



2027 Draft Drought Plan
Appendix L
Demand-side Measures

Appendix L Demand-side measures

L.1 Alignment in water use restrictions

Water companies, regulators and customers alike all agree that water use restrictions should be implemented in a clear and consistent manner across the South East of England. We have worked with the other WRSE water companies to align our phasing and exemptions as much as possible, however it should be noted that this does not mean that the measures would be triggered at the same time.

We have also based our policy on the statutory requirements and the guidance given in the UKWIR Code of Practice ('Code of Practice and Guidance on Water Use Restrictions', UKWIR). The Code of Practice (CoP) offers the following four principles to guide water companies when they are evaluating whether and how water restrictions will be implemented by them during times of drought:

- Ensuring a consistent and transparent approach
- Ensuring that water user restrictions are proportionate
- Communicating clearly with customers
- Considering representations in a fair way

In the task of setting out our implementation policy, the 2nd principle of proportionality is the most immediately relevant of the four. In putting the 2nd principle into practice, the key points to bear in mind are:

- The nature and seriousness of the water supply situation
- The water savings that will result from restricting the activity
- Whether it is appropriate to introduce the restriction in a phased manner
- Whether the restriction will result in a serious commercial impact
- The health or safety and biosecurity implications of the restriction
- Whether the restriction will impact on vulnerable customers or groups
- Whether it is appropriate to offer any concessions to any individual or group of customers

L.2 Temporary Use Bans

The legislation permits restrictions on eleven categories of use (also referred to as 'activities', 'measures' or 'purposes'), see Table L1 . It is up to the individual water company to decide which activities should be banned, how these restrictions should be phased in and which of these, if any, should be subject to exemptions or concessions. These are further discussed in the following appendices. Several of the activities have a statutory exemption on health or safety grounds.

Table L1 Temporary Use Ban Powers- Categories of Use

Description of measure	Additional comments
1. Watering a garden using a hosepipe*	Definition of 'garden' has now been greatly extended to include: a) a park; b) gardens open to the public; c) a lawn; d) a grass verge; e) an area of grass used for sport or recreation; f) an allotment garden g) any area of an allotment used for non-commercial purposes; h) any other green space. This is a new and much more wide-ranging definition than the original. This category Includes a statutory health or safety exemption.
2. Cleaning a private motor-vehicle using a hosepipe	Watering by hand using a bucket, using greywater or rainwater is acceptable.
3. Watering plants on domestic or other non-commercial premises using a hosepipe	A watering can could be used.
4. Cleaning a private leisure boat using a hosepipe*	Includes statutory health or safety exemption.
5. Filling or maintaining a domestic swimming or paddling pool	Customers may fill swimming and paddling pools by hand, using a bucket. Public pools are not covered by this restriction. Use of alternative water sources, including rainwater, is permitted.
6. Drawing water, using a hosepipe, for domestic recreational use	Customers may use a bucket to fill recreational equipment. Filling of recreational toys directly from a tap is not included.
7. Filling or maintaining a domestic pond using a hosepipe*	Ponds where fish or other aquatic animals are being reared are exempt.
8. Filling or maintaining an ornamental fountain*	This is an effective way of reinforcing the message of the seriousness of the drought
9. Cleaning walls, or windows, of domestic premises using a hosepipe*	Includes statutory health or safety exemption.
10. Cleaning paths or patios using a hosepipe*	This activity also applies to commercial premises. Includes statutory health or safety exemption.
11. Cleaning other artificial outdoor surfaces using a hosepipe*	This activity also applies to commercial premises. Includes statutory health or safety exemption.

In terms of giving public notice of impending Temporary Use Ban enforcement, section 76B of the WIA 1991 enhances the previous publicity requirements by requiring the water undertaker:

- To publish its notice on its website at the same time as it publishes the notices in two newspapers;
- To provide details in the notice of how to make representations about the proposed prohibition;
- To give notice each time the scope of any prohibitions imposed under section 76 of the WIA 1991 is varied; and

To give notice in relation to the lifting of any prohibitions on its website and in two newspapers.

L2.1 Drought Direction 2011

The Drought Direction 2011 (DD11) came into effect on 31 March 2011 and extended the categories of possible water use restriction when further savings are needed. DD11 sets out ten categories of use or activities that can be prohibited, see Table L1 as for the Temporary Ban legislation, several measures include exemptions on health or safety grounds. An Ordinary Drought Order application to the Secretary of State is still required before a non-essential use ban on commercial customers may be implemented.

The Drought Direction 2025 came into force on 23 July 2025 but DD11 remains in force.

Table L1- Drought Direction 2011- Categories of use

Description of non essential use measure	Additional comments
1. Watering outdoor plants on commercial premises	This activity mirrors the domestic equivalent (Activity 3).
2. Filling or maintaining a non-domestic swimming or paddling pool	Pools under construction are not included. This includes significant renovations and alterations that require substantial changes to the shape of a pool or major additions to the structure around the pool. It does not include minor works such as retiling or resurfacing.
3. Filling or maintaining a pond	Customers may fill using a bucket. Use of alternative water sources is permitted including rainwater. Ponds where fish or other aquatic animals are being reared are exempt.
4. Operating a mechanical vehicle-washer	
5. Cleaning any vehicle, boat, aircraft or railway rolling stock	Includes statutory health or safety exemption.
6. Cleaning non-domestic premises	Building cleaning may proceed by hand using water from a bucket. Greywater and rainwater may be used. Storage tanks - restrictions apply to water drawn from the mains supply after the statutory notice has been given, so water drawn into a container prior to that date may be used for cleaning the exterior of buildings. Includes statutory health or safety exemption.
7. Cleaning a window of a non-domestic building	An alternative (non-potable) water source could also be offered. Includes statutory health or safety exemption.
8. Cleaning industrial plant	Includes statutory health or safety exemption.
9. Suppressing dust	Includes statutory health or safety exemption.
10. Operating cisterns	Covers operating a cistern in any building that is unoccupied and closed.

L2.2 TUBs Implementation Policy – formal notice

Legislation sets out specific requirements for notifying the public prior to the introduction of TUB measures. We have selected a 1-3-week period for preparing and publishing TUB restrictions. Within the formal notice we will explain how representations about proposed prohibitions may be made and will ensure that representations are given appropriate consideration, particularly where stakeholders raise issues that have not been previously considered.

The public notice will be published on our website as well as in two national newspapers and a local newspaper. The notice will provide details of why the TUB is being introduced and describe the activities that are being banned and the exemptions being granted. An example of the public notice for the 2025 TUB is shown below in Figure L1.



A hosepipe ban will be in place from 22 July

From Tuesday 22 July, we're bringing in a hosepipe ban (also known as a Temporary Use Ban) in parts of the Thames Valley. Affected postcodes include **all of OX, all of GL and all of SN, plus RG4, RG8 and RG9** in our water supply area, as shown on the map below.

Why this is happening

This year, we had one of the warmest and driest springs in over a century. River and reservoir levels are lower than normal for this time of year, and we're now officially in the Environment Agency's prolonged dry weather category.

A hosepipe ban can help protect the environment in our region and keep water flowing for everyone.

At the moment, restrictions only apply to the area supplied by Farmoor Reservoir. This is because the reservoir fills from the River Thames, and levels could drop very quickly without more rain.

What this means for you

You can see the restrictions opposite, along with exceptions. Please don't use hosepipes for watering gardens, filling paddling/swimming pools and hot tubs, or cleaning vehicles, windows, and patios. The ban also applies to sprinklers and jet washers.

What we're doing

Leakage is at its lowest ever level since records began, but we're not stopping there. We're fixing 650 leaks every week, targeting the biggest leaks first. We're also rolling out smart devices across our region to help find leaks.

Limited mobility or on our priority services register?

If you have limited mobility or are on our priority services register under certain circumstances, the ban may not apply to you. Please check the exceptions 12 and 18 listed opposite. If you're not on the register, you can sign up at thameswater.co.uk/extracare



Every drop counts more than ever before.

Find out more at thameswater.co.uk/water-restrictions

Can't get online? Please call our drought helpline on 0800 072 1083

Figure L1 The notice sent to customers in 2025 when the TUB was implemented

Representations received will be considered by an internal panel and our response will be published on our website within the 3 week period. We have considered the potential that we might receive a large number of responses to our notice whenever we impose a TUB, and we will address this using learnings from 2022&2025 when we received a high volume of responses. To ensure we can deal with this, we would have dedicated members of staff in place to collate and sort responses according to the topic area and to then set out responses to the representations based on the direction of the internal panel. The internal panel would meet daily to consider the representations and determine our response. We would then prepare responses to the representations which would be posted on our website at the end of each day to mitigate further representations.

L2.3 Phasing and Exemptions

Our implementation policy on phasing and exemptions is based on the following factors:

- Defra/EA guidance.
- UKWIR Code of Practice (generally, and in particular adherence to the 2nd principle of proportionality) see section L2.
- Findings from customer research survey, see section L3.
- Clarity of message - consistent with our experience with past droughts, Defra and the EA, Ofwat and CCW have emphasised the need for clear and straightforward customer communication to facilitate an effective response to the new measures.
- The requirement for a consistent approach by water companies in the South-East of England, see section L4.
- Experience of implementing a TUB in 2012, 2022 and 2025.

L2.3.1 Phasing

The TUB legislation includes an option for phased implementation of the possible prohibitions.

We would not propose any phasing of the imposition of the eleven categories of use, as set out in the TUB if we faced a potentially severe drought situation, however we may adopt a flexible approach through implementing measures in one or more phases if the specific drought risk warranted it. However, dependent upon the prevailing Drought Event Level assigned, we may not prohibit all of the categories of use in a drought event.

As part of DEL2 a TUB is likely to be enforced (see Table L3). This level of water use restriction would be consistent with Level 2 of our Levels of Service. A single implementation phase would help to maximise water savings as well as send out a strong simple message that the drought situation is worsening.

The DEL is calculated based on the prevailing and potential water situation and generally this can be set at the end of the winter recharge season in March, when the final status of groundwater levels is known.

L2.3.2 Exemptions

We have worked alongside Ricardo and UKWIR during the drafting of the 2023 Code of Practice, and with Water Resources in the South-East water companies to align our exemptions for TUBs. The TUB restrictions exemptions are listed in Table L3.

Table L3 TUB exemptions

TUB Category	Statutory exception	Sub Category	Non-Statutory Common Exception (granted by all water companies)	Non-Statutory Bespoke Exception (granted by individual water companies)
1. Watering a garden using a hosepipe	Using a hosepipe to water a garden for health or safety reasons. NB In this category, the definition of “a garden” includes “an area of grass used for sport or recreation”. Therefore, it should be noted that watering areas of grass, which are used for sport or recreation, is covered by a Statutory Exception for health & safety only in relation to the active strip/playing area, not the entire ground.	Vulnerable customers	Customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
		Watering of new turf	Where this cannot be reasonably done by watering can, where the domestic turf was laid before the onset of TUBs, and for a period of four weeks which start from the date when the turf was laid, not the start of the TUB.	A drip or trickle irrigation watering system can be used if: - they are fitted with a pressure reducing valve and a timer - that are not handheld - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air.
		Watering of new trees, saplings, whips, hedging in domestic gardens	Where trees, whips, saplings and hedging have been planted within a three-year window of the imposition of the TUB (ie within the last three years of the start of a TUB)	
		Urban trees	Where standard trees (with a branchless stem of at least 1.8m high) are planted in urban settings , such as streets in the last three years	None
2 Cleaning a private motor-vehicle using a hosepipe	Vehicles defined as a “private motor-vehicle”, excluding: (1) a public service vehicle, as defined in section 1 of the Public Passenger Vehicles Act 1981 (c), and (2) a goods vehicle, as defined in section 192 of the Road Traffic Act 1988 (d)	Vulnerable customers	Customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None

TUB Category	Statutory exception	Sub Category	Non-Statutory Common Exception (granted by all water companies)	Non-Statutory Bespoke Exception (granted by individual water companies)
		Car washing businesses/ commercial car washes	None A business can use a hosepipe to clean private motor vehicles where this is done as a service to customers, where this cannot be reasonably done using a bucket.	None
3. Watering plants on domestic or other non-commercial premises using a hosepipe	Does not include watering plants that are (1) grown or kept for sale or commercial use, or (2) that are part of a National Plant Collection or temporary garden or flower display.	Vulnerable customers	Customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
		Food crops & allotments	Watering food crops at domestic premises or private allotments, where this cannot be reasonably done by watering can.	A drip or trickle irrigation watering system can be used if: - they are fitted with a pressure reducing valve and a timer - that are not handheld - that place water drip by drip directly onto the soil surface or beneath the soil surface without any surface runoff or dispersion of water through the air.
		Watering of new turf	Where this cannot be reasonably done by watering can, where the domestic turf was laid before the onset of TUBs, and for a period of four weeks which start from the date when the turf was laid	
		Watering of woodland, trees, saplings, whips, hedging	Where trees, whips, saplings and hedging have been planted within a three-year window of the imposition of the TUB (ie within the last three years of the start of a TUB). This covers tree planting by a council and/or charitable/voluntary organisation and/or under a subsidy scheme and covers larger-scale tree planting not individual trees.	
4. Cleaning a private leisure boat using a hosepipe	(1) cleaning any area of a private leisure boat which, except for doors or windows, is enclosed by a roof and walls. (2) Using a hosepipe to clean a private leisure boat for health or safety reasons.	Vulnerable customers	Customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
		Boats	A hosepipe can be used for: commercial cleaning clean vessels that are a primary residence to clean boats where fouling is causing increased fuel consumption.	None

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

TUB Category	Statutory exception	Sub Category	Non-Statutory Common Exception (granted by all water companies)	Non-Statutory Bespoke Exception (granted by individual water companies)
hosepipe, for domestic recreational use			to health reasons) to use a watering can/bucket safely.	
		Hot tubs	When filling a hot tub that is a fixed structure from empty after construction or significant refurbishment. Once it has been refilled then a hosepipe cannot be used for any subsequent filling. In this case significant refurbishment should be treated as equivalent to construction.	None
		Caravan or motorhome	Filling a water tank in a caravan or motorhome where the water is to be used for washing, cooking or sanitation purposes.	None
7. Filling or maintaining a domestic pond using a hosepipe	Filling or maintaining a domestic pond in which fish or other aquatic animals are being reared or kept in captivity.	Vulnerable customers	Customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
8. Filling or maintaining an ornamental fountain	Filling or maintaining an ornamental fountain which is in or near a fish-pond and whose purpose is to supply sufficient oxygen to the water in the pond in order to keep the fish healthy.	Vulnerable customers	Customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
9. Cleaning walls, or windows, of domestic premises using a hosepipe	Using a hosepipe to clean the walls or windows of domestic premises for health or safety reasons.	Vulnerable customers	Customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
		Non-mains connection	Where cleaning apparatus is not connected to mains supply. Electric pumps that are connected to water butts filled by rainwater are not covered by the restrictions.	None
		Graffiti	None	Removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive.
		Cleaning by a business or commercial enterprise	Cleaning the walls and windows of domestic premises where this is done by a	None

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

TUB Category	Statutory exception	Sub Category	Non-Statutory Common Exception (granted by all water companies)	Non-Statutory Bespoke Exception (granted by individual water companies)
			connected to water butts filled by rainwater are not covered by the restrictions.	
		Graffiti	None	Removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive.
		Invasive species	Where used as part of the process of preventing or controlling the spread of non-native and/or invasive species, where cannot reasonably be done using other preferred means.	None
		Cleaning by a business or a commercial enterprise	Where used to clean artificial outdoor surfaces of domestic premises where this is done by a business as a service to customers. NB For clarity: the use of water-fed poles for cleaning at height is permitted under the H&S Statutory Exception. The domestic use of a water-fed pole is not permitted under TUB	None

L.3 Non-Essential Use Bans

L3.1 Exemptions/concessions

Exemptions or concessions fall into two broad categories: statutory and discretionary. The former category is written explicitly into the legislation and includes health and safety requirements. The latter are not anywhere defined but general guidance is given in the CoP. Following the four principles, it is up to individual companies to decide how they wish to implement the discretionary exemptions/concessions suggested in the CoP. We have worked alongside other Water Resources in the South East (WRSE) water companies to align our exemptions for NEUBs. These are listed in Table L4 below.

Table L4 Table L4 NEUB exemptions

	Drought Order Category	Statutory Exemptions	Non-Statutory Common Exceptions	Non-Statutory Bespoke Exception
1	Watering outdoor plants on commercial premises	The purpose specified does not include watering plants that are: <ul style="list-style-type: none"> a) grown or kept for sale or commercial use; or b) part of a National Plant Collection or temporary garden or flower display 	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	None
2	Filling or maintaining a non-domestic swimming or paddling pool	The purpose does not include: <ul style="list-style-type: none"> a) filling or maintaining a pool that is open to the public; b) filling or maintaining a pool where necessary in the course of its construction; c) filling or maintaining a pool using a hand-held container which is filled with water drawn directly from a tap; d) filling or maintaining a pool that is designed, constructed or adapted for use in the course of a programme of medical treatment; e) filling or maintaining a pool that is used the purpose of decontaminating animals from infections or disease; f) filling or maintaining a pool that is used in the course of a programme of veterinary treatment; g) filling or maintaining a pool in which fish or other aquatic animals are being reared or kept in captivity; h) filling or maintaining a pool that is for use by pupils of a school for school swimming lessons. For the purposes of paragraph 3(2)(a), a pool is not open to the public if it may only be used by paying members of an affiliated club or organisation 	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	Swimming pools serving industrial training if considered justified Pools with religious significance Pools fitted with approved water conservation or recycling systems Pools that are subject to significant repair and renovation, defined as: "Pool renovations are classified as alterations that require substantial changes to the shape of a pool or major additions to the structure around the pool. These are treated as new pools. Activities such as retiling or resurfacing existing pools are not classed as renovations".
3	Filling or maintaining a pond	The purpose does not include: <ul style="list-style-type: none"> a) filling or maintaining a pond in which fish or other aquatic animals are being reared or kept in captivity. b) filling or maintaining a pond using a hand-held container which is filled with water drawn directly from a tap. 	None	None

Drought Order Category	Statutory Exemptions	Non-Statutory Common Exceptions	Non-Statutory Bespoke Exception
	The purpose specified in sub-paragraph (1)(b) does not include filling or maintaining a domestic pond using a hosepipe.		
4 Operating a mechanical vehicle washer	None	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	On grounds of biosecurity to prevent disease causing agents entering or leaving any place where they can pose a risk.
5 Cleaning any vehicle, boat, aircraft or railway rolling stock	Cleaning any vehicle, boat, aircraft or railway rolling stock for health and safety reasons	A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.	Small commercial operators whose business partially or wholly depends on work involving the washing of private recreational craft or valeting using hosepipes
			Those using vessels as a primary residence, which should be subject to the same constraints as any other domestic customer when restrictions are imposed
			Cases in which the fouling of hulls is causing increased fuel consumption by the drag created
			A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive
			To prevent or control the spread of non-native and/or invasive species.

Drought Order Category	Statutory Exemptions	Non-Statutory Common Exceptions	Non-Statutory Bespoke Exception
6	Cleaning any exterior part of a non-domestic building or non-domestic wall	Cleaning any exterior part of a non-domestic building or a non-domestic wall for health and safety reasons	<p>A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.</p> <p>Small businesses whose sole operations are cleaning of non-domestic buildings using hosepipes</p> <p>Low water use technologies</p> <p>A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive</p>
7	Cleaning a window of non-domestic building	Cleaning a window of non-domestic building using a hosepipe for health and safety reasons	<p>A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.</p> <p>Businesses involved in cleaning windows in non-domestic premises using water-fed poles or similar. An alternative (non-potable) water source</p>
8	Cleaning industrial plant	Cleaning industrial plant using a hosepipe for health and safety reasons	<p>A hosepipe may be used by customers on the Priority Services Register who are physically unable or who cannot make adjustments (due to health reasons) to use a watering can/bucket safely.</p> <p>A hosepipe can be used as part of the process of removing graffiti from domestic premises when the graffiti is a hate crime, insulting or offensive</p>
9	Suppressing dust	Suppressing dust using a hosepipe for health and safety reasons	None
10	Operating cisterns on unoccupied buildings	None	None

The Drought Direction 2011 sets out the restrictions that can be applied under a NEUB. The restrictions are for commercial and industrial water use, that can be imposed under an ordinary drought order. A water undertaker may apply to Defra for an ordinary drought order under Section

73(1) and 74(2) (b) of the Water Resources Act 1991 if it can be shown that the 'exceptional shortage of rain' will lead to a serious deficiency of supplies of water.

L3.2 Implementation policy

The measures included in a NEUB are significant and as such we would not introduce them unless the water situation was becoming very serious. Prior to a NEUB application, we would discuss the need for such a measure with Defra as well as the EA to ensure that they were fully appraised of the situation and aware of the reasons why such a measure is necessary.

We have included an allowance for up to a 12-week period to allow for the submission of an application through to the granting, or otherwise, of the NEUB.

Within the application process, the principal document submitted to Defra is the 'Statement of Reasons'. In the statement of reasons, we would set out the case for seeking authorisation to implement NEUB restrictions. The report would explain in detail why and how the exceptional shortage of rainfall is likely to lead to a serious deficiency in water supply and set out, in the meantime, all of the necessary drought interventions that we would be carrying out to avoid the need for NEUBs. An application for a NEUB must be published in one or more local newspapers circulating in the area affected by the NEUB and in the London Gazette, as well as being served on persons prescribed in WRA91. Objections to the application may be made to the Secretary of State within 7 days from the date of service or publication. Once granted, we must give at least 72 hours' notice of the imposition of the NEUB by publishing the NEUB in one or more local newspapers circulating in the affected area.

Before we would consider applying for and implementing a NEUB, the DEL would need to have been escalated to Level 3. However, we would need to be clear that such an action would significantly help to avoid Level 4 emergency water use restrictions.

Because of the serious conditions of drought severity under which we would consider a NEUB, it is very likely all ten measures listed in Table L4 would be applied for simultaneously.

L.4 Summary of demand-side measures and activities

Table L5 Demand-side measures and activities

Table L shows the range of demand-side measures that fall within the four DEL levels.

Table L5 Demand-side measures and activities

Drought Event Level		DEL 1	DEL 3		DEL 4
		Media Water efficiency (L1)	TUB (L2)	NEUB (L3)	EDO (L4)
TW activities	Media campaign and Water Efficiency Activities				
	Enhanced media campaign and Water Efficiency Activities				
	Leakage reduction				
Garden	Using a sprinkler or an unattended hosepipe				
	Watering a 'garden' using a hosepipe* (Garden includes: parks, gardens open to the public, lawns, grass verges, areas of grass used for sport or recreation, allotment gardens, any areas of an allotment used for non-commercial purposes, any other green space)				
	Watering plants on domestic or other non-commercial premises using a hosepipe				
	Watering an allotment or garden that is connected to domestic premises and watering plants on domestic premises using a hosepipe, by people with severe mobility problems who hold a current Blue Badge as issued by their local authority		TUB Exemption	TUB/NEUB Exemption	
	Watering an area of grass or artificial outdoor surfaces used for sport or recreation, where this is required in connection with a specific national or international sporting event		TUB Exemption	TUB/NEUB Exemption	
	Using a hosepipe to clean domestic paths or patios, where this is done as a service to customers in the course of a business		TUB Exemption		
	Using drip or trickle irrigation watering systems that are not handheld, that place water drip by drip directly onto the soil surface or beneath the soil surface, without any surface run off or dispersion of water through the air using a jet or mist		TUB Exemption		
	Using a hosepipe to water a garden or to water plants where such watering is		TUB		

Drought Event Level					
		DEL 1	DEL 3		DEL 4
		Media Water efficiency (L1)	TUB (L2)	NEUB (L3)	EDO (L4)
	restricted to newly laid turf, newly sown lawns, newly planted trees, shrubs and plants when the laying, sowing or planting has been carried out as service to customers in the course of a business. This exemption only applies for a period of 28 days from the day of planting, sowing or turf laying.		Exemption		
	Drawing water, using a hosepipe, for domestic recreational use				
	Filling or maintaining an ornamental fountain				
	Cleaning paths or patios using a hosepipe				
	Cleaning other artificial outdoor surfaces using a hosepipe.				
	Watering outdoor plants on commercial premises				
	Ponds/pools	Filling or maintaining a domestic swimming or paddling pool (except when using hand held containers filled directly from a tap)			
Filling or maintaining a non-domestic swimming or paddling pool (except when using hand held containers filled directly from a tap)					
Filling or maintaining a domestic pond using a hosepipe (excluding fish ponds)					
Filling or maintaining a pond (excluding fish ponds)					
Vehicles	Cleaning a private motor-vehicle using a hosepipe				
	Using a hosepipe to clean a private motor vehicle, where this is done as a service to customers in the course of a business		TUB Exemption		
	Cleaning a private leisure boat using a hosepipe				
	Operating a mechanical vehicle-washer				
	Cleaning any vehicle, boat, aircraft or railway rolling stock				
Buildings	Cleaning walls, or windows, of domestic premises using a hosepipe				
	Using a hosepipe to clean walls and windows of domestic premises, where this is done as a service to customers in the course of a business		TUB Exemption		
	Cleaning non-domestic premises				

Drought Event Level		DEL 1	DEL 3		DEL 4
		Media Water efficiency (L1)	TUB (L2)	NEUB (L3)	EDO (L4)
	Cleaning a window of a non-domestic building				
Industry	Cleaning industrial plant				
	Suppressing dust				
	Operating cisterns.				

	Activity permitted
	Activity exempt from legislation; permitted
	Activity prohibited

Levels of Service	
L1	Level 1
L2	Level 2
L3	Level 3
L4	Level 4

* Using a hosepipe to water a 'garden' for health and safety reasons is not to be treated as a category of use prohibited under The Act. We would expect that any organisation seeking to rely on the health and safety exemption would carry out and document their assessment of risk, prior to carrying out any watering with a hosepipe during the period of the TUB or NEUB, and will robustly challenge any organisation watering excessively for this purpose.

L.5 Savings from demand-side restrictions

Savings assumed for our demand-side measures are based on our previous experience of implementing demand side restrictions and are underpinned by the same methodology as employed since the Drought Plan 2010..

During 2025, Thames Water, South East Water, Southern Water and Yorkshire water implemented a TUB. An UKWIR project was set up to understand the demand benefits that the TUBs delivered, and under what conditions. The project is due to report end of April 2026 and therefore the results are not currently available but should be available for inclusion in our final Plan. We will be working with the WRSE companies to review the findings and determine how to incorporate them into planning assumptions for Drought Plans and WRMPs within the south east. We will use this information to update our assumptions once the work has concluded.

We are aware from our own analysis of our smart meter data, that the demand savings achieved from our 2025 TUB in SWOX are lower than we have previously assumed and that this is a risk for our Plan. To account for this risk, we have included an indicative range of potential savings

ranging from the lower levels achieved in 2025, to the higher level of savings underpinned by the same methodology as employed since the Drought Plan 2010. This range reflects the high level of uncertainty inherent in the levels of savings that could be achieved from the imposition of a TUB.

Demand savings are given in section 4.5.2 of the main Drought Plan for London and Thames Valley WRZs and represent the maximum savings that can be expected during the peak month of July when pressure on water resources is likely to be greatest.

Table L6 shows for the London WRZ the month-by-month range for demand-side savings for the Service Level up to and including Level 4.

Table L6 Estimates for the impacts of month-by-month demand reduction for London WRZ expressed as % range of the Distribution Input

Restriction level	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Level 1	0.5 – 1.1	0.5 – 1.2	0.5 – 1.2	0.5 – 1.3	0.5 – 1.5	0.5 – 2.2	0.5 – 2.2	0.5 – 2.1	0.5 – 1.3	0.5 – 1.2	0.5 – 1.2	0.5 – 1.2
Level 2	1.2 – 2.9	1.2 – 2.9	1.2 – 3.0	1.2 – 4.3	1.2 – 5.2	1.2 – 10.3	1.2 – 10.3	1.2 – 9.8	1.2 – 4.3	1.2 – 3.5	1.2 – 3.2	1.2 – 3.1
Level 3	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4	1.0 -1.4
Cumulative savings, Levels 1-3	2.7 - 5.4	2.7 - 5.5	2.7 - 5.6	2.7 - 7.0	2.7 - 8.1	2.7 - 13.9	2.7 - 14.5	2.7 - 13.3	2.7 - 7.0	2.7 - 6.1	2.7 - 5.8	2.7 - 5.7
Level 4	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0
Total cumulative savings Levels 1-4	20.7 - 23.4	20.7 - 23.5	20.7 - 23.6	20.7 - 25.0	20.7 - 26.1	20.7 - 31.9	20.7 - 32.5	20.7 - 31.3	20.7 - 25.0	20.7 - 24.1	20.7 - 23.8	20.7 – 23.7

Table L7 shows the equivalent range of savings for the Thames Valley WRZs. Largely due to the proportionally higher concentration of gardens, slightly higher savings are gained for the Thames Valley WRZs. We have included a range for the percentage demand reduction due to uncertainty. This is as a result of learnings from 2025.

Table L7 Estimates for the impacts of demand reduction for Thames Valley* expressed as % range of the Distribution Input

Level of restriction	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Level 1	0.9 – 1.3	0.9 – 1.4	0.9 – 1.4	0.9 – 1.8	0.9 – 1.9	0.9 – 3.6	0.9 – 3.8	0.9 – 3.7	0.9 – 1.6	0.9 – 1.4	0.9 – 1.4	0.9 – 1.4
Level 2	2.5 - 3.2	2.5 - 3.3	2.5 - 3.4	2.5 - 5.2	2.5 - 5.7	2.5 - 13.5	2.5 - 14.1	2.5 - 13.6	2.5 - 4.6	2.5 - 3.7	2.5 - 3.4	2.5 - 3.3
Level 3	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2	1.0 -1.2
Cumulative savings, Levels 1-3	4.4 – 5.7	4.4 – 5.9	4.4 – 6.0	4.4 – 8.2	4.4 – 8.8	4.4 – 18.3	4.4 – 19.1	4.4 – 18.5	4.4 – 7.4	4.4 – 6.3	4.4 – 6.0	4.4 – 5.9
Level 4	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0	18.0 – 18.0
Total cumulative savings Levels 1-4	22.4 - 23.7	22.4 - 23.9	22.4 - 24.0	22.4 - 26.2	22.4 - 26.8	22.4 - 36.3	22.4 - 37.1	22.4 - 36.5	22.4 - 25.4	22.4 - 24.3	22.4 - 24.0	22.4 – 23.9

*Thames Valley WRZs are: SWOX, Kennet Valley, Henley, SWA and Guildford

The savings are given below for London and Thames Valley WRZs and represent the range of savings that can be expected during the peak month of July when pressure on water resources is greatest.

Level of service London WRZ- Peak month saving as a percentage of total demand

- Level 1: Providing a range of 0.5% to 2.2% maximum reduction in demand;
- Level 2: Additional range of 1.2% to 10.9% (cumulative 1.7%-13.1%) maximum reduction in demand;
- Level 3: Additional range of 1% to 1.4% (cumulative 2.7%-14.5%) maximum reduction in demand;
- Level 4: Additional 18% (cumulative 20.7%-32.5%) maximum reduction in Demand.

Level of service Thames Valley WRZs- Peak month saving as a percentage of total demand

- Level 1: Providing a range of 0.9% to 3.8% maximum reduction in demand;
- Level 2: Additional range of 2.5% to 14.1% (cumulative 3.4%-17.9%) maximum reduction in Unrestricted Demand;
- Level 3: Additional range of 1% to 1.2% (cumulative 4.4%-19.1%) maximum reduction in demand;
- Level 4: Additional 18% (cumulative 22.437.1%) maximum reduction in Demand.

L.6 Customer Research

L6.1 2025/26 South East Water Companies Drought Plan Research

Thames Water as part of Water Resources South East (WRSE) commissioned a study to understand and explore the views of customers from all six companies regarding their priorities and preferences for demand and supply actions that could be taken in severe drought (Level 3b) conditions.

The aim of this research was to understand and explore the views of customers from all six companies regarding their priorities and preferences for actions that could be taken (both supply and demand-side) in severe drought conditions. These are defined as those conditions that meet level 3b drought conditions, as determined by the Environment Agency.

Underpinning this aim, there were three specific research objectives:

- To understand the impact of severe drought (level 3b) on customers
- To develop a framework for communication to customers across drought levels
- To ascertain actions taken beyond existing drought plans that would be acceptable to customers

The research was completed in three phases. The first was a qualitative phase that assessed suggested supply and demand actions and how these actions would be communicated. The second phase was quantitative with an aim of ranking acceptance/preference of the actions and communication messages, this phase included 2500 interviews representing six water

companies. The third phase was a co-creation workshop to formulate the final research recommendations for incorporation into drought plans.

L6.1.1 Summary of findings

There was a discrepancy between perceptions and the reality of severe drought.

Supply and demand side measures must be pragmatic, effective and cost-effective;

- Findings indicate that bill incentives to reduce water usage are acceptable, but penalties are not
- Neighbouring water companies sharing resources was a preference
- Fairness was a key consideration in preferences
- Vulnerable customers must be protected

Education through communication is key;

- Provide clear, simple and practical messages
- Deliver communications through multiple channels
- Enhance effectiveness by using trusted credible voices
- Targeted messaging to recognise the complexity of water consumption behaviour
- Inform all customers of exemptions/enhanced protection eligibility criteria for vulnerable customers to avoid stigmatisation
- Provide diverse and accessible communication formats to reach/be understood by all types of customer

L6.2 2011 Drought Plan Research

L6.2.1 Objectives and methodology

We commissioned an independent market research company to conduct a survey for which the over-arching objective was to gain customer feedback (domestic and commercial) and views regarding key elements of the revised draft, specifically:

- Media campaign
- Temporary Use Ban and options for exemptions and phasing
- New powers regarding Drought Direction 2011

In all, three surveys were conducted, the first two with domestic customers and the third with commercial customers. In regard to the domestic customers, a two-phase research programme was conducted starting with a qualitative phase of three online group discussions in the week beginning 13 June 2011, composed of:

- domestic customers with private garden and / or allotment – 7 participants
- domestic customers with private garden and / or allotment – 8 participants
- domestic customers without private garden or allotment – 9 participants

Participants were recruited from the Thames Water customer panel. Within each group a mixture of consumers was surveyed by age, socio-economic group, ethnicity, location (London and Thames Valley), garden/allotment ownership and presence of a water meter.

A second domestic survey was conducted between 24 June and 3 July in the form of an online quantitative phase in which 1299 domestic customers were emailed and invited to participate, from which a good response rate of 62% (804) was achieved.

A quantitative survey of commercial customers was conducted between 6 July – 22 July in which 57 relevant businesses and business consortiums were sent a questionnaire. The response was unfortunately disappointing with replies dominated by cricket clubs (NB this was because the English and Welsh Cricket Club Board forwarded the questionnaire to all its members), with the only other replies received from:

- Turf Grass Growers Association
- Federation of Window Cleaners
- Horticultural Trades Association
- Racecourse Association
- Heathrow Airport Ltd.

In all three surveys participants were informed of the nature of the Temporary Use Ban and NEUB measures. In the domestic qualitative survey participants were asked about their views about their water supply and what they perceived to be the main issues facing water companies today. The customer panel were shown the short-list of exemptions, Table L3, and asked for their views on their acceptability.

L6.2.2 Findings- Qualitative survey

Attitudes to a media campaign

Most participants felt that they used reasonable amounts of water and that a media campaign would have little effect on them but may impact others. They were already careful with the amount of water they used. They know what measures to take to reduce water use and it is 'common sense'. Participants said key messages in a media campaign should be:

- Encouragement to behave responsibly
- Communication of facts e.g. top tips, how much rainfall does there need to be to make a drought, who decides there is a drought.
- Communicating what may happen if action is not taken.
- Demonstrating water companies are doing their bit.
- Stressing both the personal benefits (financial) and wider benefits (environmental).

Temporary Use Ban

There was a high level of agreement among participants that it was acceptable to ban all eleven activities. In discussing possible exemptions, there was a high level of agreement that all the short-listed options were acceptable. Interestingly, physical or mobility impairment was not on the initial short-list of exemptions but was spontaneously suggested by the participants and subsequently added to the short-list.

Attitudes on NUEB measures

Participants were given a list of activities that could be banned if a Drought Order were to be introduced. There was a broad level of agreement with the measures proposed. Those participants who were broadly in favour of the measures had a number of associated caveats:

- Businesses should be given sufficient warning and notice of the measures to allow them to prepare.
- Health and safety should be a factor, i.e. suppressing dust etc. could be important in some circumstances, so should be exempt if health and safety is at risk. NB the statutory exemptions will generally cover these concerns.
- They wanted reassurance about the objectivity and accountability of the decision to introduce a Drought Order and the associated stringent measures.

One possibility discussed was the exemption of mechanical car washers that are water efficient, for example, an exemption for washers that recycle water and use less than a certain amount of water per vehicle. Participants had mixed views on allowing mechanical car washers that are water efficient if a Drought Order was introduced. Some felt that protecting small businesses was a good idea, but others felt that washing cars was not a priority activity and did not warrant an exemption.

[L6.2.3 Findings- Quantitative domestic survey](#)

[Temporary Use Ban](#)

The key findings can be summarised as:

- Overall, garden or allotment ownership appeared to have little impact on views.
- No significant difference in attitude between London and Thames Valley customers.
- Almost half of respondents would not be affected by any of the measures.
- The top three activities affecting the most respondents were:
 - Watering a garden or allotment using a hosepipe
 - Watering plants on domestic properties using a hosepipe
 - Cleaning a private vehicle using a hosepipe
- 75% of respondents agreed with restrictions on five or more proposed Temporary Use Ban measures, 21% agreed with all.
- Younger respondents (16 to 34) were more negative about the ban and had lower levels of agreement with all of the individual measures.

The profile of levels of agreement with the individual banned measures is given in Figure LL2. The most notable point is that whilst watering gardens and plants were the most 'unpopular' measure relative to the overall set of measures, over 68% either agreed with or were neutral on the instigation of those measures.

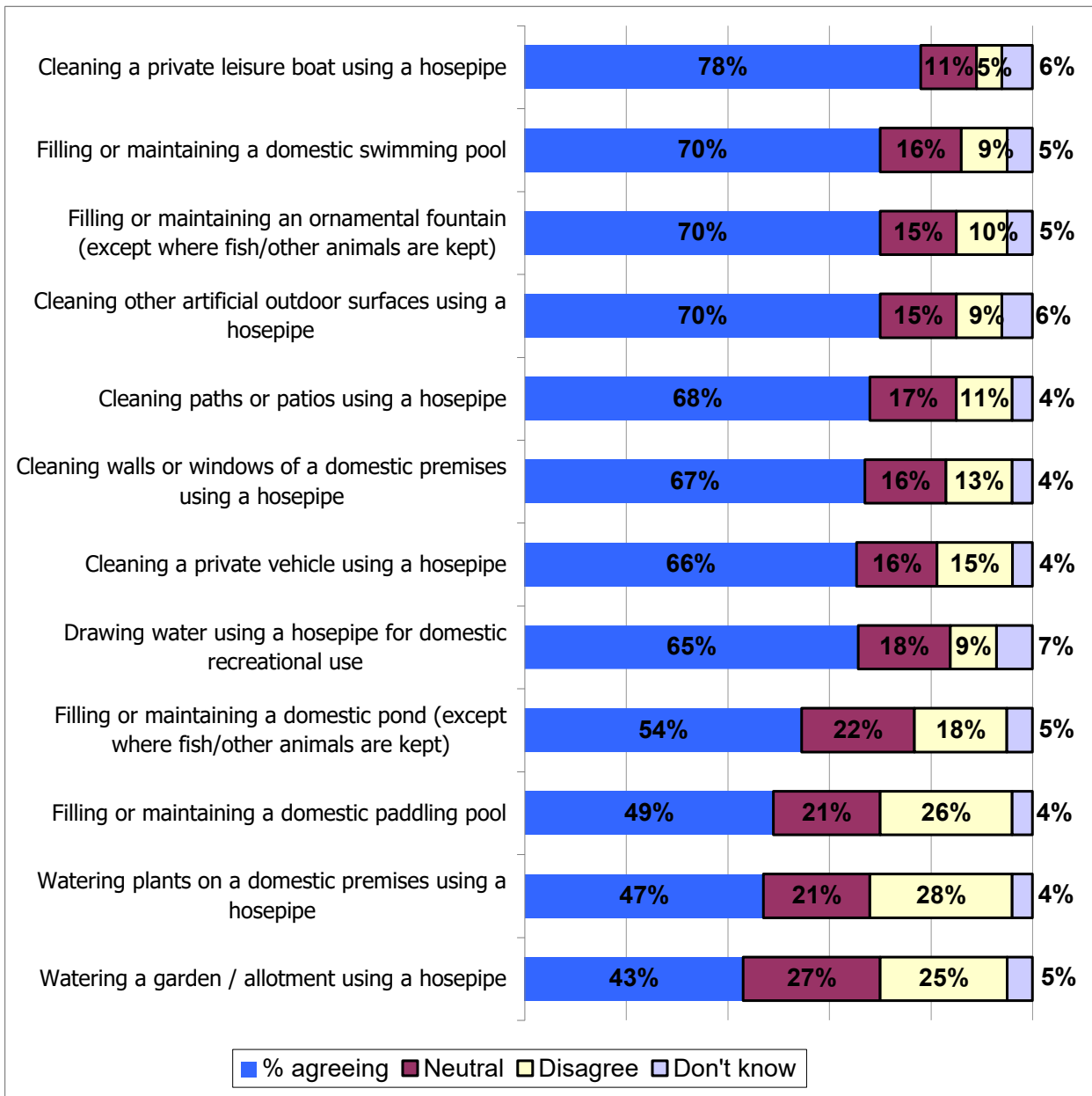


Figure L2 Levels of agreement on activities banned under the Temporary Ban

Exemptions

As shown below in Figure L3, based on the results all but offensive graffiti and gardens open to the public could be said to have good customer support.

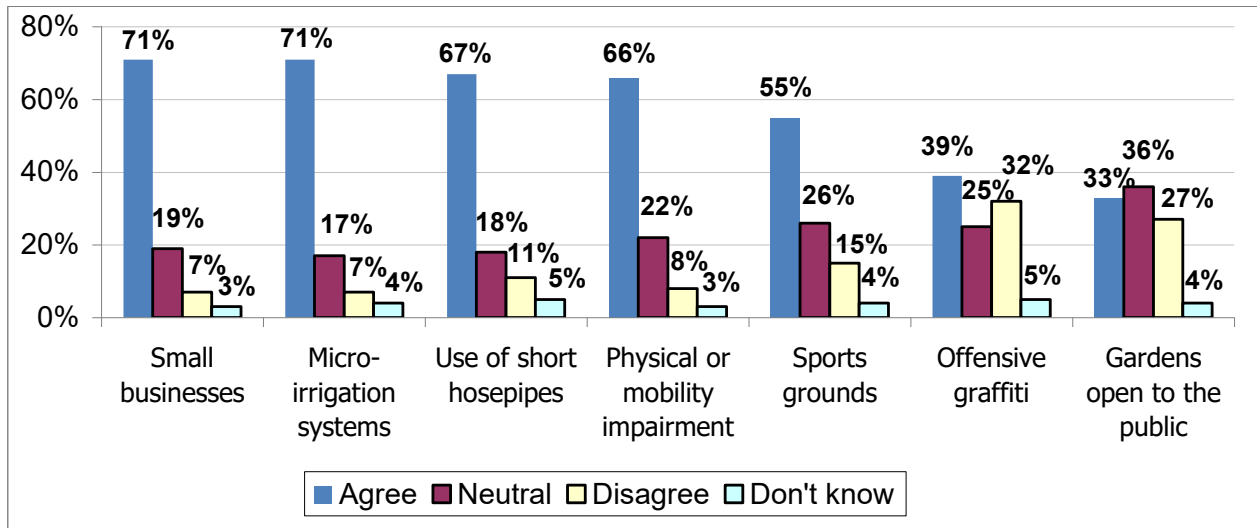


Figure L3 Levels of agreement on possible Temporary Use Ban exemptions

Phasing

In this context, ‘phasing’ is when one or more categories of use are excluded from the list of banned water use activities until a later phase of the drought event. The wider range of powers that is now available for Temporary Use Bans means that water companies should give careful consideration to the phasing of demand restrictions. A more flexible approach to the implementation of the legislation is now possible, for example first banning the watering of lawns and verges, later followed by plants grown as food. However, under the new legislation, each phase is to be treated afresh, and so a formal period of notice would have to be given prior to the introduction of each new phase, in our case, this would be 3 weeks. Multiple phasing would also tend to increase customer uncertainty during the course of the drought as to what activity was or was not currently banned.

In the survey, two phases gained a 2 to 1 majority over one phase. However, the principal reason for preferring two phases was either allowing more time to adjust or it lessens the impact on the customer. Unsurprisingly, there was a majority consensus on watering a garden using a hosepipe and watering plants on domestic or other non-commercial premises using a hosepipe being the two activities left for Phase 2. However, this option could reasonably be rejected on grounds of such a lax policy on reducing water use would not pass the proportionality test (2nd Principle of Code of Practice). Clearly, a two-phase approach with the highest water uses being in the second phase would not demonstrate a clear commitment to reducing demand and could be considered by Defra or the Environment Agency as an ineffective use of full powers. The principal reason given for just having one phase was the obvious one: less confusing/easier to understand.

L6.2.4 Findings- Commercial Survey

Overall there was good agreement with domestic survey results. Again there is support for banning most activities, without exemptions being required. However, 'watering plants at a commercial garden premises (excluding those grown or kept for sale)' was only agreed with if exemptions were to be applied, as were 'cleaning of industrial plant' and 'suppressing dust'. The only activity where a ban was disagreed with outright was 'operating cisterns'. This was for health and safety reasons. However, there has likely been some misunderstanding on the conditions of the ban, as the legislation refers to "operating a cistern in any building that is unoccupied and closed".

In regard to the suggested exemptions under the Temporary Use Ban the respondents did not agree with the exemptions on 'offensive graffiti' and 'gardens open to public', a very similar result to the quantitative domestic survey.

Two phases were preferred with watering gardens and plants in the 2nd phase, an identical result to the domestic survey.

For NEUB exemptions, 'short hosepipe', 'small businesses' and 'mechanical car washers' were all endorsed.

Understandably, health and safety was often cited as a reason for exempting an activity. Cricket clubs all made the case for watering the cricket square, often for health and safety reasons.