures are considered necessary. We will continue to work together with our neighbouring companies in the South East to assess whether certain projects which are designed to benefit the environment can be included in our agreed discretionary exemptions, and if so will include this in future updates to our drought plans.	No
1b	That the temporary provision for 'watering newly bought plants for the first 28 days after the ban is introduced' be nuanced so that irrigation of plants and trees being introduced to green infrastructure projects can continue, and that longer term environmental benefit is not lost.		
1c	That SES Water (and other water companies) work with us to accelerate the introduction of measures and best practice that will reduce our members' reliance on mains water. This includes support for water capture infrastructure projects, such as more self-sufficient water systems like reservoirs and efficient irrigation systems.	We welcome any measures that reduce reliance on mains water. Our <i>Every Drop Counts Community Fund</i> is open to public sector and charitable organisations that have projects which capture rainwater or greywater or improve efficiency. For commercial properties, we would be able to offer advisory support, with a potential for partnership working on infrastructure projects subject to alignment with our Business Plan objectives.	No

Ref	Representation	SES Water Response	Change Plan?
2	Natural England (summary points – additional details from Annex in brackets)		
2a	The dDP has been partially considered under the Conservation of Habitats and Species 2017 Regulations as amended, known as a Habitats Regulations Assessment.	Please see response to 2b below.	Yes
2b	<p>An HRA has been attempted but it has been mislabelled. The dDP states that there are no Habitats sites which are affected by drought permits. If this is the case then there is no need to undertake an appropriate assessment. However the HRA screening should be a clear section of the dDP, and it must be clear that a likely significant effect on Habitats site has been excluded on the basis of objective evidence. This screening is not presented in the dDP.</p> <p>[An HRA has not been submitted with the current dDP. However, we note that SPAs, SACs and Ramsar sites have been screened within the Environmental Assessment Reports undertaken to support the dDP and the drought permits / options selected.]</p>	<p>In section 5.1.3 of our Draft Drought Plan we summarise the Habitats Regulations Assessment findings as presented in the Environmental Assessment Reports (EARs) for each of our five drought permit options. These findings indicate that there are no internationally designated sites identified as affected by either the groundwater or surface water drought permits. The relevant sections of our EARs which contain the detail of the assessments undertaken are as follows:</p> <ul style="list-style-type: none"> • River Eden May and Summer drought permit EARs: section 4.3.2.1 • Kenley and Purely drought permit EAR: section 4.5 • Outwood Lane drought permit EAR: section 4.5 • Hackbridge drought permit EAR: section 4.5 <p>We propose to produce a clearly labelled summary of the HRA screening process and outcomes in our Revised Draft Drought Plan. This will likely form an appendix to the plan, which will be signposted from section 5.1.3 in the main report. We will extract relevant information from the drought permit EARs to provide clearer evidence of the assessment that there is no likely significant effect of the Drought Plan on any Habitats Directive sites.</p>	Yes, HRA screening summary to be added

Ref	Representation	SES Water Response	Change Plan?
2c	<p>The dDP contains groundwater abstractions and options which may have a likely significant effect on the environment and therefore should have an SEA. See Annex 1 for details.</p> <p>[There is limited environmental evidence presented to provide Natural England with confidence that a strong environmental baseline has been established from which to draw conclusions within the drought permits']</p> <p>[The options in the SES plan have the potential to act in combination and cumulatively with other plans or projects in particular other companies drought plans. For example cumulative impacts have been identified between Thames Water's Waddon dDP option and drought options in the SES dDP. NE advice is the company should include a full in combination and cumulative impact assessment in its SEA before the final plan can be published.]</p>	<p>Our interpretation of the SEA legislation was that our Draft Drought Plan did not set a framework for future development consent because it is a temporary operational plan, and the drought permits, if needed, would only be operational for a short period of time. However, further to your consultation response, and following discussion with other companies within the Water Resources in the South East regional planning group, we accept that there is a legitimate basis for doing an SEA of our Drought Plan because it contains drought permit options related to groundwater abstractions (albeit existing ones). We therefore propose to undertake an SEA of our Revised Draft Drought Plan. Considering resourcing constraints and the time it will take to complete a full SEA, we will endeavour to complete it by the end of May 2022.</p> <p>Our SEA will be developed with reference to the UKWIR Environmental Assessment Guidance for Water Resources Management Plans and Drought Plans 2021 and will include, where relevant, assessments of (as listed in Annex 1 to Natural England's consultation response):</p> <ul style="list-style-type: none"> • Protected landscapes; • SSSIs (nationally designated sites have been already assessed in our drought permit EARs); • Priority habitats and species (priority habitats and species have been assessed in distinct sections within our drought permit EARs); • Climate change; and • Marine Conservation Zones. <p>Much of the information that will be used to inform the SEA will be obtained from the published EARs for our five drought permit options.</p>	Yes, SEA to be added

Ref	Representation	SES Water Response	Change Plan?
2d	The dDP has not been considered under UK legislation by The Environmental Assessment of Plans and Programmes Regulations 2004 SO No. 1633 (Strategic Environmental Assessment (SEA) process).	Please see response to 2c above.	Yes
2e	The dDP has mostly selected options with the least / lesser environmental impacts in preference to those with greater impacts – focusing on reducing demand before increasing abstraction. [It's noted that details of actions taken in response to Level 0 being triggered have not been included yet. NE welcome discussions on potential messages which would be beneficial to the environment and recommend the company works across the region on joint messaging.]	We welcome support for options with lesser environmental impacts, including those relating to reducing demand. We have been actively participating in WRSE drought working group discussions exploring how we can work with the other five companies in our region during droughts, particularly around joint messaging. We also, as stated in Section 1.4 of our Draft Drought Plan, participate in regular WRSE 'dry weather' meetings. We would welcome the opportunity to review further with Natural England, and other stakeholders as necessary, the potential for joint messages associated with Level 0 actions that would be beneficial to protecting the environment, especially chalk river catchments, in the next iteration of our Drought Plan.	Yes, additional detail to be added to Communications Plan.
2f	The dDP does not have a net gain assessment or natural capital assessment. The company should explore additional resilience measures with a view to enhancing the environments reliance to the drought options and provide mitigation of impacts once these are assessed. [It would be useful for the water company to conduct a natural capital assessment and to explore habitat enhancement options that make the environment and their assets more resilient to drought and climate change.]	We are assessing natural capital and net gain as part of our overall approach to water resources through the Water Resources Management Plan 2024 (WRMP24) statutory process. Our Draft Drought Plan 2021 options form part of our WRMP24 and we look forward to engaging with Natural England during that process. We will explore opportunities in future iterations of our Drought Plan to incorporate the approaches to natural capital and net gain developed for WRMP24.	No

Ref	Representation	SES Water Response	Change Plan?
3 Historic England			
<i>Note: reference to 'Sutton and South East Water' in the consultation response was taken to mean Sutton and East Surrey Water.</i>			
3a	[The Drought Plan should consider] the potential impact of water catchment and abstraction measures on heritage assets and their settings, including impacts on water-related or water dependent heritage assets	It is considered unlikely that our groundwater or surface water drought permits would result in any impacts on heritage assets. Groundwater levels and river flows should be within the range experienced in a drought situation even without the permits being in place. In addition, the drought permit on the River Eden is limited by a 'hands-off' condition preventing abstraction if flow drops below a minimum level.	Additional wording to be added
3b	[The Drought Plan should consider] the potential impact of changes in groundwater flows and chemistry on preserved organic and palaeoenvironmental remains; where ground water levels are lowered as a result of measures to reduce drought, this may result in the possible degradation of remains through de-watering, whilst increasing groundwater levels and the effects of re-wetting / changes in salinity brought about by coastline modification could also be harmful	As stated in response to Q3a, it is not expected that groundwater levels or river flows would be below the minimum which would occur naturally as a result of a drought. Whilst the effect of drought permits would lower groundwater levels and river flows to an extent, it is considered the risk of impact on remains would be extremely low. Since none of our permits are within a coastal or estuarine region, a change in salinity would not be applicable.	No
3c	[The Drought Plan should consider] the potential impact of hydro-morphological adaptations on heritage assets: this can include the modification / removal of historic in-channel structures, such as weirs / coastal and estuarine features such as historic sea defences; as well as physical changes to rivers / the coastline with the potential to impact on archaeological and palaeoenvironmental remains	The drought permits in our plan does not include any modification or removal of in-channel structures. We consider that the likelihood of physical changes to rivers resulting from the application of our drought permits is very low given the natural range in flows during drought conditions. As stated in Q3b, there are no coastal features in our supply area.	No

Ref	Representation	SES Water Response	Change Plan?
3d	[The Drought Plan should consider] the potential for unrecorded deeply buried and waterlogged archaeology within the 'natural' floodplain/ estuarine/ coastal deposit sequence	Clearly it is difficult to mitigate the risk of possible unrecorded archaeology at any particular site. However, we consider that the impact of our drought permits is very unlikely to lower river levels to the extent that any buried remains would be uncovered or disturbed. For example, as stated in Q3a, the operation of the drought permit on the River Eden is limited by a 'hands-off' flow condition.	No
3e	[The Drought Plan should consider] the opportunities for conserving and enhancing heritage assets as part of an integrated approach to drought management, this includes sustain and enhancing the local character and distinctiveness of historic townscapes and landscapes	We consider that opportunities to enhance townscapes and landscapes is more relevant to our Water Resources Management Plan (WRMP) than our Drought Plan. For example, in the WRMP we evaluate environmental and social benefits of new supply or demand options, including impacts on local communities either negatively or positively.	No
3f	[The Drought Plan should consider] the opportunity for increasing public awareness and understanding of appropriate responses for heritage assets in dealing with the effects of drought as well as the design of measures for improving resilience	Since we consider that the impact of our drought plan on heritage assets is very low, it is not appropriate to include any reference to such opportunities. However, we agree that measures could be taken by relevant authorities or owners of the land in which assets are located by identifying any risks resulting from low groundwater / river levels or prolonged dry weather, particularly where coupled with high temperatures.	No
3g	[The Drought Plan should consider] the opportunities for improving access, understanding or enjoyment of the historic environment and heritage assets as part of the design and implementation of flood risk management measures	Our Drought Plan does not include any measures relating to flood risk management, and therefore we would be unable to include any such opportunities. However, as with the effects of drought on heritage assets, flood risk is clearly a significant risk and should be assessed by landowners with such assets.	No

Ref	Representation	SES Water Response	Change Plan?
4 Environment Agency (summary points – additional details from Annex in brackets)			
4a	<p><i>Recommendation 1 – include all the measures to monitor, prevent and mitigate any adverse impacts on the environment from your drought management measures (linked to Direction 3(g))</i></p> <p>SES Water has not set out all the monitoring needed to detect any adverse effect on the environment resulting from its drought management measures. It is likely that the application of the drought actions over consecutive years would result in a greater reliance on the augmentation scheme, increasing proportions of river surface water being circulated and impacting on water quality parameters, such as temperature.</p> <p>The water company must improve its monitoring plan for the River Wandle abstraction licence for the Hackbridge drought permit site. It must review whether any changes in the augmentation scheme, which is to help assure the licence condition is met, will have impacts on the River Wandle during a low flow.</p> <p>[The EAR needs to be based on up to date data and have a very robust monitoring scheme which should be detailed in the plan. It is essential that River Habitat Surveys (or an equivalent fluvial audit technique containing both basic botanical and geomorphological counts) are conducted both before and after the drought permit to check that there has been no significant change in the number of features.]</p>	<p>In our Hackbridge drought permit monitoring plan (Draft Drought Plan 2021 - Appendix H: Table 5-1) we will commit to undertaking a post-drought River Habitat Survey on the River Wandle and compare results with the baseline survey that we have already committed to carrying out once per Drought Plan cycle.</p> <p>This will complement the water quality monitoring already proposed before during and after the drought permit as part of our monitoring plan. If any changes are observed, we will explore whether it is possible that these are attributable to the operation of the drought permit rather than to the natural variability expected during a drought, albeit that this is likely to be difficult to ascertain with confidence. However, it may help improve understanding of whether, following a multi-season drought if the drought permit is applied for and granted in consecutive years, increased use of the augmentation scheme has impacts on the River Wandle.</p>	<p>Yes, post RHS to be added for Hackbridge Drought Permit</p>

Ref	Representation	SES Water Response	Change Plan?
4b	<p><i>Improvement 1 – Set out how security of supplies will be maintained during peak demand and heatwaves</i></p> <p>SES Water has not included any worked examples or scenario testing of high demand or a heatwave in its draft drought plan. The company should update its plan to show that it can manage these high demand and heatwaves scenarios during dry weather/drought without loss of supply or over abstraction. These actions can include optimising the use of its network of sources, temporary use bans and additional communications to reduce demand.</p>	<p>There may be a requirement to communicate with our customers to request that they take steps to reduce demand in circumstances where there is not a drought or a threat of drought. This could arise due to a period of high demand that puts stress on the water treatment or water distribution infrastructure, or it could be due to a period of outage at a water treatment works or a failure of a strategic main. Under such circumstances it would not be appropriate to implement drought measures to restrict demand such as implementation of a TUB as the situation would not have arisen due to an exceptional shortage of rain.</p> <p>Therefore, the implementation of a tailored communications campaign is the best means of trying to achieve a reduction in customer demand in such circumstances and a short lived and targeted campaign using the most appropriate means of communications would be used in these circumstances. It is likely that the use of social media and methods such as text messaging could be used during a campaign of this type. This type of communication was used in the high demand situations experienced in 2018, 2019 and 2020. This approach would also be used in a situation where unforeseen circumstances may occur such as in 2020 as a result of Covid19 which led to high demand in parts of our supply area which when coupled with very hot weather led to stress on our operational network. In these circumstances it is necessary to mobilise a communications campaign quickly, this process is known as 'agile comms'.</p>	No

Ref	Representation	SES Water Response	Change Plan?
4b cont		<p>Further, we demonstrated that our plan was resilient against the 2018 summer peak, when hot, dry conditions led to high demand for a sustained period, in Section 4.2.1. We consider this to be a good example of a high demand scenario, with details of actions taken in that period including a summary of the analysis undertaken by Artesia using several companies' data.</p> <p>We refer to the optimisation of our network, as well as TUBs and additional communications in the sections relating to actions taken from Levels 1 to 4.</p> <p>Therefore we consider that any further analysis of similar examples would not provide any additional benefit in terms of our operational response to a drought.</p>	

Ref	Representation	SES Water Response	Change Plan?
4c	<p><i>Improvement 2 – show how the impact of communications on the demand for water will be monitored and used</i></p> <p>SES Water has included agile communications in its draft plan but it has not included any assessment/ overall evaluation of the effectiveness of using them. The company should update its draft plan to set out clearly how the results of agile communications will be measured. This should include how it will share this information with the Environment Agency in time for decisions to be made about when to implement drought actions.</p>	<p>We will update the plan to include more details of how we would evaluate the customer response to different types of communication.</p> <p>We have set out how we would monitor the effectiveness of our agile drought communications in the 'Evaluation' section of our Communications Plan (Appendix D). This includes use of measures such as website/social media data capture, engaging with our 'Talk on Water' online customer community (possibly before and after drought to see if their actual responses were as they thought they would be) and monitoring registrations and enquiries about water saving devices and our water use calculator. During a drought, the demand data that is already collected and held by our Operations Statistician (and reviewed weekly by the Water Strategy Manager) will be analysed to potentially identify any step changes in demand immediately following drought communication activities. We will include a running graph of this information at an appropriate spatial scale to any drought-specific communication activities that we have undertaken (e.g. if we send out a text message to customers in a certain district) mapped onto the time axis in weekly reports that we would be shared with the Environment Agency. This will help inform decision-making about implementation of other drought management actions.</p>	<p>Yes, additional detail to be added to communications plan</p>

Ref	Representation	SES Water Response	Change Plan?
4c cont		<p>We will consider undertaking post-drought surveys of our customers to help gain an understanding of how they reacted to the agile drought communications we used during the drought and whether they felt they changed their water use as a result. Albeit qualitative, this information will help shape future design of drought management communication activities.</p> <p>Additionally, as part of WRSE we have supported the commissioning of a project that will analyse the savings from drought demand management measures implemented in the past.</p> <p>We will incorporate the outcomes of this project, when available, in future iterations of our Drought Plan.</p> <p>We will ensure this information is clearly presented in our Revised Draft Drought Plan.</p>	

Ref	Representation	SES Water Response	Change Plan?
4d	<p><i>Improvement 3 – review the plan so it is more tactical and operational</i></p> <p>The company’s plan forms a good basis for a tactical and operational plan. Following our review, the company should consider further opportunities to simplify the document and reduce some of the technical details which will make it easier to follow. The plan should include clear actions that will be taken at each stage as a drought progresses.</p> <p>[The company’s plan forms a good basis for a tactical and operational plan. However, there are some technical details e.g. under testing the drought scenarios and throughout the plan, that if simplified or shortened it would help making the plan clearer and simpler for the customers. This would be for the benefit of different customers and stakeholders to understand the decision making and actions needed to be taken during a drought.]</p>	<p>We will consider where it would be possible to shorten some technical details, or move them to appendices, for the purposes of clarity to customers and stakeholders. We have committed to producing a Non-Technical Summary (see response to Question 5a), which would lessen the need for a simplified main document.</p> <p>The plan should be sufficiently detailed to provide the process for, and evidence to substantiate, the decisions made at each stage. Therefore there is a risk if we remove information that is needed for this purpose. For example, whilst we have included all the factors used to determine the sequencing of drought measures, we consider this has the benefit of demonstrating transparency of our decision-making.</p>	Where relevant.

Ref	Representation	SES Water Response	Change Plan?
5 Consumer Council for Water - selected responses to consultation questions			
5a	In our view, the final Plan must be accompanied by a clear and accessible non-technical summary, for customers who are less aware of the technical issues and terminology used in the Plan. We have reviewed the consultation document on the assumption that this is the basis of such a summary.	We will produce a Non-Technical summary to accompany the main Drought Plan, in a form that is based on the consultation document.	Yes, Non-Technical Summary to be added.
5b	Both the full-length Plan and the shorter consultation/non-technical summary are clearly written. However, we feel there could be more consideration of vulnerable customers and the impact of drought on different groups of customers both household and non-household.	We will review how we can enhance the plan to consider vulnerable or different customer groups more clearly, whilst continuing to ensure the plan is fair across all customers. The exemptions and stepped approach to restrictions is designed to take account of specific needs in terms of disability or financial impacts in balance with those from the environment. We consider the impact of measures on householders up to Level 3a are relatively minor. Support would be provided as needed as the drought progresses and the need for more stringent measures are necessary.	Where needed.

Ref	Representation	SES Water Response	Change Plan?
5c	<p><i>Q1: Drought Phases</i></p> <p>There could be more explanation of what would happen in an emergency drought situation.</p> <p>In particular, we feel that the switch between using ‘levels’ and ‘zones’ is unclear. We think there needs to be a consistent use of one, or a clear explanation of the difference between them.</p> <p>We would like to see ‘Level 0’ or ‘No drought’ activities covered in the Communications Plan at appendix D. This is mentioned in the consultation / non-technical summary but it would be helpful to include details of what communications and activities look like at this stage in the Communications Plan. This would make it easier for customers to understand what the difference in activity would be once the drought risk is increased.</p>	<p>We agree that some additional information could be added to the Section on Level 4 measures, including how it links to Level 3b measures and how pressure reduction could be managed.</p> <p>It was not intended that the use of both terms ‘levels’ and ‘zones’ should cause any confusion. Since there is no difference between the terms, we will use ‘level’ throughout the document to be consistent and in line with the guidance.</p> <p>We will add additional information to the communication plans regarding Level 0, where there may be environmental impacts where groundwater is lower than average. This is also discussed in Section 3.</p>	Yes
5d	<p><i>Q7: Water rationing</i></p> <p>We feel there could be more details in the Plan about the process that would be followed if an emergency drought situation arose, and how this would be managed and communicated to customers.</p>	<p>As stated in relation to Q5c, we will add more information on Level 4 communications.</p>	Yes

Ref	Representation	SES Water Response	Change Plan?
5e	<p><i>Q8: Communication methods</i></p> <p>It is good that you have mentioned the use of methods of communication. Please ensure that those who are digitally excluded are also considered when communicating with customers.</p> <p>We would like to see communications that are clear, and that ensure customers are fully aware of the actions that they are being asked to take at different stages of drought.</p> <p>CCW are supportive of the collaborative work you have been doing with the WRSE to ensure that communications with other companies in the South East are aligned, particularly when a drought situation is developing. This will be particularly important when customers live on the boundary of two water companies in the region.</p>	<p>This point is in line with others received in our survey. We will provide more detail to demonstrate that we will accommodate all customer groups in our communications, including those that do not have access to digital methods.</p> <p>We recognise that clarity of messages and calls to action is of fundamental importance. We have learnt this from previous drought events and is partly why we are working with the other South East companies to improve consistency on exemptions and in other areas. Without this, customers are more likely to be confused and there may be perceptions of unfairness in comparison to other companies' policies and plans.</p> <p>As a drought progresses, there would be increasing liaison between companies in the region, along with the regulators including CC Water, to agree on the details of customer communications and develop a media plan which looks at different possible outcomes. Having pre-existing groups set up across the South East – both technical and on customer engagement – provides a platform on which each stage can be carefully co-ordinated.</p>	Yes

Ref	Representation	SES Water Response	Change Plan?
5f	<p><i>Q9: Other comments</i></p> <p>We feel that the Plan could be improved by providing more detail in respect of the following points:</p> <ul style="list-style-type: none"> • How does the Plan reflect customer views and priorities? How has research been used to inform the development of the plan? • What problems does SES foresee in communicating during a drought, e.g. high volumes of communication? How do you plan to address these? More detail on the support for vulnerable household and non-household customers and what special arrangements would be put in place for customers who need assistance • As set out in the Water UK/UKWIR Code of Practice on Temporary Use Restrictions, there could be more consideration of the impact of any measures on different customer groups. • What engagement with stakeholders and different interest groups has been undertaken in developing the Plan? • How will SES work with Retailers to target communications (prior to and during drought) to different types and sizes of non-household customers? How is SES encouraging non-household customers to consider their own resilience to drought? • Where there are NAV arrangements in place, what has SES done to ensure that appropriate messages about drought will reach these customers? How will you ensure that any NAV appointees in your area will be encourage their customers to take the appropriate action during drought? 	<p>Customer research has been carried out during the consultation phase of the plan. This included a focus group that was also asked for opinions on other related areas including carbon and resilience. The development of an easy-to-read consultation document was designed to encourage feedback to be given. We also took part in a webinar for Retailers as detailed in Section 4. We plan to continue exploring ways to gain feedback, for example through our ‘Talk on Water’ online group which includes both household and non-household business customers.</p> <p>We are also targeting specific business customers, such as golf courses and sports ground owners, to develop improved water efficiency projects and data gathering as part of an industry-wide collaboration.</p> <p>We plan to communicate with customers both individually, using their existing preferred lines of contact for billing, and more widely through the media and disseminating information through community groups and local government. We already have existing contacts in place that will assist with this. As detailed in the response to Q5b, we will consider if the plan would benefit from more explicit reference to support for vulnerable customers. This would also be in line with the Code of Practice referred to.</p> <p>We have recently begun developing our approach to NAV appointees with respect to water efficiency and drought measures, which will become more significant as the number of appointees grows from the current small base.</p>	Minor changes in wording.

3. Section 3: Survey Responses

We created an online survey which was open throughout the consultation period. A customer friendly consultation document (see Appendix A) was available to download which summarised the Drought Plan for context with the questions. Customers that we invited to take part in a series of online focus groups in July & August were asked about their opinion of the consultation document as well as drought planning in general, and encouraged to submit a response formally.

The questions were as follows, with the percentage of respondents answering ‘Yes’ given alongside. Questions 1 to 7 were ‘Yes / No’, with questions 8 and 9 open text.

Ref	Question	% Yes
1	<i>Do you understand the different phases of drought and the action we will take at each?</i>	82%
2	<i>Do you understand what activity is not allowed under a Temporary Use Ban and a Non-Essential Use Ban?</i>	71%
3	<i>Do you agree with the automatic exemptions from restrictions on using water?</i>	94%
4	<i>Do you agree with the discretionary exemptions from restrictions on using water?</i>	88%
5	<i>Do you agree that we should not apply for a drought permit until Temporary Use Bans are in place - so we are taking measures to reduce demand before we take more from the environment?</i>	100%
6	<i>Would you be willing to limit your water use to 50 litres per day to help avoid water rationing being introduced?</i>	76%
7	<i>Do you think it is ever acceptable to introduce water rationing such as standpipes or rota cuts?</i>	71%
8	<i>How best can we communicate with customers during a drought?</i>	n/a
9	<i>Do you have any other comments about our drought plan?</i>	n/a

The full results including comments are given in Table 3. Whilst the sample size is small, it is indicative of the relative support for different areas of the plan.

The questions which received high levels of support, of over 85%, involved the automatic and discretionary exemptions, as well as taking measures to reduce demand before taking more from the environment. This suggests that customers are considerate of those who need to be exempted even if this means they are required to have their own water use restricted. One respondent who did not support the exemptions qualified this to state that it was specific exemptions they did not support – namely cleaning companies, commercial plant, new turf/plants, religious features, window cleaning and graffiti removal.

Receiving a high level of support for taking actions that affect customers before the environment shows how they value their local environment above their convenience or comfort. This part of the plan also received support from CC Water.

Table 3: Survey responses

Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9
Yes	Yes	Yes	Yes	Yes	No	No	Letters, text messages	No
Yes	Show images of wildlife suffering because of our actions.	I don't think you should be allowed to extract water from rivers and other watercourses at all. I also don't think you should automatically agree to supply water to new housing estates, putting the environment under even more stress. It's ludicrous that you just agree to supply water endlessly. Grow a back bone!						
No	No	Yes	Yes	Yes	No	Yes	social media/facebook/news/Parish Clerk/environment groups.	Q6: Rationing - This question is not clear; 50l per household (based on how many?) or per person? if you restrict use, I interpret this to be rationing!
Yes	Yes	Yes	Yes	Yes	No	No	Send news updates to parish councils via email to enable bulletins to be issued via parish council email groups to residents. Continue to post updates on your website. Dont assume everyone uses social media and fall into the trap of targeting a small section of your customers by focusing on facebook and twitter.	It is galling for proactive communities such as Buckland to be asked to sign up to using no more than 50 litres a day at the same time as SES Water fails to mend reported leaks. Just how much water has been lost via the leak at the pumping station on Lawrence Lane (2 years and counting) ? How many times should residents be expected to report leaks before SES Water sorts out a permanent fix - most recent examples include junction of Dungalas Lane and Old Rd (ongoing) and the railway bridge on Lawrence Lane (temporary fix pending permanent solution).
Yes	No	Yes	Yes	Yes	Yes	Yes	Radio	No
Yes	Yes	Yes	Yes	Yes	No	Yes	Through already agreed processes and set out within our MOU with SES Water	
No	No	Yes	Yes	Yes	Yes	Yes	Email	
Yes	Phone	No						
No	No	Yes	No	Yes	Yes	No	E mail or text	
Yes	Social Media, leaflets, local radio, text messages, email,	Horley Town Council considers that water conservation and leak reduction are very important in increasing resilience to assist in drought management and hope that SES water will continue to set and meet challenging targets in this regard.						
Yes	Yes	Yes	Yes	Yes	Yes	No	Through letters to each household and through FaceBook community pages as well as the Local District Council	Rather lengthy, so a summary leaflet would be good to introduce on your website
Yes	Yes	Yes	Yes	Yes	Yes	No	Social Media and Television	I do see that it is needed. When necessary.
Yes	No	Yes	Yes	Yes	Yes	Yes	email or telephone	
Yes	As many channels as possible - use partners to get the messaging out to vulnerable customers as well as using billboards, SMS, social media and emails	Priorities in a drought should be (1) vulnerable customers and communities and (2) minimising the impact on the environment - don't make it worse for vulnerable species of animals and plants in environmentally sensitive areas by taking more water than absolutely necessary. If we can cope with COVID we can cope with bottled water and standpipes for a while						
Yes	telephone and email	no						
Yes	Multiple approaches are needed to reach different types of customer: billboards, text messages, leaflet drops, social media and local radio. It's important that the messaging is appropriate for the time of year and target group. This seems to be covered in your plan. However, I was shocked to see that the savings from even well managed customer awareness programmes is so low that the savings are not included in the plan. Has sufficient research been done into what messaging works best and why the response is so poor - is there support nationally for customer awareness on water savings that SES could build on? What happened to the Love Water campaign launched in 2019?	Drought trigger levels: have you given consideration to chalk stream flow/level as a form of drought trigger? It would seem odd for chalk streams such as the Wandle or Hoggs Mill to be drying up without triggering drought actions. I understand you have a number of OBHs in the chalk, but do these give an accurate representation of chalk stream levels/flows? In table 2.0, drought level 0 - how is environmental stress defined? I feels right that if the environment is stressed, this should be sufficient to trigger a targeted media campaign with customers. 1-in-500 year event: I understand that you will need to plan for this as part of PR24 and WRSE regional planning. Will this require significant supply-side development (such as bulk transfers), alongside more significant demand reduction approaches under normal times? Page 40 states that controls/mitigation measures will be put in place when a drought permit for the River Eden is sought. What would these mitigation measures be? Detailed ecological mitigation plans for rivers under drought permits should be in place. Is it correct that NEUBs will be introduced before the application of a summer drought permit on the Eden? That seems to be the case on p41, but it seemed less clear from the drought action sequencing (p51 and 52). I'm interested in what work you've done into options for water trading and sharing between different uses (including non mains users with their own abstraction licences) - both under normal conditions and at times of drought. Perhaps not so relevant for the drought plan, but have you considered how best to operate levels in Bough Beech to maximise biodiversity in and around the reservoir?						
Yes	Yes	No	No	Yes	Yes	Yes	Very early, clearly and honestly. TUBs should be half expected by the time they are introduced. There is always a huge backlash when TUBs are announced, which no doubt puts companies off announcing them until they are absolutely necessary, but that then contributes to the backlash as the measures come as a surprise. I think there is an (understandable) tendency in the industry to convey the impression that everything is ok if at all possible. This will have to change if customers are to take a more proactive role in water efficiency generally as well as drought response. I appreciate this is challenging, but really there should be greater public understanding of drought and the measures used to manage them, with a view to reducing hostility to TUBs etc when they are needed. The backlash is, in my view, out of proportion with the inconvenience hosepipe bans actually cause (very little for most people), so the public response is I think more about the indignation over the principle than the practical inconvenience. Now nature and the environment has risen up the public agenda, there is an opportunity to emphasise the link between unrestricted water use and wildlife / river / environmental impacts. This could be couched positively rather than negatively - e.g. by not washing your car with a hosepipe, you are doing your bit to protect x species. Leakage should also be addressed head on rather than avoided, or that will be the inevitable pushback.	N/A

Areas which received the least support, of under 80%, although still a significant majority, included understanding which activities are banned under TUBs and NEUBs, willingness to limit water use to 50 litres per day and the acceptability of rationing. In the case of the first of these, the long list of exemptions to the restrictions, whilst necessary to protect businesses and disadvantaged customers, is likely to contribute to the lower level of understanding.

It is also understandable that around one quarter were not supportive of the significant reductions on usage. This is a novel approach and the industry, along with government and other organisations, need to communicate clearly how it helps us to manage drought and the benefit of sharing responsibility across society to prevent a loss of supply as well as protecting the environment. With current consumption rates around 150 to 160 litres per person per day, reducing usage by two-thirds would need high acceptance and significant behaviour change. As some of the comments indicate, other issues such as leakage would need to be tackled with succinct messages to improve understanding and support for consumer restrictions. One comment relates the ability of the public to largely cope with Covid-19 restrictions to the ability to accept water use restrictions.

Support for more severe demand measures is perhaps surprisingly at the same level as the 50 litres/person/day, even though these would have much more of an impact on daily life. This is likely to be due to the clear need to take these measures in an extreme drought because there are no other options available other than limited additional supplies such as from tankers.

With regard to comments to question 8, on methods of communication, there was a wide variety of suggestions from email to Facebook to radio and TV, with requests to use newsletters to specific groups. More than one respondent referenced the need to not rely solely on social media or electronic means of communication, so as to not exclude any one group of consumers. In response to the comment on savings from water efficiency messaging, we agree that much more research is needed, preferably at a national level and led by government. Had the Love Water campaign included this, which was not the case, then it would be possible to build on some existing knowledge. It is a risk to rely on such demand savings unless the data fully supports this. We also agree with the last comment that we should communicate effectively with customers during the early stages of drought - using positive messages - so they take a more proactive role by improving understanding of water resources and the benefits of pre-exemptive action. In the spring of 2018 we started moving towards this approach, explaining in press releases that we needed customers to use water with care in order to reduce the risk of restrictions being needed.

The other comments received were wide-ranging, covering topics such as the additional water demand of housing developments, leakage, vulnerable customers, drought triggers with regard to chalk streams, the shift to 1-in-500 year drought resilience and the sequencing of drought measures. Some of the comments relate more to our other plans, including our Water Resources Management Plan (WRMP) and Business Plan. Our WRMP covers the forecasting of demand, including from housing growth, and balances this against available supplies. The guidance on WRMPs from government includes a requirement to take housing growth from Local Authority plans into account. Similarly the move to 1-in-500 year drought events, and the impact this will have on water resource deployable output, along with options including water trading, are part of the next Regional Resilience Plan (to be published for consultation in early 2022) and therefore our next WRMP in 2024.

On drought triggers, we have acknowledged in the plan that there will be circumstances where there will be environmental stress – including in our precious chalk streams – without there being a material risk to water supplies. This is why we have introduced a Level 0, to signify a threshold at which we would work with the Environment Agency and organisations such as the South East Rivers Trust, both of whom we already work with closely, to increase communications to customers and organisations and identify any other relevant measures that could be taken.

We have set out the likely sequencing of drought measures in each drought trigger level as clearly as possible, but it is difficult to be definitive given the variation in factors such as time of year. However, we have stated in 3.3.3, a Drought Permit for abstracting from the River Eden in summer would only be sought after publishing a notice to bring in NEUBs. We will seek to clarify the text to ensure the wording is consistent on this point. On mitigation measures, these are set out in the Environmental Assessment Reports.

Section 4: Retailers

In line with our commitment to work collaboratively with other water companies across the region, the Water Resource South East (WRSE) group as well as Anglian Water held a webinar aimed at engaging with retailers about drought during our draft drought plan public consultations. The webinar was held on 2nd July via Microsoft Teams, and representatives from each of the water retailers operating across the South East region were invited to attend.

During the webinar the WRSE group representatives presented information about water company drought plans in general, as well as how we manage drought planning in the South East. We explained the purpose of drought plans, and the triggers and actions which they set out to enable water companies to proactively manage the risks associated with drought. There was a focus on elements which would be particularly of interest to retailers, including demand management, communications, timing and temporary use restrictions. We also explained how we as a group are working together to align our drought management processes where possible, which ensures less confusion for our customers and helps to improve the effectiveness of drought communications.

The webinar was attended by four retailers, including ADSM and Wave Utilities, and shared with others unable to attend afterwards. Key points raised during the meeting were:

- A question about how Covid lockdowns have impacted water use and demand
- Retailers could help to support when water companies are asking for voluntary reductions in demand
- May be useful to identify high water users before a drought occurs, to enable conversations with them about greater water efficiency with their non-essential water use during a drought
- It is useful for water companies to provide regular and proactive resource updates
- Need to ensure that communications to retailers include a clear call for action

The WRSE companies would like to continue to work with the retailers to ensure that drought communications are agreed between the water companies and retailers for future droughts.

Section 5: Next Steps

Following the publication of this Statement of Response, we will continue to review and update the Drought Plan as indicated. We will also respond to feedback received after publication on whether our response sufficiently addresses the comments and concerns raised.

In light of our new commitment to carry out a Strategic Environmental Assessment of the groundwater permits, alongside the other comments which require a substantial change to the plan, we do not expect to be able to submit a revised draft Drought Plan until late Spring 2022. This is later than the expected date of December 2021. We do not expect this to cause any significant operational issues since the current plan was published in May 2019 and is largely up-to-date.

Appendix A: Consultation Document



At a glance

Droughts are a period of water shortage caused by low rainfall. They can cause harm to the environment and reduce how much water we have to supply our customers.

This plan sets out how we will carry on supplying water during a drought.

We continually monitor our sources, so we know when a drought is starting.

We use drought triggers to tell us what activity we should carry out and when.

This includes taking action to maximise the amount of water from our sources and move it around our area.

We will ask customers to use less water and restrict water use for certain activities as the drought becomes more serious.

If needed, we will ask for permission to temporarily take more water from the environment to supplement our supplies.

In an emergency situation we may need to tanker water from elsewhere and ration water supplies.

We want to hear your views on our drought plan. Have your say at seswater.co.uk/publications

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Introduction

This plan sets out how we will carry on supplying water during a drought. It explains the steps we will take to keep taps flowing and what you can do to play your part.

There are different types of drought, but all result in a period of water shortage caused by a prolonged period of low rainfall.

The nature, timings and impact of droughts can vary. Some will only affect a small area while others will be more widespread. They can impact on sectors – such as agriculture, water companies, the leisure industry and the environment – quite differently.

The more serious they become, the more of an impact they will have on society, the economy and the environment. That is why we are required by law to have a plan to manage them.

We can't prevent a prolonged period of low rainfall from happening but we can, with your help, manage the situation and reduce the impact on people and the environment.

This is particularly important as we are in an area of serious water stress so we all need to do everything we can to help protect our water supplies, whatever the weather.

We would like to hear your views before our plan is finalised and published because the measures within it will impact on people, communities, and businesses; as well as the local environment.

We ask a number of questions at the end of this document so please share your feedback.

No two droughts are ever the same and climate change is likely to make them more severe and frequent. That's why we have tested this plan against lots of different drought scenarios including those we've experienced in the past and those that might occur in the future.



When will we use our drought plan?

We continually monitor rainfall levels and river flows, as well as the amount of water that is in the water sources we use to supply our customers.

Each of these sources have a series of trigger levels which tell us when a drought is developing and getting worse. These correspond to the following stages:

- Normal (no drought)
- Impending drought (level 1)
- Drought (level 2)
- Severe drought (level 3a and 3b)
- Emergency drought (level 4)

As the drought progresses we will take different actions at each stage to mitigate its impact and preserve water supplies.

Where our water comes from

We supply high quality drinking water to more than **735,000** people in parts of Surrey, West Sussex, Kent and south London



What we will do during a drought

The actions we will take to manage a drought can be split into two areas - maximising water supplies and reducing demand.

Maximising water supplies

These actions will help us to make more water available to supply to customers. They include:

Changing how we operate our sources - we will change how we use our water sources so we rely more heavily on those that can be recharged by pumping water from other parts of the aquifer and preserving supplies in those that are reliant on rainfall to refill them.

Moving water around our region - we have constructed new pipelines which means we can move water around our region more easily. In particular, we can transfer more water from Bough Beech reservoir in the south of our operating area to the north, helping to preserve supplies in local sources.

Drought permits - we can apply to the Environment Agency for permission to abstract water from the River Eden outside our normal abstraction period to help us refill Bough Beech reservoir.

One drought permit would allow us to continue our winter abstraction throughout May and the other would allow us to abstract from June to August, if river flows permit. Together, they would provide up to 272 million litres per day of extra water.

We can also apply for permission to abstract additional water under certain conditions from three groundwater sources - Hackbridge, Kenley and Woodmanstene. Together, these could provide an additional 9 million litres per day. We would not apply for a drought permit until after Temporary Use Bans have been introduced. If we do, we will enhance our environmental monitoring and take measures to mitigate the impact on the environment.

Reducing demand

These actions will help us save water so the supplies that we have can go further. They include:

Customer awareness campaigns - we will use a range of channels including social media, newspapers, TV and radio, advertising and events to reach our customers and ask them to use water more carefully. We will join up where we can with the other water companies and water retailers, to work together to reach customers, businesses and other water users.

Leakage management - we will step-up our activity to find and fix leaks both on our network and customers' pipes, and manage the pressure inside our pipes so less water is lost.

Temporary Use Bans (TUBs) - will restrict some outdoor water use by household customers to help save water.

Non-Essential Use Ban (NEUB) - will restrict some water use by non-household customers to help save water.

Limit household consumption - we will make public appeals to customers to limit their daily consumption to help preserve supplies and avoid rationing water.

Pressure reductions - we will reduce pressure in a phased way.

Emergency drought order - would allow us to bring in emergency measures such as only supplying water at certain times of the day ('rota cuts') or putting standpipes in public places for people to draw water from instead of it being supplied to their homes.



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Water use restrictions

During a drought we may need customers to restrict their water use. Here we explain what would be restricted at each stage.

There are exemptions for certain customers and activities. Some of these will be applied automatically by all water companies. Others will be introduced at the discretion of individual companies.

A = Automatic exemption

D = Discretionary exemption

Temporary Use Ban (TUBs)

What's not allowed?

You can't use a hosepipe or a sprinkler for:

- Watering a garden - which includes private and public gardens, parks, allotments, grass verges and open green spaces
- Cleaning a private motor vehicle
- Watering plants at domestic premises
- Cleaning a private leisure boat
- Any domestic recreational use

- Cleaning the walls or windows of domestic premises
- Cleaning paths or patios.

Or use water to:

- Fill or maintain a domestic pond or ornamental fountain
- Fill a domestic swimming pool or paddling pool.



What's exempt?

- Watering the areas of grass with a hosepipe or sprinkler that are used for sport or recreation (not the whole ground), to protect health and safety (A)
- Approved drip or trickle irrigations systems that have a pressure reducing valve and timer (A)
- Blue badge holders (A)
- Companies that use hosepipes for their cleaning business such as window, car and patio cleaners (A)
- Using a hosepipe to clean a private boat which is the customers' home; where not cleaning it will increase fuel consumption and where it is the required method of cleaning the engine (A)
- Filling a domestic pond during construction and which contains fish or other species (A)
- Filling a pool used for medical treatment, veterinary treatment and animal decontamination (A)
- Filling an ornamental fountain that provides air to a pond containing fish (A)
- Watering newly laid turf with a hosepipe or sprinkler for the first 28 days (D)
- Customers with mobility issues on the company's vulnerable customers list (D)
- To prevent the spread of invasive species (D)
- To operate water features with religious significance (D).

We will introduce TUBs in a phased way. In phase one only the use of sprinklers and unattended hosepipes will be banned for watering a garden. In phase two this will extend to the use of a handheld hose for all the activities outlined above.

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Non-Essential Use Ban (NEUB)

To introduce a NEUB we are required to apply for a Drought Order to the Secretary of State.

What's not allowed?

- Watering outdoor plants on commercial premises
- Using a hosepipe for filling or maintaining a commercial swimming pool or paddling pool
- Using a hosepipe for filling or maintaining a pond
- Operating a mechanical vehicle washer
- Cleaning any vehicle, boat, aircraft or railway rolling stock
- Cleaning any part of an exterior building or wall
- Cleaning the windows of non-domestic premises
- Cleaning industrial plant
- Using water to suppress dust
- Using an automatic cistern in an unoccupied building.



What's exempt?

- Water used to protect health and safety (A)
- Blue badge holders (A)
- Watering plants that are for sale; or are part of the National Flower collection or on temporary display (A)
- Filling or maintaining pools that are open to the public, used by schools for swimming lessons, used for medical or veterinary treatment and animal decontamination (A)
- Filling pools or ponds which contain fish or other aquatic species (A)
- Using an approved drip or trickle irrigation system during the evening or night (D)
- Watering newly bought plants for the first 28 days (D)
- Businesses whose sole occupation is cleaning windows using a hosepipe (D)
- Businesses that use water to remove graffiti (D)
- Using water on biosecurity grounds (D).

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Our drought plan

Below we set out the actions we will take at each stage as the drought develops.

Drought stage	Maximise supplies	Reduce demand
Impending drought (level 1)	Start to use sources conjunctively so groundwater can be preserved and surface water used where possible Transfer more water to the north of our area Begin environmental monitoring Postpone or cancel planned work at our sites that would make less water available	Begin customer awareness campaign Promote water efficiency advice, products and virtual home audits Engage with essential service providers Increase work to find and fix leaks Use less water to run our own operations Co-ordinate communications with other water companies and regulators
Drought (level 2)	Bring peak sources into supply or increase their output Use transfers to move water around the area to where it's needed most Continue to use Bough Beech reservoir and transfer water to the north if river flows are sufficient Begin drought permit preparations and start environmental mitigation measures	Implement TUBs phase 1 and 2 Communicate introduction of TUBs to customers using a range of channels Repair leaks more quickly and find and fix more customer-side leaks and offer free repairs Work with retailers, key local stakeholders and large water users to prepare for more severe drought Engage with and support vulnerable customers Increase communications activity in collaboration with other water companies and regulators

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Drought stage	Maximise supplies	Reduce demand
<p>Severe drought (level 3a)</p> <p>Apply for a drought permit to abstract water from the River Eden during May to refill Bough Beech reservoir</p> <p>Apply for one or more of the groundwater drought permits (timing and order will depend on the drought situation and time of year)</p> <p>Apply for a drought permit to abstract water from the River Eden during the summer to refill Bough Beech. We would not make this application until a NEUB has been introduced.</p> <p>Carry out enhanced environmental monitoring and mitigation measures</p>	<p>Further increase public awareness and appeal for restraint</p> <p>Ask retailers, large business users, local authorities, fire authorities, hospitals and schools to reduce demand</p> <p>Apply for a drought order to implement NEUB</p> <p>Communicate non-essential water use restrictions to affected businesses</p> <p>Support vulnerable customers</p> <p>Further increase activity to find and fix leaks</p> <p>Implement pressure reduction in areas where we can</p>	<p>Remove all exemptions on TUBs and NEUBs</p> <p>Implement further pressure reduction where possible</p> <p>Consider limiting consumption to 50 litres per person per day</p> <p>Increase support to vulnerable customers</p>
<p>Severe drought (level 3b) – we've included additional activity, so we are doing 'more before 4' to help avoid emergency drought measures</p>	<p>Tanker additional supplies of water</p>	<p>Co-ordinated communication with Government and relevant agencies about extreme restrictions</p> <p>Introduce phased pressure reduction</p> <p>Introduce standpipes and/or rota-cuts as appropriate</p> <p>Work with emergency planning bodies to ensure security of supplies</p>
<p>Emergency drought (level 4)</p>	<p>Increase use of tankers to provide extra supplies</p>	

You can read our full drought plan document at www.seswater.co.uk/publications

Levels of service

We aim to provide our customers with an excellent service, but these measures will be needed if a drought occurs. We plan to introduce:

- ➔ Temporary Use Bans (TUBs) – **once every 10-years** on average
- ➔ Non-Essential Use Bans (NEUB) – **once every 20-years** on average
- ➔ River Eden drought permit (May extension) – **once every 20-years** on average
- ➔ Groundwater drought permits – **once in every 20-years** on average
- ➔ River Eden drought permit (summer refill) – **less than once in every 20 years**
- ➔ Emergency drought measures – **once in every 200-years*** on average.

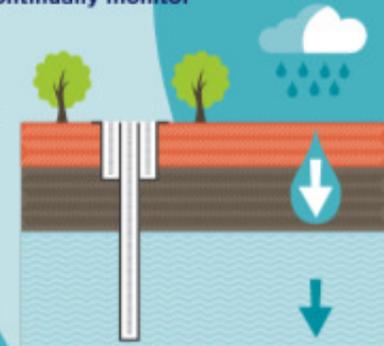
*This aligns with our current Water Resources Management Plan (WRMP) which plans for emergency drought situations once every 200-years. Our next WRMP will plan for this to happen once every 500-years reducing the chance that emergency measures will be needed.

The last Temporary Use Ban was used during the 2012 drought. We typically see demand reduce by around 5% when TUBs are introduced.

After a drought

A drought affecting the public water supply will only end when there has been enough rainfall to refill our water sources. That can take months. We will continually monitor the situation and remove the different levels of restrictions as soon as we can, once our water supplies reach a healthy level.

We will always carry out a full review following a drought which will include considering how well restrictions worked, the impact on the environment and how it affected our customers. We will share our findings with our industry colleagues and use them to inform our next drought plan.



Taking action today

We've prepared our drought plan, so we are ready in case a drought develops and becomes more serious. This is our emergency plan to make sure water supplies are maintained and the environment is protected.

But we aren't waiting until things get really bad to take action. We are working hard today to make sure our water resources are reliable and resilient, so we reduce the chance of having to take these emergency measures. There are also things you can do now to help protect our precious resource and the environment it comes from.

We are...	You can...
<ul style="list-style-type: none"> • Providing free water meters to all our customers to help them save water • Introducing smart meters to provide customers with more regular updates on their water use and help them use less • Reducing leakage on our network by using new technology that helps us find leaks more quickly and identify the water mains most likely to leak and replace them • Offering free repairs to customers who have a leak outside or inside their home • Working with our neighbouring water companies to identify where we need new sources of water and pipelines to move it around the region more easily • Carrying out work that will help improve the quality and quantity of the water in our rivers and underground sources and make them more resilient to drought events. 	<ul style="list-style-type: none"> • Find out how much water you use and how you can make savings by carrying out a 20-minute virtual water audit of your home at www.seswater.co.uk/getwaterfit • Install the recommended water saving devices in your home to help you use a little less everyday • Encourage everyone in your home and at work to avoid wasting water where they can by turning off taps, taking shorter showers and waiting until the dishwasher is full before running a load • Fix dripping taps and leaky loos and if you're worried you have a leak contact us quickly and we can help you fix it • Have a meter installed at your home so you only pay for what you use • Choose a water efficient model next time you change your washing machine or dishwasher • Buy water efficient fixtures and fittings next time you refurbish your bathroom or kitchen • Install a water butt or two in the garden so you capture rainwater to water your plants.

Remember, every drop counts. **If we all save a little, together we can save a lot.**

Tell us what you think

We would like to know what you think of our plans to manage droughts. Below are some questions which will help us to understand your views.

1. Do you understand the different phases of drought and the action we will take at each?
2. Do you understand what activity is not allowed under a Temporary Use Ban and a Non-Essential Use Ban?
3. Do you agree with the automatic exemptions from restrictions on using water?
4. Do you agree with the discretionary exemptions from restrictions on using water?
5. Do you agree that we should not apply for a drought permit until Temporary Use Bans are in place – so we are taking measures to reduce demand before we take more from the environment?
6. Would you be willing to limit your water use to 50 litres per day to help avoid water rationing being introduced?
7. Do you think it is ever acceptable to introduce water rationing such as standpipes or rota outs?
8. How best can we communicate with customers during a drought?
9. Do you have any other comments about our drought plan?



You can answer these questions using our online form www.seswater.co.uk/publications

Alternatively, you can email your response to water.resources@defra.gov.uk or write to:

Secretary of State (DEFRA)
 Drought Plan Consultation (SES Water)
 Department of Environment, Food and Rural Affairs
 Area 30
 Nobel House
 17 Smith Square
 London
 SW1P 3JR

The closing date for responses is 30 July 2021.

Thank you very much for participating in our drought plan consultation. We will publish our Statement of Response and update to our plan later in 2021.

Find out more
Visit our website seswater.co.uk
Follow us on Twitter [@SESWater](https://twitter.com/SESWater)
Join our Talk on Water
online customer community
seswater.co.uk/talkonwater



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