





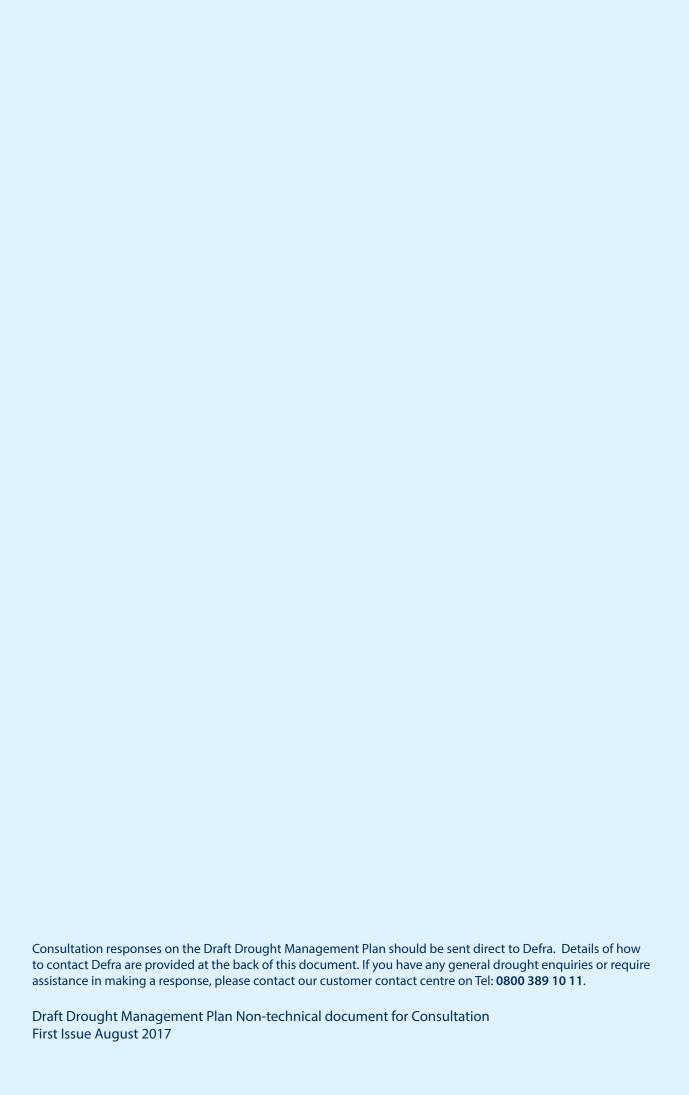


Draft Drought Management Plan

Non-technical summary for Consultation



First issue August 2017



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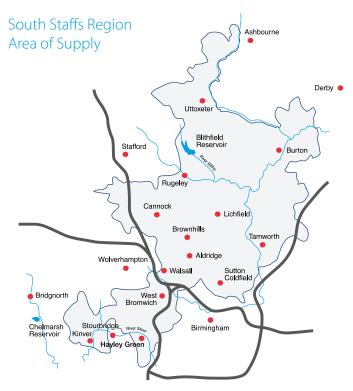
Introduction

Welcome to the non-technical summary of the Drought Management Plan for South Staffs Water. We have developed this document from the full Drought Management Plan to give you an insight into our plans to manage water supplies in the event of prolonged dry weather and a lack of rainfall. It sets out the short and medium term operational steps that we will undertake before, during and after a drought event to ensure that we can provide you with a secure water supply, with minimal impact on the environment. It shows you the triggers that are used to determine our actions, how they will impact on you and identifies how we will keep you informed of the measures we will put in place.

The first statutory drought plan for the South Staffs region was published in September 2007, in accordance with the legislation and Environment Agency's (EA's) supplementary guidance current at the time. The plan was revised in 2013 following the introduction of the Flood and Water Management Act. In 2012 South Staffs Water merged with Cambridge Water. However, as the South Staffs region has a distinctly separate geographical and water resource area, it continues to publish its own Drought Plan. If you would like to view the full Drought Management Plan, details can be found at the end of this document.

South Staffs Water supplies drinking water to a population of 1,322,000 in the West Midlands and the Black Country, an area that extends to Uttoxeter in the north, Kinver in the southwest and Tamworth and Burton-upon-Trent in the east. Our water comes from an integrated water supply network of two surface water works and 26 groundwater sources, which are linked by our mains network.

Despite the drought conditions experienced in 1995 and 2011, we have not had a temporary usage ban (hosepipe ban) since the drought that affected the River Severn in 1976. The amount of water we are licensed to take is subject to agreement from the EA, but we anticipate that our current supply levels will meet any expected increase in demand over the period of this plan until at least 2025.



Who we consult with

We work with all the key regulatory bodies to ensure that our plans are in line with best industry practice and take advice where necessary. This document has been developed to help you understand what we propose to do should we enter a drought period. We welcome any comments that you have. Details of how to respond are listed at the end of the document.









What is drought?

There are many different definitions of drought. For the purpose of this document, a drought is a prolonged period of abnormally-low rainfall, leading to lower than expected reservoir levels. When this occurs, we need to consider how to manage our supplies and meet the demand for water. Generally groundwater levels in the South Staffs region are resilient, even to long periods of low rainfall, and are not the best indicator of drought conditions.

Our experiences of historic drought activity since the early 1900s enables us to categorise droughts as short, medium or long-term duration, as these descriptions help us identify the triggers and what measures we would need to have in place.

Short duration

A short duration or single season drought generally lasts six to nine months and tends to include a hot dry summer with less than 70% of the average rainfall. This means that our surface water sources are drawn down significantly before the start of the winter period.

Medium duration

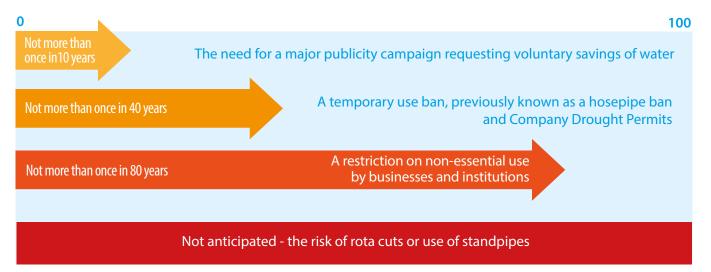
A medium duration drought comprises two successive dry winters, with an intervening dry summer. In this scenario, we may need to consider applying for Company Drought Permits.

Long-term duration

A long-term duration drought would be signified by two consecutive dry winters and two intervening dry summers. This would be a critical drought scenario for South Staffs Water and would involve the introduction of restrictions to water use and the implementation of Company Drought Permits. In these circumstances, we would require everyone to work closely together to help manage the situation.

Our levels of service and what this means for you

Our understanding and analysis of historic droughts and how these have been managed with our water supply system is the basis of our Levels of Service. This demonstrates how frequently we might expect to implement different stages of the drought plan.



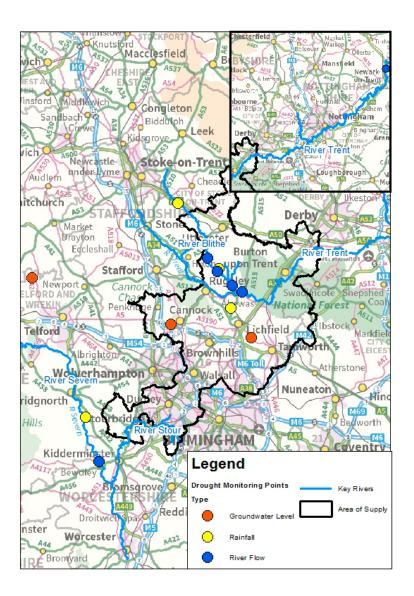
Monitoring for drought

We carry out a whole range of monitoring. We collect a range of hydrological data to monitor climatic and water resource conditions. We use data from the Met Office to tell us the impact of summers and hot spells on how much rainfall is affected by evaporation and how this might affect recharge of our aquifers, reservoirs and rivers.

Our groundwater sources are not significantly affected by drought, although the River Severn is susceptible to a single drought season, as the river flows can fall quickly. However, the River Severn is regulated by the Environment Agency and can be supported by additional flows from other sources (Clywedog Reservoir, Lake Vyrnwy and the Shropshire Groundwater Scheme are part of this flow regulation system which is operated by the Environment Agency).

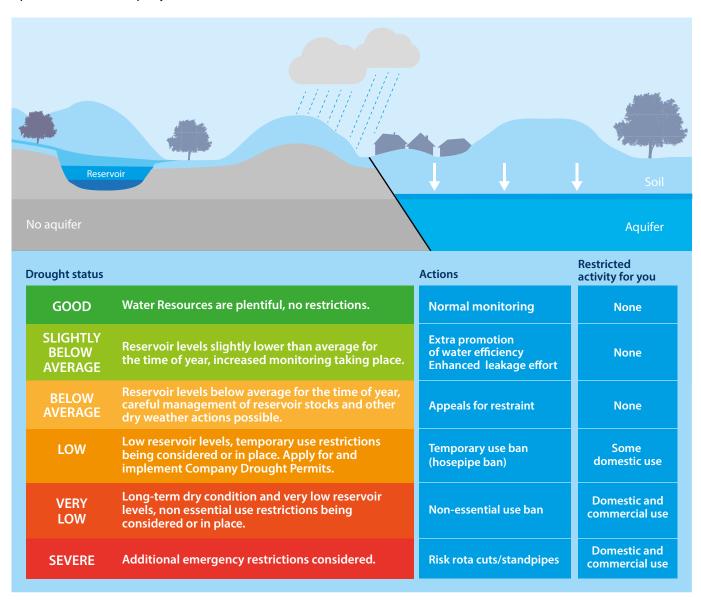
Blithfield Reservoir is considered to be a two-season critical source, as its lowest storage level would occur in the second year of a drought period, if the reservoir had failed to refill over the winter. We can support the levels in Blithfield by putting additional water back in from lower down the River Blithe. The ability to use this support is linked to flows in the River Trent.

Reservoir levels are the principal indicator of the severity of drought conditions and help guide what actions we carry out to ensure supplies can be maintained. In addition, we look closely at rainfall and river flow patterns to tell us how likely and how quickly a drought is to develop.



Our drought triggers

We have adopted a colour-coded system, based on a traffic light-style, to identify the severity of a drought and help make it easy to understand the implications. The following diagram identifies the conditions – normal through to unprecedented drought, along with the actions and levels of service to be expected. This is updated on the company website with current conditions.



Our drought management plan explores how we would manage resources and demands through a number of variable but plausible drought scenarios, by implementing a range of viable management options. However, it is not prescriptive as our operational managers need to be able to make informed decisions and develop an action plan based on the specific situation in which they find themselves.

Actions we take during a drought

When we find ourselves in a drought situation, we work hard to balance your needs with the needs of the environment. We do this using a variety of supply and demand management actions. We aim to avoid restrictions on water use wherever possible, however these are sometimes necessary to manage demands. The most severe restrictions would only be introduced in unprecedented drought conditions, and following agreement with Defra.

Managing our water supplies

Based on our current abstraction licence capability, we are fortunate to have headroom within our water supplies. There is always the potential that this situation might change, due to licence agreements being reviewed or an impact on supplies from climate change, so the situation will remain under continual review.

Courses of action available to us include:

- Ensure existing sources are fully operational
- Conserve Blithfield Reservoir
- Maximise use of enhanced treatment sites
- Operation of the River Blithe Pumpback
- Review the potential for bulk supplies between Severn Trent Water and South Staffs Water
- Transfer of potable water to Blithfield Reservoir
- Minor works at groundwater sites
- Drought Permits and Orders providing more water where it would be normally restricted. We do this by temporarily varying licence conditions. We carry out additional measures to protect other water users and the environment
- Operation of Blithfield Reservoir at Low Levels

However, these decisions will not impact on you, but are likely to be made at the same time as we are appealing to you to restrict your water use.

Managing the demand for water

In many instances, the impact of drought conditions can be mitigated against by engaging with the whole community, from customers to businesses and environmental regulators. Wise water usage and leakage reductions play a big part in protecting our community against tougher measures.

In an emerging dry period, one of the early demand management actions that we take is to enhance our efforts to reduce leakage beyond what is considered normally economical. This involves considerable additional work. We ask you to help, by reporting any leaks that you see promptly. We will also ask you to use water wisely. However, if a dry period continues to progress, then we will consider imposing restrictions to further manage demands.

A temporary use ban (previously known as a 'hosepipe ban') will only be introduced in circumstances which are in-line with the requirements of the Flood and Water Management Act (FWMA). The water industry complies with published best practice and four fundamental principles for good drought management:

- Ensure a consistent and transparent approach
- Ensure that the water restrictions are appropriate
- Communicate clearly with customers and the wider public/users
- Consider representations in a clear way

In the event that we need to consider temporary restrictions, we will make any decision to introduce restrictions in consultation with the EA and neighbouring water companies. We will ensure a consistent approach and messaging across the region.



What activities are covered by a temporary use ban?

Only the following uses of water may be prohibited:

- Watering a garden using a hosepipe
- Cleaning a private vehicle using a hosepipe
- Watering plants on domestic or other non-commercial premises using a hosepipe
- Cleaning a private leisure boat using a hosepipe
- Filling or maintaining a domestic swimming pool or paddling pool
- Drawing water, using a hosepipe, for domestic recreational use
- Filling or maintaining a domestic pond using a hosepipe
- Filling or maintaining an ornamental fountain
- Cleaning walls, or windows, of domestic premises using a hosepipe
- Cleaning paths or patios using a hosepipe
- Cleaning other artificial outdoor surfaces

We can restrict similar activities for businesses with a Non Essential Use Ban.

Timescales for our drought management actions

| | Threseares for our arought management actions | | | | | |
|--------|---|--|--|--|--|--|
| ΥE | Dry Summer and Autumn | | - Maintain a proactive approach to water efficiency | | | |
| YEAR 1 | Dry Winter | | Drought management team discuss possible scenarios Conserve water in Blithfield Reservoir by changing abstraction patterns and using the River Blithe Pumpback Increased liaison with the EA and Water UK | | | |
| YEAR 2 | Second dry Spring/ Summer | | - Initiate weekly external communication, launch public awareness campaign - Consult with Customer Council for Water (CCW) | | | |
| | Second dry Winter | | - Potable water transfer to Blithfield - Enhanced water efficiency campaign and coordinated action with regional stakeholders | | | |
| YEAR 3 | Third dry Spring/Summer | | Introduce temporary use ban and apply for Drought Permit. Introduce Drought Permit and consider more extreme measures (Non Essential Use Bans and emergency work) Daily external communications, regular appeals to customers, enhanced PR and media campaigns | | | |
| | Wet Winter | | - Consider relaxation of measures and maintain weekly external communication | | | |
| YR 4 | Average spring | | - Lift customer restrictions, notify customers and reinforce the need to continue to use water wisely. | | | |

Our timescales and process for introducing a temporary use ban

The impact of a temporary use ban can be far reaching so there is a clear timetable and process before this can be done:

| | | Week one – two | Week three – five | | |
|--------------------------|--------------------|---|--|--------------------|--|
| Communication | ider temporary use | Internal communication and governance. External communication with EA and neighbouring water companies. | Publication of notice, receipt and consideration of representations – including intention to introduce, terms of the ban, concessions, exemptions and phasing. | r use ban in place | |
| Method Trigger to consid | | Internally | Two local newspapers Our website (www.south-staffs-water.co.uk) | | |

Once the appropriate communication has taken place we can apply for the Drought Permit on day 37 and implement it on day 49 (at the end of week seven).

Immediately following the application for a temporary use ban, we can also start pre-consultation for the imposition of an Ordinary Drought Order (ODO), which is better known as a non essential use ban. On day one we will advertise the ODO giving seven days' notice. Following the seven days, we will submit an application to Defra. Defra has 28 days to determine the application – so on day 35 the ODO can be implemented.

As these notices are a formal and legal requirement, they must be published in full in appropriate media, in a certain format and containing particular information. However, we will also use other channels of communication to make you – our customers – aware of the proposed restrictions in a format that is clear and easy to understand. Once agreed, they will need to be implemented quickly. However, developing drought conditions and the possible need for restrictions would have been communicated well in advance so when the process starts it should not come as a surprise to you.

Concessions and exemptions to temporary use restrictions that may apply to you

A temporary use ban will impact different people in different ways and where necessary we do have the power to make concessions and exemptions. Blue badge holders have Discretionary Universal Exemptions to the restrictions, and the use of a hosepipe to fill or maintain a pond containing fish will be included as a Statutory Exception.

The following activities within a restriction are also already exempt:

| Restriction | Exemption |
|---|---|
| Watering a garden using a hosepipe | Agricultural land, commercial use for the growing of crops, fruit, vegetables and other plants Temporary flower displays Land used for National Plant Collections |
| Cleaning a private vehicle using a hosepipe | Public service vehicles and goods vehicles defined by legislation |
| Watering plants on domestic or other non-commercial premises using a hosepipe | Plants in outdoor pots and in the ground, under cover in public authority or commercial premises Plants grown or kept for sale or commercial use Plants as part of a National Collection or flower display |
| Cleaning a private leisure boat using a hosepipe | Vessels used in course of a business Vessels made accessible for use by the public Cleaning any area of a private boat enclosed by a roof and walls, other than doors and windows |
| Filling or maintaining a domestic swimming pool or paddling pool | Where necessary during construction Using a hand-held container filled directly from a tap Where it is designed, constructed or adapted for use in medical treatment Where it is used for decontaminating animals for infection or disease, or in the course of veterinary treatment In which fish or aquatic animals are being reared or kept in captivity |
| Drawing water, using a hosepipe, for domestic recreational use | No exemptions |
| Filling or maintaining a domestic pond using a hosepipe | Where fish or other aquatic animals are being reared or kept in captivity |
| Filling or maintaining an ornamental fountain | On or near a fish pond, which is designed to supply sufficient oxygen to the water to maintain fish health |
| Cleaning walls, or windows, of domestic premises using a hosepipe | Cleaning activities for Health and Safety reasons and likely to be removing risk to human or animal health and safety or the prevention or control of disease |
| Cleaning paths or patios using a hosepipe | Cleaning activities for Health and Safety reasons and likely to be removing risk to human or animal health and safety or the prevention or control of disease |
| Cleaning other artificial outdoor surfaces | Cleaning activities for Health and Safety reasons and likely to be removing risk to human or animal health and safety or the prevention or control of disease |

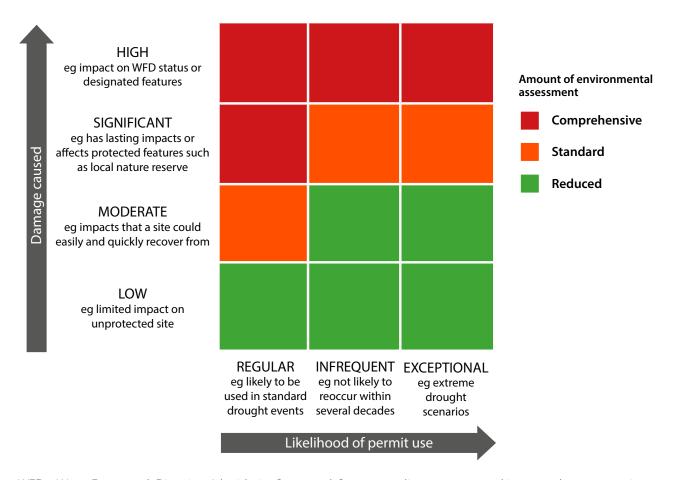
Other exemptions that we will consider include:

- Vulnerable customers for example, customers who may have extra needs such as those with a disability
 or have a medical condition can register with us for priority services as a vulnerable customer. If you
 or someone you know might be considered vulnerable to restricted use of water, you may apply to be
 considered exempt by registering for our confidential priority services www.south-staffs-water.co.uk/
 household/extra-help/priority-services-register
- Those demonstrating water reuse technologies for watering using a hosepipe
- Where it is felt to be in the best interest of the community

Our monitoring of environmental impact

Although our priority is maintaining a safe, clean supply of potable water to our customers, we also want to minimise any impact on the environment. We carry out environmental risk assessments, and these are taken into consideration when determining a course of action.

How we have assessed the risk level of drought management options



WFD – Water Framework Directive: A legislative framework for water policy to protect and improve the water environment.

It is a requirement of the Water Industry Act 1991 for water companies to monitor the effect of drought and of the measures taken under the drought plan. In addition, the EA Drought Plan Guidelines require an Environmental Monitoring Plan to monitor the impacts of drought actions and recovery following a drought.

How we monitor the environment in a drought

As a drought progresses, and prior to any formal drought measures being undertaken, normal communication with the EA and Natural England will be escalated. We will provide weekly and monthly updates on our water resource situation.

| Type of monitoring | What it involves |
|---|---|
| Meteorological and hydrometric monitoring | We undertake regular monitoring of rainfall against historic records, which provides an indication of cumulative rainfall throughout the year. We also collect weekly data on soil moisture deficit and effective rainfall over the catchment area from the Met Office. |
| | An automated groundwater monitoring system is maintained at all groundwater sources, linked it telemetry – information on abstraction rate and pumping water level is recorded. |
| | Telemetry provides daily operational data on Blithfield Reservoir and we carefully measure inflows from upstream tributaries. |
| | River flows are measured by the EA. We review this daily to manage abstractions from the River Blithe and the River Trent. |
| | We continuously measure reservoir levels at Chelmarsh Reservoir as part of the River Severn Works. |
| | The EA collates reservoir data for Clywedog Reservoir and Lake Vyrnwy and maintains flow gauging stations along the length of the River Severn as part of its operational management of the river. |
| | The EA maintains a number of groundwater observation boreholes across the supply area and in the Shropshire Groundwater Scheme catchments, which are used to support River Severn regulations. Long term groundwater trends are monitored on a monthly basis. |
| | As part of the National Environment Programme, we have installed a number of flow gauging stations and groundwater level piezometers in vulnerable catchments, with automated monitoring equipment. This data is regularly reviewed. |
| Ecology monitoring | Historical data on flow and ecology is available from the EA. We undertake additional monitoring at key sites. |

There is a second level of environmental monitoring if drought permits or orders are implemented. The level of monitoring is risk-based and not all sites will require monitoring. However, where there is deemed to be moderate or high risk, then baseline, during drought permit and post drought permit monitoring will be carried out.

Keeping you informed

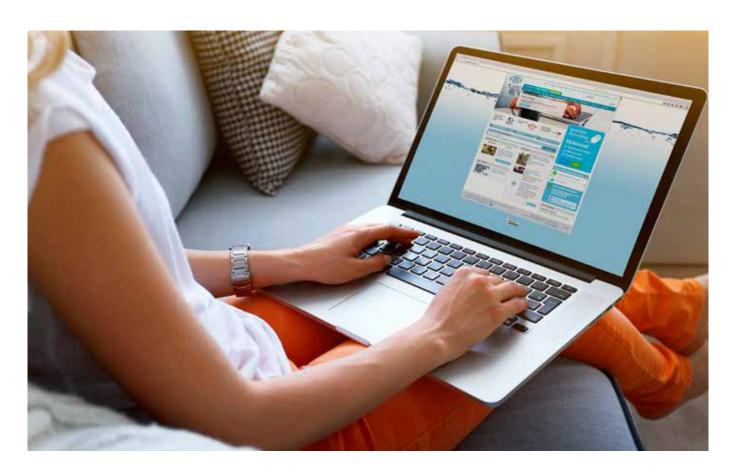
We understand how important it is to keep you informed at all times – before, during and after – a drought. We will use a variety of media channels from newspapers, TV and radio, through to social media and our own website to share timely, accurate information on the situation and the actions required.

The frequency of the communication will depend on urgency of the message, but our messages will aim to:

- Make you aware of the developing situation
- Make you aware of the measures we are planning to put in place and how they will impact on you
- Raise awareness of the need to reduce water demand, and use water wisely and efficiently

Depending on how widespread the drought is, there may be coordination of communication via the EA or Water UK. We will also work closely with other water companies to ensure a consistent message.

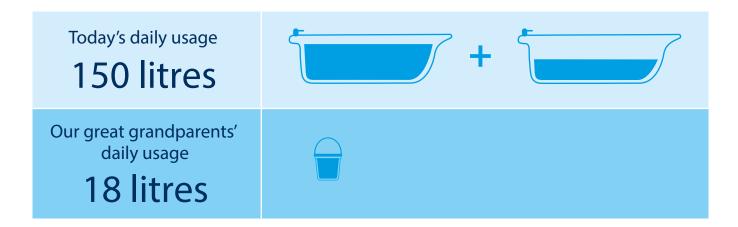
The drought situation and the effectiveness of the communication measures will be consistently monitored and the decisions to develop or modify future messages and actions will be made accordingly. In particular, the number of hits on the relevant pages of the website will be used to determine the effectiveness of the online campaign. Requests for water efficiency services, packs and information will also be monitored. Activity via social media platforms will also be used as an indication of engagement.



| | Audiences | | | | | | |
|--|--------------------------------|-----------------------|-------|-----------------------|----------------------|-----------------------|---------------|
| Communications channels | Key regulatory stakeholders | Other stakeholders | Staff | Domestic customers | Vulnerable customers | Business customers | School pupils |
| Meetings – face-to-face and one-to-one | • | • | • | | • | | |
| Customer website | | | | • | • | • | |
| Social media | • | • | • | • | • | • | • |
| Editorial via traditional media | • | • | • | • | • | • | • |
| Advertising via traditional media | • | • | • | • | • | • | • |
| SMS/text messages | | | • | • | • | • | |
| Email | | | • | • | • | • | |
| Call centre contact | | | | • | • | • | |
| Regular billing cycle mailings | | | | • | • | • | |
| Bespoke mailings | • | • | • | • | • | • | |
| Events | • | • | • | • | • | • | • |
| Stakeholder-owned channels | • | • | • | • | • | • | • |

What can you do to help?

Saving water benefits everyone. Every day, each one of us uses on average enough water to fill one and a half baths (approximately 150 litres). Many of us use a range of appliances that need large amounts of water from dishwashers to jet washers. Often, we don't realise how much water these take up. In comparison, our great grandparents managed with about 18 litres a day.



Look out for our water efficiency campaigns that we run throughout the year and visit our website to find out more ways you can be wise with water. In the meantime, here are some interesting facts and suggestions to think about:

With a little care and attention, it is easy to save water outside your property



The average hosepipe can use as much as 500 litres an hour – enough water to have six baths, or 10 showers! If possible avoid using sprinklers and hosepipes. If you do use a hosepipe, ensure it is fitted with a trigger nozzle that will stop the flow of water when you release it.



Water wisely – never water in the heat of the day – most will evaporate and if it's sunny you run the risk of scorching your plants. It's better to water in the evening or early morning.

Consider using an irrigation system that will deliver water directly to your plants.

Maintaining your garden will ensure water is not wasted on dead, diseased or damaged plants.



Washing the car – instead of using a hosepipe or pressure washer, use a bucket when shampooing your car and a watering can when rinsing off the soap.

Ensure pools and ponds are watertight as topping them up can use a lot of water. If possible try and keep pools covered to prevent evaporation.



Drinking water – this is one area where you should NOT cut back on your usage. UK tap water is one of the best in the world. Enjoy it.

Fridge it, putting a large bottle of tap water in the fridge will ensure you can have chilled water all the time. Waiting for the tap to run cold can waste more than 10 litres of tap water a day.

The end of a drought

We will work closely with the EA to determine when we can declare a drought is over. We appreciate the impact of temporary use bans and are committed to lifting any restrictions as soon as is reasonably practical.

We would expect the end of a drought to be when all the key indicators have returned to long term average levels, or that a sufficient number of indicators are showing a trend approaching long term levels, supported by meteorological outlooks with some certainty attached.

This is identified as when the risk of impacts from the drought are no greater than during a normal year, and where normal conditions have continued for a period of time. Once we have returned to a normal status we will review the actions taken and engage in a 'lessons learned' follow up. These are held internally and with industry regulators as appropriate.

The relevant indicators include:

- Storage levels in Blithfield Reservoir and Clywedog Reservoir
- Monthly inflows to Blithfield Reservoir
- Soil moisture deficit and the amount of effective rainfall, compared with long-term average (determined from the MORECS data provided by the Met Office)
- Cumulative rainfall and pseudo groundwater levels at rain gauges (determined from our own observations and records at the Central Works and the River Severn Works).

FAOs

Can I access the Technical Drought Management Plan?

If you would like more detail on the technical aspects of the plan and would like to review the Technical Drought Management Plan please contact drought.consultation@south-staffs-water.co.uk

I am worried about interruption to my supply on medical grounds, what should I do?

We will always ensure that our disabled or vulnerable customers are catered for. Please contact **drought. consultation@south-staffs-water.co.uk** for more information.

The news reporters are talking about a hosepipe ban, what would this mean?

If a temporary use ban is introduced you would still be able to water your garden using a watering can or bucket filled with stored rainwater from a water butt or reusing 'grey' water from a bath or wash basin.

Is South Staffs in a drought?

You can find out the current status for your area by visiting our website. We keep this up-to-date at all times.

How likely is South Staffs to enter a drought event?

We work hard to ensure that we have the supplies in place to meet the demands of prolonged dry periods.

What are drought triggers?

A drought trigger is the specific value of a drought indicator that activates a management response. For example, a drought trigger could be a reservoir decreasing below 50% of its storage capacity. In a drought contingency plan, trigger levels can be varied to alter the sensitivity of the response and the effectiveness of the plan.

What can I do to help during a drought?

During times of temporary use bans, you can do your part to reduce water use. Talk to family members about their water use and ways to reduce it too.

Will climate change lead to more droughts?

Although climate change is expected to lead to slightly more rainfall at the global level, the timing and distribution of that rain is likely to change, increasing the chance of drought in some regions. The details are very difficult to predict.

What is a temporary restriction?

A temporary restriction, formerly known as a hosepipe ban, is a requirement for customers not to use water for certain purposes. It restricts certain activities as defined by law, such as watering your garden or washing your car using a hosepipe.

How will I know if there is a temporary restriction?

We will consult with customers prior to restrictions starting. This will be publicised in local newspapers, as required by legislation, and through all available communication channels.

How will I know when a drought has ended?

We will keep you informed through all available communication channels. Droughts rarely have a sudden end, but we will lift any restrictions as soon as is practicable. This will indicate that conditions are improving and that drought conditions are receding.

What is a drought permit?

A drought permit is a special licence awarded by the Secretary of State that allows us to operate a water sources outside normal environmental restrictions, such as low river flows, during a period of exceptionally low rainfall. It usually requires us to carry out extra measures to protect the environment and other water users nearby.

What is a Non Essential Use Ban (NEUB)? Will my business be affected?

A non-essential use ban is a requirement for businesses and institutions not to use water for certain purposes. It restricts certain activities by law, such as using hosepipes to clean vehicles, boats and buildings, operation of car washes and the filling of ornamental ponds and fountains. Also the use of automatic cisterns at certain times. Please contact drought.consultation@south-staffs-water.co.uk for more information.

Representation submissions

Consultation responses on the Draft Drought Management Plan should be sent direct to Defra. Details of how to contact Defra are provided below. If you have any general drought enquiries or require assistance in making a response, please contact our customer contact centre on Tel: **0800 389 10 11**.

The Secretary of State for Environment, Food and Rural Affairs
Drought Plan Consultation
Water Availibility and Quality Programme
Department for Environment, Food and Rural Affaris
Area 2C
Ergon House
Horseferry Road
London
SW1P 2AL

water.resources@defra.gsi.gov.uk

We have also set up a specific email address for any Draft Drought Management Plan queries: drought.consultation@south-staffs-water.co.uk

Appendix

Sample leaflet





At South Staffs Water we are proud If we have to introduce a ban on You can still use watering cans and to be able to say that we haven't had hosepipe use, this is the list of things buckets, but we need your help to cut non-essential water use as much as a hosepipe ban since the drought you won't be able to use a hosepipe or possible. If you notice or suspect a leak, of 1976. But, if that situation arises let us know as soon as you can. Please also try to cut your use of water at home. again, we need to work to maintain · watering a garden or allotment a healthy supply of water to our customers while also protecting our - cleaning a private motor-vehicle or There are lots of things you can do, such leisure-boat water sources for the future. - filling or maintaining a domestic using washing up and vegetable We are given the power to impose a peeling water for your garden watering swimming or paddling pool hosepipe ban under the Water Use · only putting on the washer or drawing water for recreational use (Temporary Baris) Order 2010. This is so that we can make sure that our dishwasher for full loads · filling or maintaining an ornamental customers always have enough water for pond (not containing fish) or fountain · having a quick four minute shower the essential uses of drinking, cooking instead of taking baths cleaning walls, windows, paths, patios. and washing. driveways or other artificial outdoor · switching off the tap while cleaning your teeth surfaces · keeping a bottle of water in the fridge Exemptions to these are made for Blue for cold drinks, rather than running the badge holders and to fill or maintain a pond containing fish using a hosepipe. tap until it's cold getting dripping taps fixed. As soon as weather and demand conditions allow, we'll end the ban, but while it is in place, please think about what you can do to save water so we can preserve stocks for essential needs in your community.

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