

Harvey Bradshaw  
Executive Director Environment and Business  
Environment Agency

CC: Emma Phillimore  
Head of Water Resources and Water Demand  
Department for Environment, Food and Rural Affairs

*By email*

13<sup>th</sup> October 2022

Dear Harvey,

**Re: long-term actions for tackling drought**

Blueprint for Water<sup>1</sup>, as you know, are represented on the National Drought Group and its environmental sub-group. Blueprint members have been concerned by the impacts of this summer's drought and dry weather, which has affected the environment and agriculture more-so than public water supplies.

We welcome the consideration of short-term actions which can help to ease immediate pressure on the environment. We have been pleased to hear about the demand reduction figures seen by those water companies that have employed customer communications and Temporary Use Bans (TUBs). Further analysis of these findings would be instructive, particularly the impact of targeted communications by Severn Trent Water, who have reported reductions of 6% even without recourse to TUBs. **It will be important that these helpful communications are continued over the winter** and are coordinated and consistent. We know that, without this, customers are likely to be less careful with water at this time of year, but that it will remain important to limit demand, given that winter rainfall is predicted to be insufficient to restore river and reservoir levels to normal.

However, climate change is already making these events more frequent, more severe and more widespread. **Without systemic change we will find ourselves in these situations time and again**, continuing to seek actions that can help ease pressures once the effects of drought are already being felt. We want to see changes that would allow action to be taken sooner, and the worst impacts of drought to therefore be avoided.

**Key to this should be more effective use of TUBs.** Past views that consider the implementation of TUBs a 'failure' are outdated. Blueprint members view TUBs as a protective measure that, if

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<sup>1</sup> Blueprint for Water is part of [Wildlife and Countryside Link](#), a coalition of 66 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

implemented early enough, can provide significant protection to our water environment and to other water users. This could also potentially reduce the need to resort to Drought Permits and Orders, with their associated environmental risks. At the very least, we would expect to see companies employ TUBs first; without this, DPs and DOs should not be granted.

**Changes to Drought Plan guidance or legislation**, which allowed TUBs to be brought in based on wider benefits and not only on threat to water supplies, would be in keeping with the direction set by the National Framework, which recognizes the need for a multi-sector approach to securing the sustainable management of water resources. We suggested this change in [our response to the Drought Plan consultation of 2019](#). We hope that this is something you will consider the merits of, and share with Defra and its Ministers – our waters can no longer afford ‘business as usual’ when it comes to dealing with droughts.

We would be pleased to discuss any of these points further.

Many thanks, and best regards,



Ali Morse, Water Policy Manager, The Wildlife Trusts, Chair, Link Blueprint for Water Group



Mark Owen, Head of Fisheries, Angling Trust, Blueprint representative on the National Drought Group