

Blueprint for Water response: Drought – how it is managed in England

10th January 2025

This consultation response is on behalf of Wildlife and Countryside Link (Link), a coalition bringing together 86 organisations to campaign for the natural world.

This response is supported by Amphibian and Reptile Conservation Trust, Angling Trust, Freshwater Habitats Trust, Friends of the Earth England, Froglife, Institute of Fisheries Management, National Trust, Paddle UK, River Action, RSPB, Sustainability First, The Rivers Trust, The Wildlife Trusts, Waterwise

Summary

Blueprint for Water¹ welcomes the opportunity to respond to this consultation on drought and how it is managed in England.

The document ‘Drought – How we manage it in England’ clearly describes some aspects of drought management. We suggest that further clarification and detail is required to ensure that all actions and processes are fully transparent and accountable, including with regards to New Appointments and Variations, the role of messaging and comms, monitoring, and emergency drought planning.

However, we need a more proactive, holistic approach to managing drought in England than that which is set out within the document. Drought management in practice remains largely comprised of reactive measures, and focused overwhelmingly on public water supply whilst neglecting environmental and agricultural impacts.

¹ [Blueprint for Water](#), part of Wildlife and Countryside Link, is a unique coalition of environmental, water efficiency, fisheries and recreational organisations that come together to form a powerful joint voice across a range of water-based issues.

We need to build both natural and industry resilience to reduce harmful impacts on public water supply, agriculture, and the environment. We set out a number of recommendations in our response for how this could be achieved, including:

- Sustained, year-round engagement with all stakeholders on the importance of water efficiency.
- Updated national guidance to allow a more proactive use of measures such as TUBs, which should be considered as drought management tools rather than systemic failures.
- Better use of environmental monitoring before, during and after drought events, drawing on the work of Natural England to develop site-based datasets to track drought impacts on wildlife.
- Greater use of nature-based and demand management solutions, to build environmental and industry resilience to water scarcity.
- Greater flexibility in the abstraction licensing system to allow a more integrated approach to water and land management.
- Explicitly linking drought management and the Land Use Framework.

Furthermore, we note that this consultation, and the consultation on water company drought plan guidance, are being held during the same period as multiple consultations on flooding. It is disappointing that the relationship between these issues is not acknowledged in these consultations, or in the proposed approaches to management and mitigation. A more holistic approach to managing water is required.

We would be pleased to discuss any of the points raised in our response – or in our response to any of these wider flooding and drought consultations - further.

Questions

Are you responding as an individual or on behalf of an organisation?

Please choose one of the following:

Responding on behalf of an organisation or group (for example, charity, not-for-profit organisation, trading body)

If you're responding on behalf of an organisation or group, what is the name of the organisation or group?

Wildlife and Countryside Link.

What sector do you represent?

Please choose one of the following:

Environment.

Email: eleanor@wcl.org.uk

Can we publish your response? This is a required question.

Yes.

Question 1. Before reading 'Drought: how it is managed in England', how familiar would you say you were about drought management in England?

Please choose one of the following:

Very.

Question 2. Refer to Section 1: 'Drought in England: an overview'. Does this section clearly describe drought in England?

Please choose one of the following:

Agree.

Why do you think this?

The section clearly describes the types of drought in England and gives clear examples.

However, further detail could be included to further improve this section. We support the comments that have been submitted by Blueprint for Water member Waterwise, regarding the need to reference the impact of heatwaves on water supply droughts, given that these conditions can rapidly lead to water supply shortages.

As acknowledged in the document, climate change means that severe weather events such as droughts are increasing in frequency and severity. There is also an increased likelihood of flood and drought events happening at the same time. A more holistic approach to water management across catchments is required to build resilience to extreme weather. The document could go further to set out how land use, land use change, and nature-based solutions can play a vital role in building this resilience. We discuss this further in response to later questions.

Question 3. Refer to Section 2: ‘Drought impacts and mitigations’. Does this section clearly describe the impacts of drought and some of the actions other sectors take to mitigate these impacts?

Please choose one of the following:

Neither agree nor disagree.

Why do you think this?

The section clearly describes some of the impacts of drought, and some of the actions that sectors might currently take to mitigate these impacts.

However, further detail is required to ensure that these actions and processes are fully transparent and accountable. For example, to further unpack the decision-making process of the Secretary of State with regards to drought orders, expectations for water resource planning and drought management, and the drought impacts and responsibilities of other sectors – for example, the energy sector. Greater consideration of agriculture and horticulture is also required.

In addition, as noted above, a more holistic and proactive approach is required for effective drought management than that which is described in the document. We share further thoughts and recommendations on how this could be achieved in response to later questions in the consultation.

Question 4. Refer to Section 3: 'Planning, management and response'. Does this section clearly describe the responsibilities of the Environment Agency, government, public bodies, regulators, water companies and local responders in drought planning, management and response?

Please choose one of the following:

Neither agree nor disagree.

Why do you think this?

This section clearly describes the responsibilities of the organisations listed above, but further detail would be welcome. For example, it is unclear from the document what the responsibilities of New Appointments and Variations (NAVs) are.

Further detail could also be provided regarding water company emergency plans. Given that these plans are not published, it is important that they are scrutinised to ensure that they are fit for purpose, and that key organisations are aware of and engaged with them. For example, does Government provide steer on priorities for these plans, and can details of this steer be shared with wider stakeholders? It is our view that a strong steer should be provided to the sector by Government so that water supply priorities in an emergency drought situation are based on Government policy rather than determined by individual companies.

Question 5. Refer to Section 4: 'Our drought teams and actions'. Does this section clearly describe the Environment Agency's drought stages, response arrangements, drought actions and triggers, monitoring and data?

Please choose one of the following:

Neither agree nor disagree.

Why do you think this?

The section describes the Environment Agency's drought stages, response arrangements, drought actions and triggers, monitoring and data. However, some roles and actions are missing from the document. It is unclear whether this is due to the description being incomplete, or if the approach currently taken does not sufficiently include these actions.

For example, the document does not include 'messaging' or 'comms' within the responsibilities of the Environment Agency, instead describing actions in a separate 'communications' section of the document. Similarly, it does not mention the need for messaging or comms during the normal 'green' stage.

The Environment Agency should hold some responsibility for drought messaging; relying on water companies alone to deliver this will not be effective, particularly given that consumer trust in companies is at an all-time low.² Additionally, messaging and comms regarding the importance of saving water and preparedness for drought should be sustained year-round, rather than being limited to hot dry periods when impacts are already being felt. We discuss this further in response to later questions in the consultation.

In sections 4.8.2 and 4.8.3, we suggest further clarity is needed with regards to 'ordinary drought orders' and 'environmental drought orders'. A glossary of key terminology and consistent phrasing would help ensure clear understanding throughout the document.

Further detail would be welcome in section 4.9.1. to clarify how Environment Agency monitoring complements ecological monitoring undertaken by Natural England. There are opportunities for eNGOs to supplement this with further monitoring evidence including from sites that they manage.

During the drought of 2022, regulators were caught out by the speed of its onset. The Environment Agency did not change its area status early enough to protect the environment and the existing water resources. Section 4 of the 'Drought: how it is managed in England' document is clear about the stages but doesn't state what the triggers for change are. Based on the experience of 2022, triggers need to be reviewed with the aim of allowing the status of 'prolonged dry weather' and 'drought' to be used sooner within the cycle.

² Consumer Council for Water. (2024). [Trust in water companies reaches a 13-year low amid falling customer satisfaction - CCW](#) 'Trust in water companies reaches a 13-year low amid falling customer satisfaction'.

Question 6. Considering your responses to questions 4 and 5, how well do you understand the scope and purpose of Environment Agency area drought plans described in sections 3 and 4?

Please choose one of the following:

Moderately.

Why do you think this?

As highlighted in response to the previous questions, we would welcome some further detail/clarity with regards to the Agency's role in comms and management, the responsibilities of NAVs, and details and/or steer regarding emergency drought planning.

We would also welcome greater transparency regarding area plans themselves. For example, could area plans be shared with stakeholders at draft stage for consultation?

Question 7. Refer to Section 5: 'How we communicate with others'. Does this section clearly describe the Environment Agency's role in drought communications and the tools we use to do so?

Please choose one of the following:

Neither agree nor disagree.

Why do you think this?

As noted above there is a disconnect between this section of the document and section 4, where drought comms is not listed as a 'main Environment Agency action' within any of the drought stages. For clarity, the Agency's role in comms and messaging should be included within Section 4. Messaging and comms regarding water saving and drought should take place year-round, with both Government and the Environment Agency taking responsibility and leadership; this cannot be left to water companies alone.

Further detail could be added to improve this section. For example, to explain at the outset that the Agency develops a 'drought communications plan', and that the National Drought Group Communications sub-group also leads on a cross-sector communications plan. The interaction and responsibilities of these groups should be clarified.

Question 8. Refer to Section 6: 'Recovery'. Does this section clearly describe the Environment Agency's role in recovery and how we seek to learn from each drought?

Please choose one of the following:

Agree.

Why do you think this?

The section clearly describes the Environment Agency's role in recovery.

We welcome the Environment Agency's collaborative approach to work with stakeholders post-drought to develop lessons learned. This could be enhanced through making use of and building on tools developed by stakeholders – for example, the [evaluation toolkit](#) developed by Waterwise with the Environment Agency to evaluate the effectiveness of demand reduction campaigns.

Question 9. After reading 'Drought: how it is managed in England' and answering these questions, are there any inaccuracies you would like to highlight or any other suggested improvements you would like to make?

As highlighted in response to the previous questions, we would welcome some further detail/clarity with regards to the Agency's role in comms and management, the responsibilities of NAVs, and details and/or steer regarding emergency drought planning.

A more holistic and proactive approach is required for effective drought management than that which is described in the document. We share further thoughts and recommendations on how this could be achieved in response to later questions in the consultation.

Question 10. After reading ‘Drought: how it is managed in England’ and answering these questions, do you have a better understanding of how droughts are managed in England, the respective roles of the organisations and groups involved, and how they work together to minimise the impacts of drought?

Please choose one of the following:

Moderately.

Question 11. Which Environment Agency operational areas are you most interested in with respect to drought?

Select any that apply:

All (National).

Question 12. What are your thoughts about how drought has been managed in your local area?

Blueprint for Water, part of Wildlife and Countryside Link, is based in England and works at a national level. We are therefore answering from a national perspective.

Current approaches to managing drought are predominantly reactive, and focused overwhelmingly on public water supply (PWS) impacts, whilst neglecting environmental and agricultural impacts. For example, Temporary Use Bans (TUBs) only being implemented once a PWS drought has been declared, or water saving comms being limited to hot, dry periods when environmental and agricultural impacts are already being felt. In the 2022 drought, TUBs were only issued in August, which was too late.

This reflects a trend more broadly within the UK of a lack of preparedness, insufficient resilience to, and failures to apply lessons learnt thus far with regards to extreme weather events including drought.³ This was exemplified by the steer given from then-Secretary of State Therese Coffey to the water industry in summer 2023, to explore using more optimistic climate

³ Wildlife and Countryside Link submitted evidence to the February 2024 Public Accounts Committee inquiry into resilience to extreme weather, which provides further detail and evidence:

[WCL Response PAC Inquiry Extreme Weather Resilience Feb 2024.pdf](#)

scenarios in their water resources modelling in order to reduce costs.⁴ It is essential that Government acknowledges the critical state of water scarcity, the increasing risk of extreme weather events such as drought, and therefore provides clear national steer on the need for a long-term proactive approach to build resilience.

Furthermore, there is an awareness gap amongst stakeholders and customers which urgently needs to be addressed. The Consumer Council for Water (CCW) found that during the 2022 drought, there was confusion amongst customers – both household and non-household – about who was affected and what restrictions were in place.

We need a more proactive, holistic approach to managing drought in England, to build both natural and industry resilience, and to reduce harmful impacts on public water supply, agriculture, and the environment. For example, such an approach should include:

- Sustained engagement with consumers, businesses and communities on the importance of water-efficiency. This should take place year-round; before, during and after drought events.
- This should be supported through greater use of smart meter data, to target messaging and support incentives. Smart meters are a critical tool for engaging people with their water use, and therefore driving demand reduction.
- Full evaluation of the effectiveness of demand reduction campaigns. For example, using the [evaluation toolkit](#) developed by Waterwise with the Environment Agency.
- Updated national guidance to allow a more proactive use of measures such as TUBs, alongside comms and messaging efforts to pitch these as drought management tools rather than systemic failures. Just as we cannot expect to build flood defences to protect against every future flood, we cannot rely on water resources infrastructure alone to guard against all future droughts. As such, the use of TUBs as a tool to stave off impacts upon water supply and the environment should increasingly be considered a legitimate tool to be used in mitigating the impacts of a drought, rather than being seen as a sign of failure by water companies to properly plan. The normalisation and the acceptance of TUBs by society must be increased through their increased use for environmental and agricultural protection, (i.e. as a tool to benefit multiple sectors), and encouragement, rather than discouragement of companies, in their use. This is in contrast to the use of Drought Permits and Drought Orders by the sector, which will

⁴ Wildlife and Countryside Link wrote to the then-Secretary of State to express concern at this approach in August 2023: [Water firms urged to save money by diluting climate change plans](#)

typically result in greater impact upon the environment at a time when it is already under severe stress.

- Better use of environmental monitoring before, during and after drought events, drawing on the work of Natural England to develop site-based datasets to track drought impacts on wildlife (including fish). Data and expertise from eNGOs who own and manage land could also be incorporated into these monitoring efforts.
- Improved coordination and communication with and via water retailers, business water users, and NAVs.
- Greater use of nature-based⁵ and demand management solutions, to build environmental and industry resilience to water scarcity.
- Building on the work of CEH, the CaBA technical team and CaBA partnerships to make water resource information more widely available to partnerships and communities.⁶
- Greater flexibility in the abstraction licensing system to maximise the opportunity to trade licenses and encourage abstractors to give up sections of their license which are rarely used.
- Ensuring that abstraction management is linked to the Land Use Framework. The largest demand component of the water balance is actual evapotranspiration, not abstraction, and is inextricably linked to the cropping choices that land managers make. A justified focus on food security has the potential to significantly reduce the water resources available for PWS and the environment. Crop yield is limited by the availability of sunlight, nutrients and water. It is critical for long-term water and food security that a more holistic approach is followed to avoid unintended consequences.⁷

We need to manage water holistically at catchment scale to build both drought and flood resilience. This is critical to drought preparedness, and as such the document should refer to these principles. It should also identify opportunities to incorporate these principles across the water management and policy landscape – for example, the forthcoming Land Use Framework, and the evolution of the Environmental Land Management Scheme. How the Environment

⁵ For further detail, evidence and case studies, please see this 2023 briefing from Wildlife and Countryside Link: [WCL Briefing Building Resilience Floods Drought December 2023.pdf](#)

⁶ For examples, see [Drought data hub - Demonstrator | UK Centre for Ecology & Hydrology](#) and [Explore Data | Catchment Based Approach Data Hub](#)

⁷ For example, this systems-based approach was explored in the Interreg project ‘Water for Tomorrow’: <https://water-for-tomorrow.com/>

Agency engages with the influences these processes is an important part of drought management and preparedness, and should therefore be referenced.

Question 13. Do you have any specific concerns about local environmental drought impacts that you would like us to know about?

As discussed, environmental impacts – alongside agricultural impacts – are currently neglected in drought management, with largely reactive measures focused on managing the risk to public water supply. For example, Temporary Use Bans (TUBs) only being implemented once a PWS drought has been declared, or water saving comms being limited to hot, dry periods when environmental and agricultural impacts are already being felt.

The environmental impacts, risks and severity of drought are only increasing with climate change. Already 15% of rivers and 27% of all groundwater sources in England are over-abstracted, leading to unnaturally low flows that harm wildlife and increase the concentration of pollutants.⁸ Drought is catastrophic for aquatic animals and plants. The record-breaking 2022 summer heatwave, and the drought which started months before, saw abnormally low river flows, fish deaths, algal blooms, and some ponds and river stretches drying out entirely.^{9 10 11} Some parts of the country remained in drought over a year later.

Greater use of environmental monitoring before, during and after drought events is required. This should build upon the work of Natural England to develop site-based datasets to track drought impacts on wildlife including fish, and to identify and manage risks. Data and expertise from eNGOs who own and manage land could be incorporated into these monitoring efforts.

⁸ <https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water>

⁹ Wildlife and Countryside Link. (August 2022). '2022 water levels and river flow rates (England) in the context of the last 21 years'.

https://www.wcl.org.uk/docs/assets/uploads/WCL_Water_Level_River_Flow_2022_Briefing_August_2022.pdf

¹⁰ 'Environment Agency takes action to rescue fish during dry weather'. (August 2022).

<https://environmentagency.blog.gov.uk/2022/08/11/environment-agency-takes-action-to-rescue-fish-during-dry-weather/>

¹¹ 'Source of River Thames dries out 'for first time' during drought'. (August 2022).

<https://www.theguardian.com/environment/2022/aug/04/source-of-river-thames-dries-out-for-first-time-during-drought>

There could also be potential to harness citizen science to help monitor impacts during a drought. This would require planning and funding before a drought period.

Accordingly, there should be much greater use of catchment and nature-based solutions to build environmental resilience to water scarcity; this should be recognised as an integral part of drought management. Restoring freshwater systems and marine habitats such as rivers, wetlands, floodplains, salt marshes and peatlands to their natural state will enable them to retain more water. This will protect them and the wider landscape from drying out in times of drought and bring co-benefits including reduced flood risk during periods of heavy rainfall.¹²

Demand management solutions will further build both environmental and industry resilience, and should also be incorporated into holistic, long-term drought management. For example, implementing reforms to building regulations to increase water efficiency standards in new development, removing restrictions to universal water metering, and driving the water industry to reduce leakage.

Question 14. How engaged did you feel with the Environment Agency and other stakeholders during the last period of prolonged dry weather or drought?

Please choose one of the following:

Moderately

Why do you think this?

ENGO representation on the National Drought Group (NDG) is welcome; engagement via the NDG and the sub-groups, and meetings held post-Government press releases, have been helpful.

However, eNGOs still tend to find out about water company drought orders and permit applications at relatively short notice. Given the potential environmental implications of these measures, this is unhelpful and should be rectified.

¹² Wildlife and Countryside Link. (2023).

[WCL Briefing Building Resilience Floods Drought December 2023.pdf](#) & [WCL Briefing Nature Based Solutions Water December 2023.pdf](#)

Generally, more could be done in terms of engagement with all stakeholders outside of drought periods. For example, to raise awareness of risks and to identify actions that can be taken to avoid impacts in advance of a drought. This would help to build preparedness and resilience, as well as generally building awareness.

Blueprint for Water greatly appreciates proactive engagement with the Environment Agency, and the efforts taken by Agency colleagues to ensure this can happen in a meaningful way. However, this does not always occur. For example, environmental stakeholders were not made aware that a review was being conducted of the Environmental Destination, and had to request to participate in the consultation alongside water companies, the energy sector, and agricultural stakeholders.

This environmental stakeholder ‘gap’ is present elsewhere in water management, for example in the Rural Flood Resilience Partnership and the Flood Resilience Taskforce. Given the critical role of environmental resilience in sustainable water management, and that many eNGOs are landowners or managers working alongside farmers and rural communities to deliver both drought and flood resilience, this is a missed opportunity and should be rectified. We are grateful to now be represented on the Environmental Destination Review Advisory Group.

Question 15. How do you think the Environment Agency and others can better work together during prolonged dry weather and drought?

As raised in response to previous questions, the Environment Agency should not only work better together with stakeholders during prolonged dry weather and drought, but year-round in a more proactive, holistic approach to management. This would not only help to increase preparedness and reduce the impacts from drought events, but would also help to realise wider benefits such as increased flood resilience.¹³

This should include working more closely with eNGOs and land managers to improve environmental resilience, and to improve monitoring and understanding of risks and impacts. For example, through the site-based tracking approach being developed by Natural England. Working holistically with all stakeholders in this way will be critical given the lack of a single ‘trusted voice’ on drought, exacerbated by current public dissatisfaction and distrust with the

¹³ Further detail available in this Wildlife and Countryside Link briefing:
[WCL Briefing Building Resilience Floods Drought December 2023.pdf](#)

water companies. The Agency should also work more closely with stakeholders to increase awareness and education of the impacts of drought on the environment, and how human use of water can impact nature.

A more explicit connection is needed between drought management measures during dry spells, and what is expected of water companies outside of these drought periods. For example, expectations around leakage management. The water company leakage reduction route map provides a framework for companies to meet their commitment to triple the rate of leakage reduction by 2030 and halve leakage by 2050. The Environment Act target asks for a 37% reduction by 2038. We should be aiming to improve these targets because asking the public and businesses to use less during a drought becomes difficult (if not undeliverable) when the public know about the size of the water company leakage problem. 19% of all water put into supply during 2023/4 was lost to leakage. Water company leakage rates are a massive disincentive for people to consume less during drought.

Preparing and agreeing the drought communications plans in advance of drought, ready to be updated, will help ensure time to discuss and agree approaches. Joint press conferences would enable consistent messaging and efficiency of delivery.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 86 organisations to protect the natural world. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

For questions or further information please contact:

Ellie Ward, Senior Policy Officer, Wildlife and Countryside Link E: eleanor@wcl.org.uk

Wildlife & Countryside Link, Vox Studios, 1 – 45 Durham Street, Vauxhall, London, SE11 5JH
www.wcl.org.uk

This response is supported by the following organisations:

- Amphibian and Reptile Conservation Trust
- Angling Trust
- Freshwater Habitats Trust

- Friends of the Earth England
- Froglife
- Institute of Fisheries Management
- National Trust
- Paddle UK
- River Action
- RSPB
- Sustainability First
- The Rivers Trust
- The Wildlife Trusts
- Waterwise