Leep Networks (Water) Limited
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Copied to:
Environment Agency
Ofwat
CIWEM
Water Resources West (via website)
RYA (via website)

10 November 2026

Dear Martin

Leep Networks (Water) Ltd Draft Drought Plan 2027 Statement of Response

Leep Networks (Water) Ltd (LNWL) is a New Appointee operating wholly in England. LNWL has consulted on its draft drought plan for 2027 – 2032. The consultation started on 28th May 2026 and closed on 22nd July 2026.

Responses were received from:

- Environment Agency
- Ofwat
- Chartered Institute of Water & Environmental Management (CIWEM)
- Water Resources West
- Royal Yachting Association (RYA)

We provide below our response to those observations and also detail the changes made or proposed to our draft drought plan, a copy of which is attached.

This response will be published on our website and uploaded to the Company's Defra Sharepoint.

Yours sincerely,

Vicky Bell
Director of Regulations & Compliance

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Response to the Environment Agency

Area of issue	Issue and evidence	Implications	LNWL response
R1.1 Direction 3(1)(d).	The company does not describe how it has tested its plan through different drought scenarios.	The plan is not compliant with the Drought Plan Direction 3(1)(d).	Leep operates entirely via bulk supply agreements and does not manage independent water resources, hence we consider the testing of various scenarios is focussed on understanding how the Drought Management team will ensure we mirror the bulk supplier's actions during any stage of a drought. The drought of 2026 has shown that we are able, with minimal notice, to inform customers of restrictions within various bulk suppliers' resource zones.
R1.2 Direction 3(1)(f) Missing steps for NEUBs implementation.	In Section 3.4, it appears the company has not stated any discussions it would need to have with regulators in preparing for implementing Non-Essential Use Bans (NEUBs).	The plan is not compliant with the Drought Plan Direction 3(1)(f).	We do not recognise Section 3.4. We have updated Section 7.3 to reflect the timescale for applying for an NEUB.
R1.3 Direction 3(1)(g)	The company does not describe the measures that will be used to monitor, prevent and mitigate any adverse effect on the environment resulting from the implementation of its	The plan is not compliant with the Drought Plan Direction 3(1)(g).	Leep is a bulk supply-only company and does not operate any abstraction or storage. Our drought actions are limited to demand reduction activities hence we believe this direction does not apply.

	drought management measures.		
R1.4 Direction 3(1)(h) – Clarify compensation arrangements	The company has not described the compensation payments that a water undertaker expects to make as a result of the implementation of a drought management measure included in the plan. In particular, in relation to Schedule 9 of the Water Resources Act 1991.	The plan is not compliant with the Drought Plan Direction 3(1)(h).	Schedule 9 of the Water Resources Act 1991 specifically relates to compensation payable for damage or loss caused by the application of the terms of an ordinary Drought Order, such as entry onto or occupation of land and restrictions on abstraction or discharge. Leep is a bulk supply-only company and does not operate any abstraction or storage. Our drought actions are limited to demand reduction activities hence we believe Schedule 9 will not apply. We have, however, added a statement to Section 3 of the Plan clarifying the level of compensation payable for the interruption to supplies resulting from a bulk supplier's Drought Order.
R1.5 Direction 3(1)(i)	There is no mention of a yearly review of the company's drought plan or a commitment to testing the drought plan during a non-drought year	The plan is not compliant with the Drought Plan Direction 3(1)(i). A yearly test and review of the drought plan ensures that it is up-to-date and ready to be implemented during a drought.	We have added text to Section 12 of the Plan committing to an annual review and completion of the health check.

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R1.6 Direction 3(1)(j)	The company plan appears to incorrectly report the Levels of Service (LOS) for a number of incumbent water companies. The LOS do not appear to align with: Essex and Suffolk Water, Southern Water, Bristol Water, Yorkshire Water, Affinity Water, South Staffs Water and South East Water. There is also no mention of the regional group(s) within the plan.	The plan is not compliant with the Drought Plan Direction 3(1)(j).	We have reviewed the draft drought plans and water resource plans for all our bulk suppliers and revised our levels of service to match those proposed and will do so again before final publication to account for any changes in the incumbents' plans. An exception is Southern Water as their resource plan is not finalised. Following a meeting with Southern, we were advised by them to use the levels of service applicable for their current drought plan. We have added some comments on the role of regional groups to the plan in Section 13.
R1.7 Direction 3(1)(k)	It's not clear that the company has an emergency plan for drought which means it is not clear if it aligns with Security and Emergency Measures Direction 2022 (SEMD). The company hasn't explained in its drought plan what an emergency plan for drought covers and how it fits with its drought plan. There is also not clear what the trigger is for its emergency drought plan.	The plan is not compliant with the Drought Plan Direction 3(1)(k)	We do not currently have an approved separate Emergency Drought Plan. A letter from Emma Hardy, MP, on 2nd April directed companies to "review, update and, where necessary, develop level 4 drought plans". We are, accordingly, drafting our EDP for submission to Defra by 19th December. As for all other drought actions by LNWL, the Emergency Plan will be triggered by the actions of the relevant bulk supply company.
Unclear scale of drought actions	Because you are a national NAV, you cannot declare a single	Clarify that actions are isolated to the specific variation	As a NAV, LNWL has always mirrored the bulk supplier's actions, which

(company vs. site level).	blanket drought across all sites if only the South East is dry.	site level based on regional conditions.	are themselves based on specific resource zones. As evidenced by the 2026 drought, we apply restrictions only in the areas identified by the incumbent. We have added a short note (section 1.4) to explain this.
No mention of enhanced leakage detection/repair as a demand action.	Because you cannot change supply, leakage control is your most powerful tool to protect the environment during a drought.	Commit to increased acoustic profiling and prioritizing active leakage control (ALC) targets during a drought.	LNWL, as with other NAVs, is highly sensitive to leakage / unaccounted for water. We operate an ongoing water balancing process, irrespective of drought or otherwise. We are continuing to develop a leakage identification system hosted on our website, which automatically alerts Operations if a leak is suspected. This same system integrates customer AMI data and highlights significant changes in usage to identify customer-side leakage.
No mention of utilising smart meter data to target high users or leaks.	The EA expects modern NAVs to leverage automated meter infrastructure (AMI) to drive demand down.	Detail how smart meter alarms will be used to spot continuous flows (customer-side leaks) during dry weather spells.	We have added Section 7.2 explaining our use of AMI and our existing policy regarding high consumption or leakage.
No mitigation details for firefighting water supply reductions.	Lowering network pressures to save water might inadvertently starve fire hydrants during an emergency.	Explicitly reference your statutory liaison duties under Part 5 of the Fire and Rescue Services Act 2004.	As a recipient of a bulk supply for all its sites, Leep will not unilaterally reduce pressure; rather, the bulk supplier may reduce pressure in its network and thus at a bulk supply point. Leep's

			duties under Section 40 of the Fire & Rescue Services Act 2004 will be to operate its network to ensure the maximum available supply in the event of an emergency. This may mean denying water to other users. We have added an additional clause 10.5 to explain this.
No targeted communications tailored for non-household (NHH) customers.	Commercial customers use water differently than homes; a generic flyer won't help a hospital or commercial unit save water.	Detail your targeted communication channel for non-households, highlighting your direct management of the NHS site.	Our NHH customers are predominantly small to medium sized enterprises and, with a few exceptions, their water use is of a domestic nature. We do not recognise the reference to "direct management of the NHS site" but we will develop, where practical, communications suitable for NHH customers or Retailers.
Missing Level 3b extreme demand actions (e.g., removing TUB exceptions).	Level 3b acts as the final buffer before devastating Level 4 emergency measures (like standpipes).	Add a Level 3b tier where you remove voluntary commercial or domestic exceptions to hosepipe bans.	We have noted the removal of discretionary residential exceptions in Section 7.4, though this is part of a Level 2 (TUB) action. Level 3 in our plan is the implementation of an NEUB and we have added a line referencing the possible removal of commercial exceptions and the introduction of pressure management.

Response to Ofwat

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Ofwat Analysis	Ofwat feedback	Response
Levels of Service – Alignment with incumbents	Leep Water should ensure that the LoS presented in its final drought plan align with those presented in its own WRMP24 as well as those in incumbent company WRMP24s, for the drought planning period.	We have reviewed the draft drought plans and water resource plans for all our bulk suppliers and revised our levels of service to match those proposed and will do so again before final publication to account for any changes in the incumbents' plans. An exception is Southern Water as their resource plan is not finalised. Following a meeting with Southern, we were advised by them to use the levels of service applicable for their current drought plan. Leep's LoS are inherently tied to and mirror those of the incumbent supplier.
Baseline planning drought severity	Leep should set out in its final plan how it will adjust or align its plan to it's incumbent's longer term changes to LoS such as the move to 1:500 year resilience.	We will conduct annual reviews of our plan and any changes to the LoS of the relevant bulk suppliers will be incorporated in a revised plan. We have added a short paragraph to Appendix 4 to clarify.
Drought triggers	In its final drought plan Leep Water should clearly set out and explain the triggers for its drought levels. It should also explicitly mention where it plans to rely on incumbent notifications to reach drought triggers	Our drought triggers are inherently aligned, in all cases, with those of our bulk suppliers. LNWL will not unilaterally impose restrictions but will mirror the incumbent on being informed of their intention to enact their own plans. We have added additional wording to Section 7 to clarify this point.
Drought actions	In its final drought plan Leep Water should set out its drought actions in further detail. This should include the expected benefit from these actions, clear triggers for each action, and the area level at which actions are planned to be implemented.	LNWL operates a wide variety of sites across England. Some sites are standard urban, but many are central city apartments. Not all appointed areas will necessarily be included in a specific drought action as it will depend upon the extent of the relevant bulk supplier's resource issues and the locations of the NAV appointments. This, coupled with the often incomplete construction and relatively small sample size makes assigning an evidenced Ml/d benefit difficult and, potentially, misleading. Further, we are required to impose restrictions whether or not a clear benefit exists. We have added text to our plan to explain the national position regarding savings on a percentage basis for a) a TUB and

		b) for an NEUB in Section 7.1. Level 4 restrictions are not considered.

Response to the Chartered Institute of Water and Environmental Management (CIWEM)

CIWEM's response to our draft drought plan specifically referenced their document "Policy Position Statement, Drought Management in the UK, 2025" and requested we particularly note their call for improvements on pages 4 & 5. We set out our response to those improvement that we, as a bulk supply-only NAV believe have relevance, in the following table:

Improvement	Detail	Response
(1) Planning & Strategy		
a) Rapid response to drought permits	Regulatory improvements to allow more agility in responding to drought by reducing the lead period in England and Wales required for drought permit / order applications (Scottish legislation already allows emergency powers to be used for short term licences to be applied for within a two-week lead time). The duration and severities of a drought should influence the extent and impact of the range of drought management measures available to manage it.	As a bulk supply-only NAV, we do not have any abstraction or storage facilities that might be the subject of a drought permit. However, our bulk contracts require us to mirror the restrictions of the relevant supplier, including applying an NEUB, which requires an application for a drought order. For NAVs, this process is far from clearcut and we would support a move towards both simplifying the overall process and, in particular, adopting a default position that a NAV was automatically deemed to have applied if its bulk supplier has done so.
b) Equity & transparency between water purposes	It is recognised that there are prioritisation decisions that need to be made as droughts become increasingly severe. This requires assessing conflicting needs – for instance between public water supply, the environment, and water for livestock, agriculture, and emergency services.	We provide public water supplies only. Our contribution to this improvement is primarily through ensuring we manage demand during drought to assist in maintaining resources.

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a) The continuation of comprehensive drought planning	All those with an interest in the water environment – water companies, government bodies, regulators, other abstractors and businesses that rely on water – should maintain drought contingency plans. These should be updated as circumstances dictate, even during a drought if planned actions turn out not to be the most effective solution, or as a new option comes to light.	We are required to mirror the actions of our bulk suppliers and as such we believe such contingency plans are best placed upstream of our sites.
c) Temporary use bans as necessary tools	Temporary bans on the use of water, mainly for garden watering purposes, should be seen as an important drought management tool, and not as a systemic failure. Water companies should not be penalised financially for appropriate use of these restrictions. However, water companies should take into account the significant cost of such restrictions on some users.	Agreed.
b) Demand management	Effective and innovative demand management options must be identified to postpone the need for more stringent drought measures (like drought permits and orders) and reduce the effect on the environment as far as possible.	Agreed.
(2) Communication		
a) Awareness for responsible consumption	There needs to be more education and awareness of the necessity to use water with care, even outside of drought periods, including an understanding of climate change and potential for	Agreed. We have refined and developed our drought communications to encourage consumer awareness of the value of water. We operate regular customer campaigns to “use water wisely”.

	increasingly dry and hot conditions.	
b) Clarity across time and stakeholders	Clear communications from the onset, during and after drought about the situation and how people and businesses can save water. Integrated and accessible communication between all those involved in and affected by droughts, to minimise conflict and encourage effective management.	Agreed. We have seen an improvement during the 2025 and 2026 drought events with regular updates and better coordination between NAVs and bulk suppliers. Our communications are generally tailored to closely follow the relevant bulk supplier's own.

Response to Water Resources West (WRW)

The response from WRW focussed on issues relevant to joint working within North West England, the Midlands and the cross-border catchments with Wales. Around 40% of our appointed areas as at November 2026 are within the catchments covered by WRW.

Role of Water Resources West in a drought

We have added additional notes in Section 13 of our plan to reference all the regional groups and, specifically, WRW's statement of intent, which we use as an example of the roles of these groups.

Code of Practice on Water Use Restrictions

We continue to support use of this Code as the basis on which companies' drought actions are determined.

Regionally Consistent Data and Assumptions

We assume you are referring to the bulk contract values we request from the incumbent for each site and we agree that consistency is important, not least to ensure that 'reserved volumes' are not excessive. The volume requested for any given site is based on an assumption of the average annual residential consumption per unit, plus any assessed non-household use. To this we must add an additional 'headroom' (typically 10%) to ensure we can meet the requirements of the Environment Agency in terms of sufficiency of supply. We do note that some incumbent suppliers calculate significantly more than we have assessed whereas others may challenge our request.

Given the growth in the NAV market, we believe that there is value in a national review of these assumptions as the additional reserved volume may be locally significant.

Consistent Drought Communications

We agree that consistency of messages and possible restrictions ensures clarity with consumers. We also note your reference to differences in hydrology and the possibility of varying catchment

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responses to drought. Our restrictions, where imposed, reflect those of the incumbent's relevant resource zone; although we operate across England, we do not apply actions on a national basis.

Response to the Royal Yachting Association (RYA)

The response from the RYA was a letter of a general nature to Defra, rather than individual companies, noting the omission from draft drought plans of recreational use of water bodies managed by water undertakers. The letter specifically referenced the statutory Instrument 2000 No. 477 The Water and Sewerage (Conservation, Access and Recreation) (Code of Practice) Order 2000.

As a licensed water & sewerage undertaker, LNWL is subject to the guidance within the Code of Practice. However, the company does not control any reservoirs or other resources. Our contribution to the management of such by our bulk suppliers is by following our drought plan to drive demand reduction.