Statement of Response

On 31st March 2021, we submitted our draft drought plan to the Secretary of State for Environment, Food and Rural Affairs. The plan had been updated in line with the latest guidance and to account for any changes since we published the last plan in 2019. On 10th May 2021, the Secretary of State confirmed that our draft drought plan could be published for public consultation. This public consultation ran for a period of eight weeks from 7th June to 2nd August inclusive. We then had seven weeks to produce our statement of response to any responses provided in the consultation, and to make any changes required to our draft drought plan.

On 7th June we published our draft drought plan and all associated appendices, on our website, and also emailed these documents directly to a multitude of key stakeholders. In addition, we also shared the documents with our Customer Panel, and sought feedback from our customers through our H2Online virtual platform.

This statement of response documents the feedback and comments that were submitted to the Secretary of state and how we have taken account of the comments in the draft drought plan document.

We received 9 formal representations, and 2 customer forum responses covering the following stakeholders/groups:

Environment Agency

Natural England

Historic England

Cam Valley Forum

Middle Level Commissioners IDB

Friends of Cherry Hinton Brook

Friends of the Cam

Cambridge Green Party

Consumer Council for Water

South Staffs Water Customer Panel

South Staffs customers via the H2Online forum

We would like to thanks all who have contributed to this process and helped us to develop this plan.

Alongside this Statement of Response, we have submitted a revised draft Drought Plan to the Secretary of State. As part of the process, the Secretary of State may direct us to modify the plan, or will provide approval for the final plan to be published. The Final Drought plan will then be issued to our stakeholders and published on our website.

Issue	Stakeholder & Feedback	Response	Change
	Consumer Council for Water		
1	**Comments on Non-Technical Summary** 2.2 In the section on 'What is a drought?' where it explains a medium duration drought, reference is made to a drought permit in the South Staffs summary but not the Cambridge Water summary. It would be helpful to explain what this is and its impact on customers.	We do not propose any drought permits in the Cambridge Water plan; therefore have excluded references to this to avoid confusion for customers.	none
2	**Comments on Non-Technical Summary** 2.3 There is reference to customer engagement carried out during 2017 for the current Water Resources Management Plan (WRMP). However, there is little evidence in the summary or other documents about the extent to which the company has engaged with its customers on its strategy for managing a drought. We want to see clear evidence of how customers' views and priorities are reflected in the plans.	Customers have been consulted as part of this process, and their comments have been incorporated into our revised plan, and non-technical summary. In addition, we are carrying out extensive customer engagement over the summer of 2021 and the drought plan has been a clear element of that, and will be followed by a deep dive into restrictions and drought actions in October. These results will then also be used to inform WRMPs in addition to future reviews of our drought plan.	none
3	**Comments on Non-Technical Summary** 2.4 The table informing about the actions to be taken at each drought trigger level is useful. However, we would like to see more detail in order to provide a clear and concise descriptor of each trigger level.	We have added some further detail to Table 1 within the document to reflect these comments and comments from the Environment Agency	Section 1 table 1
4	**Comments on Non-Technical Summary** 2.5 In the section on 'What activities are covered by a temporary use ban?' it would be helpful to add a short	In following the guidelines for developing the draft drought plan, we have streamlined the core plan to make it a tactical and operational document. As part of this, we have removed	None required

	paragraph, similar to that on page 12 of the summary, that adds context by explaining how much water is used by the average hosepipe.	some areas of detail to appendices and have moved some of the more customer facing information to the "Non-technical Summary" document, which is designed to provide a quick and easy to read and digest overview of the key points of our draft drought plan for our customers. Cambridge Water believe that this information sits best in this "Non-technical summary" rather than the drought plan as this detail forms part of our customer engagement and will feature in our communications plan messaging.	
5	**Comments on Non-Technical Summary** 2.6 The use of temporary use restrictions and the process is explained well and we welcome customers being encouraged to sign up to the company's Priority Service Register (PSR) so they receive the important support they need. However, there appears to be limited reference to Ordinary Drought Orders (NEUBs) or Emergency Drought Orders. We would like to see these clearly explained, along with the potential impact on consumers of these orders.	The NTS is aimed at our domestic customers and the restrictions that are most likely to impact them. Section 3.2 of the main plan provides explanation of these restrictions for non-household and commercial customers. In practice, if we are required to use an ordinary drought order or emergency drought order then consumers will generally be highly aware of the drought situation, and our communications will be reflecting this. Feedback from our customer challenge and focus groups suggested we maintain the NTS simple and relevant to domestic customers.	none
6	**Comments on Non-Technical Summary** 2.7 In the section on 'Keeping you informed' it states that the company will co-ordinate its communication with the Environment Agency, Water UK and other water companies. We would welcome CCW being added, with an explanation of our role, and how we will work with the company to ensure the delivery of clear messages to customers. This will provide consistency with the process set out in Appendix B 'Drought Management communication plans' and in parts of the plans.	Thank you for identifying this – we believe that it will indeed be beneficial to add in some additional detail to this section regarding CCW and how we will work together to communicate to our customers. This will provide further clarity and align with our "Drought Communications Plan" in Appendix B.	Appendix B

7	**Comments on the draft Drought Plans 2021** 3.1 Although there is reference to the incidents of dry/hot weather encountered since 2018, it is unclear that the lessons learned have been taken into account and reflected in the plans for each region. In addition, the COVID-19 pandemic has had a significant impact on water usage (per capita consumption). As this is likely to continue in the short to medium term, it is unclear if this has been factored into the plans. With the current dry weather combined with increased water demand, we want to see clear evidence of this in the plans.	The COVID-19 situation led to a general demand increase in 2020. During the first lockdown, there was a period of warm weather and we observed increased usage as a result of many more people being at home and enjoying their gardens as they were furloughed or schools were closed. Since lockdowns have eased, we have not seen a repeat of the demand profiles this summer that we saw in 2020, even when factoring in that most people are having "staycations" and less people are holidaying abroad. As restrictions have relaxed and schools are returning, we are seeing more "normal" (i.e. pre-2020) demand profiles. As part of our annual review of our Water Resources Management Plan (WRMP), we have assessed the impact of the additional demand in 2020/21 and any potential risks posed to supply as a result. Asa result, we have not included COVID-19 assumptions explicitly within the drought plan. However, South Staffs is undertaking industry wide research to understand the continuing impacts of COVID-19 and any potential impacts, and should we determine any information through that process that we believe would have a material impact on our drought management; we will update the plan at that time to reflect this.	none required
8	**Comments on the draft Drought Plans 2021** 3.4 Effective communications with all customers and stakeholders is an essential part of drought management. We are concerned that the customer and stakeholder plans have minimal reference to how the company is working with Retailers to ensure effective communication with business	We have undertaken a full update of our "Drought Communications Plan" following this feedback and that from other stakeholders regarding this element of the plan, and this can be found in Appendix B. There is also additional detail in the main plan.	Appendix B Section 3.2

	customers in order to deliver water efficiency and reduced demand during drought and communicate the impact of drought restrictions. We urge greater consideration of how the company will work with Retailers and their customers to deliver these important messages and ask that this is made clear in the plans.		
9	**Comments on the draft Drought Plans 2021** 3.5 Table 8 sets out the Communication Plan triggers. We suggest this table includes triggers for promoting PSR and communicating with those on the company's PSR. We acknowledge this is covered in Appendix B but it would be helpful to include it within the body of the plans too.	In the Cambridge plan the drought triggers are presented in table 5. We are very committed to promoting our PSR and supporting those customers on it. Due to the importance of this element of our communications, we have now updated table 5 to reflect the triggers relating to PSR.	Table 5
10	**Comments on the draft Drought Plans 2021** 3.6 With regards to communication plans, it would be helpful for the company to show examples of the campaign communications, as well as the type of messages, that customers can expect to see and receive. For example, a copy of the infographic showing what is covered under the temporary use ban. Some other companies have included this information within their plans, which we welcome.	We have updated our Drought Communications Plan, and included some examples of the customer infographics we share with customers.	Appendix B
11	**Comments on the draft Drought Plans 2021** 3.7 The South Staffs plan includes a commitment to ensure the company communicates the end of a drought to its customers. We ask that a similar statement is included in the Cambridge Plan. It is vital that this is clearly communicated and including this will ensure consistency with Appendix B.	We have amended the plan to include a comment on customer communications at the end of a drought, and revised our Communications Plan	Section 7.1 Appendix B
12	**Comments on the draft Drought Plans 2021** 3.8 Section 8.3 of the Cambridge Water draft plan refers to compensation arrangements for drought measures and states	We have amended the text in the plan, this is now in section 8.2 which has been revised	Section 8.2

	"…we may consider that compensation would be payable …" We suggest 'may' is changed to 'will'.		
13	**Comments on the Drought Management Communications Plan** 4.1 We welcome the early and regular direct personal contact with those on PSR. However, we would encourage additional early communication with customers to encourage those who meet the qualifying criteria to join PSR.	We undertake regular campaigns throughout the year to raise customer awareness of our Priority Services Register (PSR). We absolutely recognise that drought situations mean it is more important than ever to identify those who qualify for the PSR, and we have included the trigger points for raising awareness in Appendix B – Drought Communications Plan. We would look to start this communication as the earliest possible stage in our drought communications.	Appendix B
14	**Comments on the Drought Management Communications Plan** 4.2 We are concerned that the company's communication plans do not explicitly acknowledge Retailers as a key stakeholder. However, we note that 'commercial (retailers)' are listed as a customer in the table of audience. It is important that the role of Retailers, and how the company communicate with them, is made clear to ensure business customers are properly informed and advised of any water use restriction, and the support available to them in the event of restrictions.	We have undertaken a full update of our "Drought Communications Plan" following this feedback and that from other stakeholders regarding this element of the plan, and this can be found in Appendix B. We have also included additional text in section 8.3 of the main plan.	Section 8.3, Appendix B
15	**Comments on the pre draft Drought Plan consultation** 5.1 This appendix provides a useful summary of the responses to consultation from various stakeholders on the pre-draft Drought Plans. However, it would have been helpful to include a column that informed how the responses had been taken into account in developing the draft plans.	Thank you for the constructive build on our table. We agree that including the detail of how the responses were incorporated into the planning would make it clearer to see the links. We will endeavour to ensure that all future pre-consultations and consultations are developed in the same format as a statement of response to that it is clear how the feedback has been taken into account.	None applicable
	Environment Agency		
16	**Recommendation 1 - provide consistent information on bulk transfers with neighbouring companies.** *Issue 1.1 -Bulk Transfers*	We have amended section 3.3.2 of the plan to include a table of bulk supplies with neighbouring companies with details about these supplies. The table includes the information	Section 3.3.2

	The company has referred to a number of routine bulk transfers, but does not include sufficient information on the authorisations it has from other water companies to secure these measures. Inconsistencies between neighbouring water company plans and its draft plan could result in issues if each company is making different assumptions. This has the potential to affect customers' security of supply and the environment. The company must provide more detail in the plan to ensure clarity for each agreement and reassurance that transfers are reliable during drought and allow customers and stakeholders to clearly identify each bulk transfer agreement.	suggested. This has been produced in conjunction with neighbouring water companies to ensure that there is consistency in the information presented between drought plans. This includes: • Name of the donor/receiving company. • The volume for each agreement and/or the typical volumes and limitations of water transfer. • The limits to the amount of water it can transfer or receive. • Type of bulk supply and any triggers • Location • Any change to agreements will in drought conditions	
17	**Recommendation 2 – ensure the plan is tactical and operational.** The company has demonstrated that it has made improvements to the structure and simplified its drought plan following the guidelines. However, certain parts of the plan are lacking information, or are unclear and contain inconsistencies. The company should clearly set out the actions that it will take at each stage of a drought including an extreme event. By making these changes, the plan could become easier to follow so that customers and stakeholders can understand the decisions Cambridge Water makes in a drought. This will avoid confusion and delay in taking action that could risk security of supply	This recommendation is repeated for Improvement 1 and no evidence is provided in table 1 presented in Appendix 1: evidence report.	None – included elsewhere
18	**Improvement 1 - Ensure the plan is tactical and operational.** *Issue 1.1 An operational and tactical manual.*	We have added commentary on the actions we could take at each stage of a drought, including further information in Section 7 on actions at the end of a drought.	Section 7. Appendix B

	The company has demonstrated that it has made improvements to the structure and simplification of its drought plan following the guidelines. Some parts of the plan do not provide a clear narrative to follow or lack significant information, such as Section 7 in the main plan (end of a drought) and the communications plan (Appendix B). There are a number of inconsistencies between the main plan, its appendices, presentation of supply options and bulk supplies in other water company drought plans	Our Communications plan in Appendix B has been revised to include additional information and detail. As per recommendation 1 we have included a table of bulk supply information, and this is consistent with other company plans. Tables in the main plan and appendices have been revised and made consistent.	Section 3.3.2
19	**Improvement 2 – review and update drought testing to include peak demand and heat wave scenarios.** *Issue 2.1 – Testing the plan against peak demand and heat wave scenarios.* The draft plan does not include testing of drought triggers against issues of high demand, heat waves or outage. The period 2018-2019 saw hot summers with months of below average rainfall and 2020 saw a March-May period with hot sunny weather and well below average rainfall. As reported in the Annual Review 2019/20 the company experienced a number of unplanned outages and operational restrictions in the hot dry weather and peak demand of summer 2019. This resulted in a request to take more water than is allowed under an abstraction licence.	We have not experienced and problems in meeting peak demands during hot dry weather, although peaks in demand increasing and our ability to maintain supplies may depend on abstraction licences being renewed at existing quantities. Drought events and periodic high demands are managed differently. The former lasts over many months or years due to a shortage of rainfall and the latter is associated with shorter periods of high demands associated with heatwaves and/or short periods of dry weather in summer mainly attributed to additional outdoor water use such as gardening. The conditions of 2020 were unique with an early period of hot dry weather combined with the impacts of the Covid pandemic, but nonetheless were a temporary peak demand not related to drought. 2018-19 saw below average rainfall and hot dry weather, and we enhanced our communications with customers and stakeholders around water efficiency	Appendix C

		and the potential for water use impacting on the environment, similar to early drought plan actions. It would not be appropriate to test drought triggers or include examples of supply performance against these conditions in our drought plan as they are considered to be within the normal range of weather fluctuations, and covered by our water resources management plan. However, our environmental stress indicator stage recognises that there is a point where environmental stress may occur before water supplies are affected, and that there are actions we can take to minimise this impact, as occurred in 2018-19. In our response to the LEN on 24/08/2020 in the Annual Review, we outlined that unplanned outages experienced led to an imbalance in abstractions at individual sources in the overall catchment due to water quality and planned work overrunning. These were not related to hot dry weather or peak demands in 2019, our policy remains to minimise outages during peak periods to maintain SDB headroom. We have taken measures to address individual source abstraction imbalances due to unplanned outages throughout the year and not just during peak demand periods.	
20	**Improvement 3 – clarify the use and detail of drought triggers.** *Issue 3.1 – Triggers at the start of a drought.* Although Section 2.2 sets out a number of triggers and different levels of drought, the company does not clearly set out the trigger(s) to specify the start of a drought event.	The response refers to table 1.2, which does not exist, we assume this reference is table 1. We do not use a single specific trigger to define the start of a drought sequence, and moving from prolonged dry weather to 'actual drought'. Our drought trigger Level1 indicators	Table 1

	It is unclear when the company consider the situation has moved from prolonged dry weather to actual drought. The company does not clearly set out the triggers to specify the start of a drought event. The company should update its draft plan to clearly set out the triggers for the start of a drought and explain how and when the company will consider the situation to have moved from prolonged dry weather to actual drought	define a drought sequence that may impact water resources over time commencing when a cumulative rainfall deficit of 55mm is reached, following the a period of below average groundwater levels at indicator sites. The cumulative deficit is calculated once 3 indicator sites drop below average water levels. These drought indicators have long term reliable records incorporating the effect from the worst drought on record. Level 1 is also triggered by EA 'prolonged dry weather' status, and can be considered an emerging drought. We have added some clarification to the trigger level template provided to help explain this.	
21	**Improvement 3 – clarify the use and detail of drought triggers.** *Issue 3.2 – Environmental and other sector triggers.* There are some environmental actions linked set out in Table 1.2 within the draft plan. However, the company does not refer to the consideration of the use of environmental or alternative triggers, such as other sectors under stress. It is unclear how the company would identify an environmental drought, other sectors under stress and what opportunities it would take.	The response refers to table 1.2, which does not exist; we assume this reference is to table 1. We have updated table 1 to make the environmental stress indicators and triggers clearer. The indicators have been derived from our NEP /WINEP investigations into flow impacts on sensitive waterbodies in our area which are representative of when environmental stress may start to occur, and align with actions to manage abstractions and support flows which are not related to drought. We would be guided by the Environment Agency on impacts to other abstractor groups, through our regular consultation in emerging drought conditions arising through our regular monitoring of long term average rainfall, recharge deficits and groundwater levels regionally and locally. This is outline din our Communication Plan appendix	Table 1 Section 8.3

		We have added further information to the plan on arrangements for supporting other sectors during a drought, in section 8.3 Supporting Other Sectors.	
22	**Improvement 4 – explain the effectiveness and understanding of demand side drought actions.** *Issue 4.1 – Consideration of joint and regional demand actions.* The company plans to take an aligned approach to temporary use ban notices across the Water Resources East regional group. However, the company does not demonstrate how it work with other companies, water retailers and regional water resources groups to align its other actions to reduce demand. The company's plan does not include whether it is better to carry out its demand drought actions in a co-ordinated, aligned approach with other water companies and water retailers across Water Resources East or only within the company as a whole.	We will align demand actions with other water companies and regionally were this is an appropriate and effective approach. In practice, this is most relevant to more serious droughts that are impacting on a regional basis or in some instances more locally across neighbouring companies. As the approach will vary according to each drought and individual stakeholder's position, the framework for this approach is in our drought communications plan. We have undertaken a full update of our "Drought Communications Plan" following this feedback and that from other stakeholders regarding this element of the plan, and this can be found in Appendix B.	Appendix B
23	**Improvement 4 – explain the effectiveness and understanding of demand side drought actions.** *Issue 4.2 – Justification of demand actions.* The company has not included the information it needs to demonstrate and justify its demand actions along with how these fit in with its communication plan. Also see Issue 6.1.	We have considered all the 6 areas of demand side actions in the drought planning guidance and would implement these in a phased approach as recommended in The UWIR report on Drought and Demand (07/WR/02/2), which aligns closely with our Communications plan. We have revised and updated our Communications plan to make the sequencing of demand side actions more readily understandable.	Appendix B Section 3.2
24	**Improvement 4 – explain the effectiveness and understanding of demand side drought actions.** *Issue 4.3 – Communicating temporary restrictions.*	Note Appendix 4 does not exist. We have revised the text in Section 3.2.8 for clarification and updated Appendix B – Communications Plan with additional detail	Section 3.2.8 Appendix B

	Section 3.2.8 of the draft plan and Appendix 4 does not clearly set out how the company will communicate with NAVs, water retailers for business and interest groups about the introduction, phasing in and lifting of temporary restrictions. In addition, the company does not explain how it will keep this information up to date. Also see Issue 6.1.		
25	**Improvement 5 – provide the detail and sequencing of supply side drought actions.** *Issue 5.1 – Prioritisation of supply actions.* Although the company has assessed and prioritised its supply actions that have the least environmental impact, the presentation of the options is inconsistent. There are differences between Table 1 in the main plan and Table 2 in Appendix C, which make the prioritisation order unclear.	We have reviewed and updated table 1. In the main plan and table 2 in Appendix C to provide additional detail on the environmental stress triggers, and made these tables consistent.	Section 1.4 Table 2 Appendix C
26	**Improvement 5 – provide the detail and sequencing of supply side drought actions.** ***I****ssue 5.2 – Supplying others.* The company does not include actions that it could implement to support other sectors in a drought. The company does not set out if and how it will supply people, businesses and farms that rely on their own water sources for essential use such as drinking and watering livestock, should their own supplies fail. Also see Issue 3.2.	We have added further information to the plan on arrangements for supporting other sectors during a drought, in section 8.3 Supporting Other Sectors.	Section 8.3
27	**Improvement 5 – provide the detail and sequencing of supply side drought actions.** *Issue 5.2 (sic) – Impacts of drought actions on water to supply firefighting.*	We have added further information to the plan on other sectors, including arrangements for Fire and Rescue services in a drought, in section 8.3 Supporting Other Sectors.	Section 8.3

	The company does not provide information on how it will mitigate any reductions in supply for firefighting as a result of its actions as required by Part 5 of the 2004 Fire and Rescue Services Act.		
28	**Improvement 6 – update and add detail to the communications plan.** *Issue 6.1 - Lack of clarity and detail in communications plan.* The company has provided clear messages and identifies its target audience including regulators, stakeholders, NAVS and other organisations. However, it has not included all the target audience in its communications plan table in (Appendix B) as it solely focusses on customers after Business as usual (above drought level 1). The communications plan should be updated to ensure all the relevant stakeholders are included in the rest of the table. The communications plan lacks significant detail and information. There are several generics statements which do not provide the specific detail of how the company complies with the Section 5 (specifically the 17 bullet points) of the Water Company Drought Plan guidelines 2020.	We have undertaken a full update of our "Drought Communications Plan" following this feedback and that from other stakeholders regarding this element of the plan, and this can be found in Appendix B.	Appendix B
29	**Improvement 7 – clarify the drought management actions at the end of a drought.** *Issue 7.1 – Process for stopping drought management actions.* Section 7 of the plan describes some indicators and triggers to define the end of a drought and states that drought actions would be ended progressively. However, there is no clear process for ending the company's drought management actions	Note there is no Appendix 3. We have revised section 7.1 of the plan to provide clarity on the approach to ending drought management options. The worked examples of drought sequences in Appendix C are not intended to show defined triggers for the end of drought which are effectively reversed, but applied with the discretion of the drought management team	Section 7.1

	and the company has not included the actions in its worked examples in Appendix 3.		
30	**Minor issue 1 - Environmental or alternative triggers.** There are some environmental actions set out in Table 1.2 in the draft plan. However, the company does not refer to the consideration of the use of environmental or alternative triggers, such as other sectors under stress. It is unclear how the company would identify an environmental drought, other sectors under stress and what opportunities it would take. Low groundwater levels can have an impact on the environment and agricultural sector, which typically occur before supply deficits. Limiting the risk to the environment in impacted chalk catchments, during a drought, is a priority for local abstractors and environmental groups.	Our drought triggers have been developed to include an environmental trigger with increased communication activities, and demand management actions, at an earlier stage that we would expect our supply system to be impacted. We have expanded this to make the actions and indicators clearer for the environmental stress trigger Our drought plan considers environmental stress and water supply impacts due to drought, but we are conscious that other sectors in a catchment are also affected. We would endeavour to support other sectors where possible. We would expect the EA to manage and where appropriate limit the environmental risk from other abstractors, and advise where we could assist through our regular liaison. We have added detail around supporting other sectors in section 8.3	Table 1 Section 8.3
31	**Minor issue 2 Drought exercise.** The company does not include plans for carrying out a drought exercise in non-drought years to test planned triggers and actions.	As per the guidance we have considered drought exercises to test our plan, but do not consider a formal approach to this is required. In practice we activate the earlier communications actions within our plan on a regular basis as a response to summer peak demands and other demand pressures. We have a fully tested and reviewed emergency plan and are involved in emergency exercises on a regular basis through the LRF. It would not be appropriate or necessary to test further actions within our drought plan outside of a drought situation.	None

32	**Issue 3 Best practice and international examples.** The company has not considered best practice and international examples.	We have used the conclusions of the CCWater review of drought and resilience, and UKWIR report 07/WR/02/2 to inform our approach to measures, restrictions, and in our Communications Plan, which has been reviewed and updated.	Appendix B
33	**Issue 4 Changes to management structure.** The company does not include any changes to its management structure that may happen as a result of a worsening drought and the triggers for those changes.	We have deliberately not been prescriptive in outlining potential changes to the DMT structure. Figure 3 shows the structure that would be involved in drought management, the degree of involvement would depend on the severity of the drought and the particular circumstances, however board level, senior managers and technical staffs will be involved at all stages of a drought situation.	none
34	**Issue 5 CCW and UKWIR reports.** The company has not considered the conclusions of the Consumer Council for Water's report 'Understanding drought and resilience' as well as the findings of the UKWIR report 'Drought and demand: potential for improving the management of future drought' when developing its communications plan.	We have made a comprehensive update of our communications plan to address issues raised by CCW and the EA, this incorporates recommendations from the CCW report. We are undertaking further customer research for PR24, including issues relating to droughts and drought planning. We have reviewed the UKWIR report on drought and demand and this has informed our phased approach to demand management options, prioritising those that we can implement before restrictions on customers use. We have included a regionally consistent approach to the language used and types of activities restricted in a TUB. These are included in our revised communications plan	Appendix B
35	**Issue 6 Reference to peak demand figure 108Ml/d.** 108Ml/d is quoted in Table 1 of the main plan, it is unclear if this the same as quoted peak demand in WRMP19. We note	This is not a peak demand figure. This reference has been removed	None

	108 Ml/d is the Critical Period Deployable Output figure in WRMP14.		
36	**Issue 7 Section 3.3.3 Use of existing licenced headroom.** The company state that "the potential requirement for supply options of this magnitude would not be expected until at least 36 months following drought trigger Level 2." It is unclear, after 36 months, which drought trigger the company would be in.	After 36 months following Trigger Level 2, in a referenced drought scenario we would expect to be in Level 3, following application for NEUB. We have clarified this in the text.	Section 3.3.3
37	**Issue 8 UKWIR drought vulnerability framework.** The company has not undertaken a drought vulnerability assessment using the UKWIR drought vulnerability framework as part of its WRMP19.	We have assessed our drought vulnerability for WRMP19 including likely DO impact which is and included in our baseline DO. We will review drought vulnerability using the UKWIR framework for WRMP24	none
38	**Issue 9 Appendix C Drought triggers development and scenario testing.** Pg.2 It is unclear what the 6 Environment Agency observation boreholes are and which water company boreholes each of them relate to. Pg.3 The MORECS product is reaching the end of its product life (April 2022) and work will be needed to transition to a new product. Pg.3 Figure 1.1 is difficult to read due to the small text size and it is unclear what is meant by proposed observation boreholes. Pg.4 The method for calculating recharge deficit has not been explained. Pg.6 Reference to river flows in CAM, unclear if this is the River Cam and why it is the only river assessed and referenced. Pg.7 Figure 1.2 Reference to RD1, 2, 3, and 4 is unclear, we assume Recharge Deficit and that these are different to drought levels 1-4.	• The boreholes are TL55-005, TL44-293, TL44-427, TL44-234, TL45-017, TL55-144 respectively. • We have consulted with the MET office and any new product will include continuation of the data parameters in MORECS. • We have enlarged Figure 1.1. Proposed observation boreholes are operational BHs not presently used to monitor groundwater levels that we may use in future if required. • As set out in section 1.3, recharge deficit is calculated using MORECs weekly effective precipitation data, and the calculation commences when rest water levels at 3 or more drought indicator sites drop below average annual rest levels. • The river flows in the Cam are referenced as this is a key site for which the EA provide regular assessment of flows against benchmark conditions in the Water Situation report. Cambridge Water does not monitor flows in	Appendix C Table 2

	Pg.11 Reference to rainfall deficit indicator, should this be recharge deficit indicator.	main rivers. We have added reference to a further flow gauge in Table 2. • RD1-RD4 are recharge deficit indicator trigger levels within our drought management tool which inform drought trigger levels 1-4 • We have amended rainfall deficit to recharge deficit	
39	**Issue 10 Appendix E Environmental Assessment and Monitoring.** Pg.25 The Rhee Groundwater Support Scheme also supports Thriplow Peat Holes SSSI. The licences were renewed in 2018, the next review date is the 31st March 2024.	Noted. We will revise the wording of Appendix E when this is updated	Appendix E
40	**Issue 11 Appendix E1.** Pg.8 Little Wilbraham (033074): flow data from Feb 1993 to Dec 2014. Stage data from Feb 1993 to May 2015. Now a level only site (L33074). Fulbourn (033073) GS: flow data from Jan 1992 to present. Still operating as a flow site.	Noted. We will add additional information to Appendix E1 on review and update.	Appendix E1
41	**Issue 12 Appendix E3 Hobsons Brook EMP.** Pg.9 The company has not included monitoring of the Environment Agency Observation Borehole TL45/017, this is monitored as levels here act as a trigger for water company support at Nine Wells. Previous investigations have identified a correlation between groundwater level as measured in this borehole, and flow at the Nine Wells springs.	This is relevant to spring flows which feed into Hobsons Brook but not to flows in the brook. We have used this OBH as an indicator of environmental stress.	None
42	**Issue 13 Appendix E5 Millbridge Common Brook EMP.** Pg.6 The company has not considered the Environment Agency Observation Borehole TL25/002 at 520910, 250717. The borehole is dipped monthly by the Environment Agency and is not covered by superficial till. However it is located on the opposite side of the river to the abstraction borehole and	Noted. We would welcome the provision of this data to determine if beneficial to our proposed EMPs.	none

	therefore may not demonstrate the impact of increased abstraction.		
43	**Issue 14 Appendix E6 River Granta EMP.** Pg.5 The company has not referenced that the river was also dry at Stapleford Gauging Station in September 2019. Pg.13 The frequency/duration comments for Babraham and Linton Gauging Station are not applicable to continuous flow monitoring.	This would form part of the baseline data for monitoring, and does not need to be directly referenced in the EMP	none
	Historic England		
44	**General comments** 1. The vulnerability of some heritage assets (designated and non-designated) to drought, and the potential harm to, or loss of, significance as a result of changes to water catchment areas;	Our drought plan does not propose any measures or actions that would cause significant changes to water catchments, and therefore any potential harm to heritage assets. As the drought plan proposes the use of existing assets and operational practices, we would not look to undertake additional surveys for baseline information to those already completed during construction or during any refurbishment works. The suggested modelling and assessments would be appropriate for any future construction works or infrastructure that could impact the historic environment, and implemented at this time.	None
45	**General Comments** 2. The potential impact of water catchment and abstraction measures on heritage assets and their settings, including impacts on water-related or water dependent heritage assets;	Our drought plan does not propose any measures or actions that would cause significant changes to water catchments, and therefore any potential harm to heritage assets. As the drought plan proposes the use of existing assets and operational practices, we would not look to undertake additional surveys for baseline information to those already completed during construction or during any refurbishment works. The suggested modelling and assessments would be	None

		appropriate for any future construction works or infrastructure that could impact the historic environment, and implemented at this time.	
46	**General Comments** 3. The potential impact of changes in groundwater flows and chemistry on preserved organic and palaeoenvironmental remains: where ground water levels are lowered, this may result in the possible degradation of remains through de-watering;	Our drought plan and measures would not directly impact water flows and chemistry in any way that differs from water supply operation in place for many years, including a number of historic drought events.	none
47	**General Comments** 3. The potential impact of changes in groundwater flows and chemistry on preserved organic and palaeoenvironmental remains: where ground water levels are lowered, this may result in the possible degradation of remains through de-watering;	Our drought plan does not propose any measures or actions that would cause significant changes to groundwater level lowering over those that have been experienced historically and due to natural process or our normal operations.	None
48	**General Comments** 4. The potential impact of hydro-morphological adaptations on heritage assets: this can include the modification/removal of historic in-channel structures, such as weirs / coastal and estuarine features such as historic sea defences; as well as physical changes to rivers/the coastline with the potential to impact on archaeological and palaeoenvironmental remains;	Our drought plan does not propose any hydro-morphological changes – if we were to include any of these at or on potential heritage assets we would undertake appropriate assessments of the impact.	None
49	**General Comments** 5. The potential for unrecorded deeply buried and waterlogged archaeology within the 'natural' floodplain/estuarine/coastal deposit sequence;	This does not apply to our drought plan measures	None
50	**General Comments** 6. The opportunities for conserving and enhancing heritage assets as part of an integrated approach to water, this includes	There are no such opportunities arising from our drought plan measures at this time.	None

	sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes;		
51	**Specific comments on the Draft Drought Plan** Cambridge is experiencing a period of major expansion, with urban extensions and new settlements under-construction or planned. In the course of your operations, we trust that you will consult the historic environment records held at the County Council and seek the necessary advice from the relevant local authority conservation officers to ensure that impacts on heritage assets are avoided or, where this is not possible, mitigated.	As the drought plan proposes the use of existing assets and operational practices, we would not look to undertake additional surveys for baseline information to those already completed during construction or during any refurbishment works at this time. If our future supply plans identified through the WRMP process require construction of infrastructure we will consult the appropriate organisations with regard to heritage assets and archaeology.	None
52	**Specific comments on the Draft Drought Plan** P33 Section 6.1, para 3 We note reference to designated sites. These are natural environment sites. We also suggest that reference is made to designated and non-designated heritage assets that may also be vulnerable to the effects of drought, as outlined in our comments above.	The drought plan proposes the use of existing assets and operational practices therefore the assessment of 'designated sites' has been limited to habitats regulation sites which may be impacted by our abstraction operations. Our drought plan does not propose any measures or actions that would cause significant changes to groundwater levels or flows over those that have been experienced historically and due to natural process or our normal operations.	None
53	**Specific comments on the Draft Drought Plan** P34 Section 6.2, para 7 We note that you do not consider the actions in the plan would impact on cultural or heritage sites. Historic England disagrees with this statement – drought scenarios may well have impacts upon designated and non-designated heritage assets for the reasons outlined above, and actions to address drought may also have further implications for these assets. It is our view that this issue is not sufficiently explored in the Plan, nor in the	See comment above. We do not consider that the proposals in our drought plan would impact on cultural or heritage sites, and any impact would be those caused by drought conditions themselves. Our plans do not propose infrastructure developments, therefore we have not included cultural or heritage sites in our environmental assessment.	none

	accompanying Environmental Assessment. All heritage assets, both designated and undesignated, are vulnerable to being harmed by infrastructure developments. We are concerned about direct impacts (such as desiccation), as well as the indirect impacts (such as the construction of infrastructure to enhance storage capabilities and the impact this might have on heritage assets including archaeology).		
54	**Specific comments on the Draft Drought Plan** Buried archaeology is especially vulnerable, and specialist advice should be sought, as appropriate, in areas of known, or potential, archaeological significance. Buried waterlogged archaeology may be at particular risk in times of drought. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology in a drought scenario. Waterlogged deposits, such as peat have the potential to preserve organic remains that are relatively rare in the archaeological record. Further information is this regard is set out in our general comments above.	As the drought plan proposes the use of existing assets and operational practices and does not propose any measures or actions that would cause significant changes to water catchments, and therefore risk of any potential harm to heritage assets. Our drought plan does not propose any measures or actions that would cause significant changes to groundwater level lowering over those that have been experienced historically and due to natural process or our normal operations.	None
55	**Specific comments on the Appendix E Environmental Assessment Section 1.1, para 3** Again we note that you do not consider that the actions of this Plan would impact on cultural or heritage sites. Historic England disagrees with this statement for the reasons set out above. Your environmental assessment focuses almost entirely upon the natural environment and there is insufficient consideration of the historic environment.	The drought plan proposes the use of existing assets and operational practices therefore the assessment of 'designated sites' has been limited to habitats regulation sites which may be impacted by our abstraction operations. Our drought plan does not propose any measures or actions that would cause significant changes to groundwater levels or flows over those that have been experienced historically and due to natural process or our normal operations.	none

	We suggest that the assessment and the Plan itself is revisited to carefully consider the potential implications for the historic environment which are currently insufficiently taken into account.		
	Natural England		
56	**Summary of Natural England's Advice** The dDP has been partially considered under the Conservation of Habitats and Species 2017 Regulations as amended, known as a Habitats Regulations Assessment (HRA); The paragraphs in Section 1.4 of Appendix E, entitled 'Habitats Regulations Assessment', are extremely brief and lacking in detail. It is unclear whether a full HRA screening has been prepared and whether all relevant Habitats sites and likely significant effects have been considered; we note that our pre-consultation comments, in our letter dated 12 June 2020, do not appear to have been addressed in this dDP, although they are quoted on page 5 of Appendix A;	We have reviewed our HRA screening and commissioned a further independent HRA screening exercise which has expanded the area of assessment based on the advice provided. The screening exercise has considered potential impact of our drought plan options on the following sites; Breckland SAC, Breckland SPA, Devils Dyke SAC, Eversden and Wimpole Woods SAC, Portholme SAC. The revised HRA screening has concluded No likely significant effect, and that as a result progression to Stage 2 appropriate assessment is not required. We will update Appendix E to reflect these conclusions once a final report has been issued.	Appendix E
57	**Summary of Natural England's Advice** Based on the level of detail presented Natural England is currently unable to concur with the no likely significant effect conclusions of Appendix E: Environmental Assessment and Monitoring which states "We do not consider that our actions in this plan would impact on cultural or heritage sites, the spread of non-native species, water quality or biodiversity under the NERC Act 2006."	We have reviewed our HRA screening and commissioned a further independent HRA screening exercise which has expanded the area of assessment based on the advice provided. The revised HRA screening has concluded No likely significant effect. We will update Appendix E to reflect these conclusions once a final report has been issued.	Appendix E

58	**Summary of Natural England's Advice** A HRA will need to be prepared to address the issues, inconsistencies and further information requirements set out in Annex 1 to this letter;	We will include our revised HRA screening report in Appendix E, this will address the advice provided in Annex 1	Appendix E
59	**Summary of Natural England's Advice** The dDP has been partially considered under the UK legislation by The Environmental Assessment of Plans and Programmes Regulations 2004 SI No.1633 (Strategic Environmental Assessment (SEA) process);	As a result of the conclusions of our revised HRA screening and assessment of no likely significant effects, there has been no requirement to further assess the plan for SEA. See also comments below for responses #60 #68.	Appendix E
60	**Summary of Natural England's Advice** Natural England does not agree with the conclusion that an SEA is not required in respect of this drought plan. The reasons for this are set out in Annex 1;	There has been no requirement to further assess the plan for SEA, as per the response #68 below to the comments in Annex 1, 1.2 Strategic Environmental Assessment (SEA)	None
61	**Summary of Natural England's Advice** A thorough SEA screening must be undertaken before publishing the final plan;	Not required – see comments above	none
62	**Summary of Natural England's Advice** The dDP has mostly selected options with the least/ lesser environmental impacts in preference to those with greater impacts; however, there are some inconsistencies between the presentation of these actions as set out in Annex 1.	We have revised Table 1 and Table 2 in Appendix C to address the inconsistencies, as the Environment Agency's recommendations. There has been no requirement to further assess the plan for SEA, as per the response #68 below to the comments in Annex 1, 1.2 Strategic Environmental Assessment (SEA)	Table 1 Appendix C
63	**Summary of Natural England's Advice** The dDP contains options that potentially affect designated sites and/or habitats of principal importance for the conservation of biodiversity. These potential impacts on	We have reviewed our HRA screening and commissioned a further independent HRA screening exercise which has expanded the area of assessment based on the advice	Appendix E

	important environmental receptors have not been adequately assessed. The details are set out in Annex 1.	provided. The revised HRA screening has concluded No likely significant effect. Also see response #68.	
64	**Summary of Natural England's Advice** The dDP has not been assessed for the potential for net gain in biodiversity. The dDP is not likely to result in a net gain in biodiversity;	There is no potential for biodiversity net gain from measures included in our drought plan, as the plan proposes the use of existing assets and operational practices.	
65	**Summary of Natural England's Advice** The natural and social capital of the dDP options has not been assessed. The dDP is not likely to result in enhanced natural capital;	There is no potential for enhancing natural capital from measures included in our drought plan, as the plan proposes the use of existing assets and operational practices.	
66	**Summary of Natural England's Advice** The identified deficiencies in the SEA content and process should be addressed before the final plan is published.	See response #68 below	
67	**Summary of Natural England's Advice** Natural England advise that an updated HRA is undertaken and submitted before publishing the final plan that the EARS are updated to reflect the mitigation requirements of recent caselaw.	We have reviewed our HRA screening and commissioned a further independent HRA screening exercise which has expanded the area of assessment based on the advice provided. The revised HRA screening has concluded No likely significant effect	
	Habitats Regulations Assessment (HRA) The HRA 'screening' set out in section 1.4 of Appendix E: Environmental Assessment and Monitoring is extremely brief. In our opinion this lacks sufficient detail, and consideration of available and emerging evidence, to enable a satisfactory no likely significant effect conclusion.	We have reviewed our HRA screening and commissioned a further independent HRA screening exercise which has expanded the area of assessment based on the advice provided. The revised HRA screening has concluded No likely significant effect, and that as a result progression to Stage 2 appropriate assessment is not required. We will update Appendix E to reflect these conclusions once a final report has been issued.	Appendix E

68	**1.2 Strategic Environmental Assessment (SEA)** The requirement for SEA is considered in section 1.5 of Appendix E: *Environmental Assessment and Monitoring*. This indicates that having followed published guidance, including the decision tree in Figure 4 (based on the UKWIR report) it is the Company's conclusion that a Strategic Environmental Assessment (SEA) is not required in respect of this drought plan. This is based on the *no likely significant effect* conclusion of the HRA and Cambridge Water's understanding that the drought plan does not set the framework for future development. Natural England disagrees with this conclusion for the following reasons: • We are currently unable to support the *no likely significant effect* conclusion of the HRA, for the reasons set out above; • Advice in section 2.2 of Annex 2 to this letter indicates that drought plans do set the framework for future development consents through drought permits and orders; in these situations reg.5(1) automatically requires an environmental assessment (pursuant to Part 3 of the 2004 Regulations). • Table 4 (Actions assessed for extreme drought) identifies a number of significant environmental impacts from supply side drought actions including drought orders and permits that are currently not, but should be, considered in this dDP.	As a result of the conclusions of our revised HRA screening and assessment of no likely significant effects, the drought plan does not requires an assessment under Article 6 or 7 of the Habitats Directive (Article 3.2(b)) Our drought plan does not set the framework for future development consents through drought permits and orders with respect to Regulation.5(1) Part 3 of the Strategic Environmental Assessment or SEA Directive, (art.3.2(a) and Art 3.4) including those as set out in Annexes I and II to the EIA Directive. Although groundwater abstraction is one of the projects listed in Annex II of the EIA Directive (2011/92/EU) ("the EIA Directive") under '10. Infrastructure Projects', our plan does not propose projects requiring 'infrastructure' for groundwater abstractions, as the abstractions included in our plan are from existing already developed resources. Therefore SEA according to regulation 5(1) of the 2004 Regulations is not an automatic requirement Actions assessed for extreme drought in Table 4 of the drought plan are not measures proposed to be included in our drought plan, but additional options that may be considered before Level 4 or in future revisions of our drought. As per the Environment Agency drought planning guidance, a light touch assessment of impacts is appropriate, which is included in table 4. Outside of the drought plan we have undertaken some further initial assessment of potential extreme drought options that would require drought permits. The need for these options would only be considered once in Trigger Level 3 at which time more	Appendix E

		detailed assessment would be undertaken as appropriate for any options under consideration. We would be pleased to share this with Natural England on request. Options that have the least impact on customers and the environment would be preferentially selected. Accordingly, there has been no requirement to further assess the plan for SEA.	
69	**1.3 Water Framework Directive Assessment** Comments on WFD are a matter for the Environment Agency however Natural England has provided some guidance in section 2.3 of Annex 2.	See comments below	
70	**1.4 Draft Drought Plan 2021** Cambridge Water have not undertaken sufficient level of HRA or SEA of the dDP, consequently the specific (positive & negative) impacts of the proposed options on European Sites, SSSIs, priority habitats and species & biodiversity have not been adequately identified, monitored or mitigated. Section 7.1 *Identifying the end of a drought* states: *"We recognise that this may not align with the Environment Agency declaration of a drought in all instances, or a prolonged period of dry weather for environmental drought. But we would expect to liaise closely with the Environment Agency and align with the regional situation as far as is practical".* Natural England has concerns that this approach could result in extending the period of environmental impact and delay recovery following a drought. This risk should be fully assessed with appropriate mitigation measures identified.	See previous comments on HRA and SEA screening and assessment of the drought plan. We have added further information in Section 7 on actions at the end of a drought. Section 7.2 on post drought actions is supported by the monitoring and mitigation proposals in our Environmental monitoring plans, which are applied as per the drought triggers when a drought situation may t require supply options to be considered.	Section 7.1

	Section 7.2 *Post-drought actions* – Natural England welcomes the post drought review; however, this will only be effective if there is greater clarity on the impact of drought actions and mitigation and monitoring measures. It is therefore vital the information gaps around these aspects of the current drought plan are fully resolved in the final Drought Plan.		
71	**1.4.1 Order of options and levels of service** Whilst supply actions have been assessed and prioritised in accordance with least environmental impact, there are some inconsistencies in the presentation of the options, within Table 1 in the Plan and Table 2 in Appendix C. These inconsistencies need to be addressed to minimise risk to the environment. Further advice on the order of options and levels of service is provided in Annex 2. Natural England advises that HRA, SEA and EARS should be undertaken to support the ordering of options in the dDP and thus ensure no adverse impact to the natural environment including designated sites. These assessments will also ensure that the plan is 'permit ready' and that Drought Permits or Orders can be authorised in accordance with the relevant legislation should they be needed.	We have revised Table 1 and Table 2 in Appendix C to address the inconsistencies, as the Environment Agency's recommendations. We have reviewed our HRA screening and commissioned a further independent HRA screening exercise which has expanded the area of assessment based on the advice provided. The revised HRA screening has concluded No likely significant effect. There has been no requirement to further assess the plan for SEA, as per the response #68 below to the comments in Annex 1, 1.2 Strategic Environmental Assessment (SEA). Our drought plan does not propose the use of drought permits. The use of ordinary drought orders only applies to non-essential use bans, as per the Water resources Act 1991 legislation (section 74(2)(b). we do not propose to use any other provisions within section 74 that may have an impact on the environment, hence no environmental assessment of drought orders is required. We have amended the plan for clarification.	Appendix C Section 3.2.10 Table 1 Appendix E
72	**1.4.2 Natural capital and resilient landscapes and seas**	It is unlikely that any sites would be adversely impacted by our supply side options as these are limited to existing	None

	The Plan does not seek to improve / prevent decline in natural capital or address resilience. Natural England recognises that the ability to enhance Natural Capital and promote options that deliver significant ecosystem services is limited in the drought planning process (compared to the draft Water Resources Management Plan or business planning process for example). However, the dDP should attempt to calculate, improve or prevent the deterioration of natural capital of any sites adversely impacted by the proposed supply side options through the SEA and EARS, and attempt to improve the resilience of sites which will be impacted by the implementation of the supply side options. Natural England advises that measures should be included within the dDP to improve the (drought) resilience of sites that will be adversely affected by the supply side options included in the dDP.	abstractions. However our environmental monitoring plans would address any potential impacts from changes in abstraction and include mitigation that would improve resilience to future droughts if applicable	
73	**1.4.3 Connecting people with nature – demand management** Natural England generally supports the demand-side options identified in the Plan including extra promotion of water efficiency and demand management, leakage reduction, appeals for restraint and temporary use bans (TUBs). We believe that pre-drought engagement with local communities is essential for improving the public's understanding of the value of water. Educating local communities on the environmental severity of drought and the significant impact their actions can have on the environment is critical for ensuring a positive response to voluntary measures. The increased understanding of the origin and environmental cost of water will also provide a strong grounding for a positive	We have an established programme of communications on the importance of water saving and the environment, through social media, advertising and other direct customer contact. This is increased early on in a drought, in response to environmental stress and other drought impact. We have updated our Communications Plan in which we describe the communications channels we use. These are extensive and advertising of restrictions would not restricted to the minimum requirements in the legislation. Our aim is to reach as many customers as we are able to with communication means available to us, on a proactive basis. We have reviewed and update our Communications plan with further detail.	Appendix B

	public response to the implementation of TUBs, significantly reducing the perceived negative personal impact. The communication plan (Appendix B) could provide additional detail to evidence measures which will pro-actively reduce customer demand for water during periods of drought. The plan should include a clear strategy for improving its customer's awareness of the environmental impacts of drought in relation to water consumption, this limits the potential savings from the voluntary demand management measures. We recommend that pre-drought awareness work should be an integral part of the drought plan and we would encourage and support proactive engagement with local communities. The communication plan of pro-active measures to reduce demand during the pre-drought and dry weather periods should be improved to provide sufficient detail to demonstrate the effectiveness of the strategy.		
74	**2.1 Habitats Regulations Assessment and Duties to Habitats Sites** Regulation 9 of the Conservation of Habitats and Species Regulations 2017 (S.I. 2017/1012) as amended (referred to as the Habitats Regulations) requires every competent authority, in the exercise of any of its functions, to have regard to the requirements of the Habitats Directive. This requirement includes restoring favourable conservation status. Regulation 10 places a duty on a competent authority, in exercising any function, to use all reasonable endeavours to avoid any pollution or deterioration of habitats of wild birds. In addition, regulation 63 places obligations on competent authorities in respect of plans or projects likely to have a significant effect on a protected site. The Government guidance now refers to sites	Regulation 63- We have reviewed our HRA screening and commissioned a further independent HRA screening. The revised HRA screening has concluded No likely significant effect. Regulation 10 – Our proposed measures would not impact on habitats of wild birds.	Appendix E

	covered by the provisions of the Habitats Regulations as 'Habitats sites' in line with the wording in the National Planning Policy Framework and we have followed that nomenclature throughout this letter. Note that for Marine Protected Areas that are also Habitats sites and Ramsar sites the legal tests are the same as terrestrial/freshwater Habitats sites. In England, as a matter of policy, sites listed or proposed under the "*Ramsar Convention on Wetlands of International Importance*" receive the same level of protection as Habitats sites.		
75	**2.2 Strategic Environmental Assessment (SEA)** The European Commission Directive 2001/42/EC "*on the assessment of the effects of certain plans and programmes on the environment*" is known as the 'SEA Directive'. It requires "*an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment*" (EC, 2001; Article 1). The provision is explicitly applied to plans made for "water management". The Directive is enacted into UK legislation by The Environmental Assessment of Plans and Programmes Regulations 2004 SI No.1633. It is Natural England's position that environmental assessment is likely to be automatically required for drought plans in England, under reg.5(1) of the 2004 Regulations in most circumstances.	We have applied the approach in 'A Practical Guide to the Strategic Environmental Assessment, ODPM, 2005', and Strategic Environmental Assessment – Guidance for Water Resources Management Plans and Drought Plans (07/WR/02/5), UKWIR 2007 to determine the requirement for SEA. Under Regulation 5(1) our drought plan meets tests (2)(a) but does not meet test (2)(b) Under Regulation 5(1) our drought plan does not meet test (3) following updates to our HRA screening. Under Regulation 5(1) our drought plan meets tests (4)(a) but does not meet test (4)(b)- our drought plan does not set the framework for future development consents. Although groundwater abstraction is one of the projects listed in Annex II of the EIA Directive (2011/92/EU) ("the EIA Directive") under '10. Infrastructure Projects', our plan does not propose projects requiring 'infrastructure' for	Appendix E

		groundwater abstractions, as the abstractions included in our plan are from existing already developed resources. Under Regulation 5(1) our drought plan does not meet test (4)(c) following updates to our HRA screening. Accordingly our drought plan does not automatically require SEA under Regulation 5(1) of The Environmental Assessment of Plans and Programmes Regulations 2004	
76	**2.2.1 Wildlife and Countryside Act 1981 as Amended** Section 28G of the Wildlife and Countryside Act 1981, as inserted by section 75 of and Schedule 9 to the Countryside and Rights of Way Act 2000, places a duty on public authorities, including water companies, to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of SSSIs. These duties are mirrored in the general recreational and environmental duties placed on relevant undertakers in the Water Industry Act (1991) as amended. These duties not only apply to companies to remove their impacts but also to contribute to maintaining or achieving SSSI favourable condition. The Water Industry Strategic Environmental Requirements (WISER, page 29) sets out the expectations for delivery of these obligations. Companies are expected *"to contribute to maintaining or achieving SSSI favourable condition both on [companies'] own land and in the catchments [companies] manage or impact on".*	We have assessed the impact of our operations on SSSIs through the EA National Environment Programme (NEP), and where necessary put in place solutions to ensure we do not have any impact that compromises the conservation of designated sites. Our drought monitoring plans indicate where monitoring might be reinstated to support tehse objectives	none
77	**2.2.2 Natural Environment and Rural Communities Act and Net Gain**	We have due regard to the NERC Act in our operations, and no priority species or habitats would be directly impacted by our drought plan measures as the plan proposes the use of	none

	Under Section 40 of the Natural Environment and Rural Communities Act 2006, every public authority, including water companies, must in the exercise of its functions have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity in this context includes restoring or enhancing a population or habitat. Section 41 of the same act requires a list of habitats and species that are of principal importance for the purpose of conserving biodiversity (to which Section 40 duty applies) to be published. This list is referred to as Section 41 or priority habitats and species list.	existing assets and operational practices. Our environmental monitoring plans are designed to ensure we monitor and mitigate and potential impact from our supply side options on habitats and species.	
78	**2.2.3 Protected landscapes** Relevant Authorities (including water companies as a Statutory Undertaker) are to have regard to the purposes of National Parks (Section 11A (2) of the 1949 Act) and the similar duties towards Areas of Outstanding Natural Beauty (AONBs) (Section 85 of the Countryside and Rights of Way Act 2000) and the Broads (Section 17A of the Norfolk and Suffolk Broads Act 1988). Duties to further the natural beauty and rural amenity are also included within the general recreational and environmental duties placed on relevant undertakers in the Water Industry Act (1991) (as amended). Protected landscapes are central to the delivery of aspirations in the Defra 25 Year Environment Plan to enhance the beauty, heritage and engagement with the natural environment. In addition there are requirements to consider protected landscapes in national planning policies.	There are no protected landscapes within our area of supply or impacted by our drought plan measures	none
79	**2.2.4 Climate change** The Climate Change Act 2008 sets the legal framework for adaptation policy in the UK, preparing for the likely impacts of	Climate change is considered in our WRMP19, to be revised by WRMP24 in 2022. We have also published our Climate Change Adaptation Report and subsequent updates for	none

	climate change. The 2nd Climate Change Risk Assessment (2017) identifies risks to water supply and natural capital, including coastal communities, marine and freshwater ecosystems and biodiversity, as among the highest future risks for the UK relevant to the water industry. The Defra 25 Year Environment Plan aspires to "*take all possible action to mitigate climate change, while adapting to reduce its impact".* WISER (page 54) *states "a priority for all should be to work together to build an evidence-based understanding of the likely effects of climate change and identifying and implementing low carbon solutions that address any negative environmental impacts that may arise"*. The National Planning Policy Framework paragraph 149 states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.	Defra's adaption reporting under the Climate Change Act. Our adaptation report identifies measures to adapt to current and future predicted impacts of climate change on our operations.	
80	**2.2.5 Protected species** Natural England Standing Advice for Protected Species is available on our website to help local planning authorities and others including water companies better understand the impact of their operations and development on protected or priority species should they be identified as an issue at particular developments or plans. This also sets out when, following receipt of survey information, the authority (or the undertaker in regards of the exercise of permitted development rights) should undertake further consultation with Natural England.	We have due regard to protected species in our operations, and our plan proposes the use of existing assets and operational practices. Our environmental monitoring plans are designed to ensure we monitor and mitigate and potential impact from our supply side options on habitats and species. We would consult NE and follow advice when required following receipt of relevant survey information	none
81	**2.2.6 Marine Conservation Zones**	Not applicable to Cambridge water	none

	Section 125 of the Marine and Coastal Access Act (MCAA) (2009) applies a general duty to public authorities to exercise their functions in a way that best furthers the conservation objectives of a Marine Conservation Zone (MCZ) or, where that is not possible, least hinders them. There is also an obligation to notify Natural England where a public authority's function might significantly hinder the MCZ's conservation objectives or significantly affect an MCZ. The relevant public authorities must take account of this duty in the assessment of the water company statutory plans including Drought Plans and Water Resource Management Plans.		
82	**2.3 Water Framework Directive** The Water Framework Directive7 sets specific objectives for the protection of the water environment which include for surface water bodies the prevention of deterioration and achievement of good ecological status/potential. For groundwater bodies the objectives are to prevent deterioration and achieve good chemical and quantitative status.	Our drought plan environmental assessments include an assessment of Deterioration risk under the water framework Directive	none
83	**2.4.1 Order of Drought Options and Levels of Service** The prioritisation of drought options use should take account of impact on the environment and should be ordered with the least potentially harmful options selected before those with potential environmental impacts. Where there is a choice, option with lesser environmental impacts are selected first in the plan but based on the identified impacts. The Environment Agency's Water Resource Planning Guideline (WRPG) describes levels of resilience that water company draft Drought Plans need to work to. The point of service failure is defined as "*implementing exceptional demand restrictions on customers, associated with emergency drought orders, such as*	In accordance with the EA drought plan guidance, we have prioritised drought options so that demand saving options occur before any supply options. Demand measures have no discernible environmental impact, and the supply options that we propose have limited potential for environmental impact. Our levels of service for temporary use and non-essential use bans, are published in our WRMP19	none

	standpipes". The dDP should be planned so that the water company is resilient to a '1 in 500 year' level and the water company should aim to achieve this by 2039 at the latest. There is some flexibility on this deadline if the local costs of achieving this are exceptionally high when compared to the benefits. In relation to temporary use bans (TUBs), paragraph 4.7 of the WRPG states that water companies must set a "*planned level of service for other customer restrictions over the planning period*". The Drought Plan should illustrate the frequency that the water company plans to apply temporary use bans and non-essential use bans to household and non-household customers.		
84	**2.4.2 Environmental Assessment Reports (EARs) of drought permits and orders** The Environment Agency's (EA's)9 Water Company Drought Plan Guideline (paragraph 4.2.1) instructs a water company to "*carry out as much preparation work as possible in advance of a drought event" and* states that Drought Plans should show that the water company is "*application ready for [its] more frequent drought permit or order sites… This will include an environmental assessment for each permit and order*."	Our drought plan does not propose the use of drought permits. The use of ordinary drought orders only applies to non-essential use bans, as per the Water resources Act 1991 legislation (section 74(2)(b). we do not propose to use any other provisions within section 74 that may have an impact on the environment, hence no environmental assessment of drought orders is required. We have amended the plan for clarification.	Section 3.2.10
85	**2.4.3 Natural Capital and Resilient Landscapes and Seas** Defra's 25 Year Environment Plan encourages the growth in natural capital and measurement of ecosystem services. It states that "*over coming years the UK intends to use a 'natural capital' approach as a tool to help us make key choices and long-term decisions*."	Not applicable to the drought plan	none
86	**2.4.4 Connecting people with nature – demand management** Natural England's Conservation 21 seeks to drive a fundamental change in mind-set, to make a healthy natural environment a central part of health, wealth and prosperity. This includes	Our drought plan measures are such that we do not expect to need to interrupt customer supplies other than in very extreme, unprecedented circumstances due to drought or prolonged dry weather.	none

	encouraging the public to value the water they use. Defra's 25 Year Environment Plan aspires to reduce the risks of drought to the public by: • *Ensuring interruptions to water supplies are minimised during prolonged dry weather and drought.* • *Boosting the long-term resilience of our homes, businesses and infrastructure*.	We support the aspirations of the Defra 25 year plan through our commitment to supporting customers and new developments to be water efficient, this is separate to the drought plan.	
	Middle Level Commissioners IDB		
87	**(B) Local water resources** It is understood that the key sources of raw water that form Cambridge waters supply are not within our area of interest and should not detrimentally affect our day to day operations in the short term but in the longer terms it is considered that this position must be reviewed	We will continue to consult with IDB's on water resources planning and drought planning.	None required
88	**(C) Reduced carbon footprint** Improved water supply and sanitation, and better management of water resources, can boost economic growth and it is suggested that the use of smaller viable but local supply sources perhaps being supplied by gravity rather than being pumped, could also be used to reduce adverse carbon impacts	We review water supply options at least every 5 years in our WRMP, of varying scales. Smaller scale sources tend to pose operational cost, water quality and resilience issues, and will still normally require pumping. However any feasible options would be considered. We are also committed to the water industry target of net Zero Carbon by 2050	None
89	**(D) Long term resilience** Whilst it is being understood that major new water supply infrastructure is being planned for the Anglian region this may be several decades away and it will be appropriate for other more sustainable sources to be assessed in the near future	We are committed to ensuring resilient and secure water supplies over the long term, and include plans in our WRMP to address future demands for water, for both short, medium and long term periods. This will next be reviewed for WRMP24, during 2021-22	none

	There are many ways in which this risk can be alleviated, water efficiency and demand management, as detailed in item 3.2.1, leakage reductions, As detailed in item 3.2.2. are examples of this However, it is considered that growth and development in the future must consider the whole water cycle, giving serious consideration to providing potable water at source. The rainwater harvesting at Eddington is an example of this. There are several large developments currently being built out or planned within the Cambridge water area of supply, for example Northstowe, Cambourne, Waterbeach, Bourn etc, which in order to meet current local and national guidance, will need to provide large water attenuation features. It is suggested that the principles learned at Eddington could also be applied to these? Are these missed opportunities? It is appreciated that these may not be financially viable for either the developer or the water company involved.	Demand management is critical to both our long term plans for meeting demands, as well as being important in drought situations. We also support water recycling, re-use and localised solutions to support the sustainable delivery of growth and development in our area. We were pleased implement water recycling at Eddington in partnership with the university, and remain open to similar proposals for other developments. To be effective this does require engagement with developers and planners at the outset of development plans and masterplans and we encourage this to be explored, and work with major developers wherever possible - however as you note, there are potential cost implications for those involved. These types of solutions will feature in our WRMP24 evaluations of feasible options	
90	**(E) Communicating with the customer** The various references to communication are noted but it is considered that all water companies need to undertake more efficient communication with its customer's stakeholders and members of the public. Better and more efficient communication may be a benefit that arises from involvement with the WRE	We have an established programme of communications on the importance of water saving and the environment, through social media, advertising and other direct customer contact. This is increased early on in a drought, in response to environmental stress and other drought impact. We have updated our Communications Plan in which we describe the communications channels we use. These are extensive and advertising of restrictions would not be	Appendix B

	Item 3.2.8 refers to the advertising of restrictions and identifies that this should be advertised into local newspapers. Whilst it is appreciated that this is set out in current legislation this is considered to be old-fashioned and requires review. However it is noted that other additional methods of communication, including social media are being used, which will reach more customers but there is no guarantee that everyone will be aware or take any required action.	restricted to the minimum requirements in the legislation. Our aim is to reach as many customers as we are able to with communication means available to us, on a proactive basis. We have reviewed and update our Communications plan with further detail.	
91	**(F) Partnership working** The commissioners and associated boards are prepared to work in partnership with the local community private and public partners to fund and deliver water level and flood risk management and other relevant schemes where there is a mutual benefit to the partners concerned.	We would welcome any engagement and partnership working where this is applicable.	None required
	Cam Valley Forum		
92	**Taking account of environmental needs** 2. We are calling on Cambridge Water, Affinity Water and Anglian Water to work much more closely *together* to develop a *whole-catchment* approach to tackle the environmental impacts of over -abstraction from the Chalk aquifer in the Cam Valley. In 2019 the three companies abstracted some 105 Ml/day from the aquifer (Cambridge taking 64%, Affinity 22% and Anglian 14%). In that year the Environment Agency also abstracted a further 15 Ml/day from the aquifer to augment Chalk streams adversely impacted by these abstractions. The companies share a common resource yet lack a common approach; they need to collaborate in finding effective short-term and long-term solutions. These need to be brought together, within the	We are working closely with Anglian Water and Affinity Water at a local level and through our work with Water Resources East. The focus of this work is to identify short, mid and long-term options that could support each company in order to meet the increased demand of water predicted for our region and to enable further reductions to our existing chalk stream aquifer abstraction licences. These opportunities are being co-developed between the companies and will form a key part of both the individual company WRMPs and the regional plans. A key workstream within Water Resources East (WRE) is Environmental Destination – identifying what our regional	None

	regional planning framework provided by Water Resources East, and built into their individual Water Resources Management Plans.	ambition is for the environment and how quickly we want to achieve it. Cambridge Water's Head of Water Strategy is currently partially seconded into WRE to lead this workstream, working together with individuals from the other water companies and representatives from other sectors. This will ensure a consistent and joint approach to driving environmental improvements across our region.	
93	3. In our recent comments on Affinity Water's Draft Drought Management Plan we commended their references to the company's environmental responsibilities and the 81 specific references to 'Chalk'. Affinity Water made a welcome commitment on 27/09/20 to restore Chalk streams on the south slopes of the Chilterns (www.Cambridgewater.co.uk/news/action-to-restore-chalk-streams) and confirmed in correspondence with us on 16/10/20 that '*our commitment applies to all chalk rivers not just those in the Chilterns*.' We encourage Cambridge Water to reflect this commitment, and the company's global responsibility to care for and restore the Chalk streams affected by its activities, in all its policies, plans and relevant actions, including its Drought Management Plan	As part of our Water Resource Management Plan, we are reviewing our environmental destination and ambition. This will detail the steps we will take, over the next 25 years and beyond, to drive environmental improvements and enhancements. We are currently undertaking an extensive customer and stakeholder engagement programme to understand the views of our customers in this area to help us develop these plans. At Cambridge Water we are committed to ensuring the long term health of the environment within which we operate. We support local level improvements through our PEBBLE fund – a grant scheme where local groups and organisations can apply for funding to deliver biodiversity improvement projects. Over the last few years, we have supported projects on the River Mel, River Shep, Mill River and Vicar's Brook. We are part of Defra's Chalk Stream Restoration Group and are already undertaking detailed scoping work on the rivers in our region to identify some flagship projects we can promote through this. We have contributed to and are supportive of the CaBA Chalk Stream Restoration Strategy,	None

		are this will form a key thread through the Environmental Destination workstream at Water Resources East.	
94	4. Cambridge Water, in sharp contrast to Affinity Water, mentions 'Chalk' only once in its draft Plan. The inclusion of 'may' in '*We also acknowledge that not all existing abstractions are sustainable over the long term and **may** already impact river flows*' and '*we are investigating any abstractions that **may** impact the environment through the Water Industry National Environment Programme*' suggests a reluctance to acknowledge - or even institutional blindness to - the environmental problem. We urge Cambridge Water to build into its own plan the environmental understanding and commitment to change shown by Affinity Water. Cambridge Water needs to reset its thinking	We have revised the introductory text to include further reference to the issues our region faces, and the update to water stress status. Future planning for growth and addressing longer term environmental needs is undertaken through our WRMP's, and regional planning. We are committed and fully engaged in long term planning with WRMPs and regional planning to ensure these issues are addressed.	Introduction
95	5. The long-standing impacts of over-abstraction on Chalk streams in the Cam catchment are proven and increasingly recognised by public bodies (see Annex 1 for Cam examples). In the 'Achieving a Green Future' letter to water companies of 21/08/20, Defra and the regulators stated: 'Restoring England's internationally important chalk stream habitats is a government priority. Many suffer from low flows, poor water quality and habitat loss and we need your help to tackle these pressures.' The Government's draft Strategic Priorities for Ofwat of 22/07/21 include: 'We expect companies to support environmental protection and enhancement of priority habitats such as chalk streams.' These directions apply to all Chalk streams, not just to some of them.	Cambridge Water is committed to delivering improvements and enhancements to the river network within our region. We are working to identify the opportunities to further reduce our abstraction from the chalk stream aquifers; however this relies on other sources of water being developed in order to ensure we are still able to meet existing supply, and the future predicted increases in demand. We are working with other water companies and with Water Resources East to develop both short and long-term options which will enable us to progress this work at pace. We support local level improvements through our PEBBLE fund – a grant scheme where local groups and organisations can apply for funding to deliver biodiversity improvement	none

		projects. Over the last few years, we have supported projects on the River Mel, River Shep, Mill River and Vicar's Brook. We are part of Defra's Chalk Stream Restoration Group and are already undertaking detailed scoping work on the rivers in our region to identify some flagship projects we can promote through this. We have contributed to and are supportive of the CaBA Chalk Stream Restoration Strategy, are this will form a key thread through the Environmental Destination workstream at Water Resources East.	
96	**Strategic Priorities** 6. A strategic priorities for abstraction that affects Chalk streams, we call on Cambridge Water to: • Reduce abstraction from the Chalk aquifer in the Cam catchment at source, so that springs and headwaters run freely throughout the year, every year, whatever the weather. • Reconfigure the company's water supply systems by applying a 'Chalk-streams first' solution to the Cam, as Affinity Water plans in its Central supply area, supported by water transfers. • Cap Chalk aquifer abstraction at current levels, regardless of licence entitlements, and meet all immediate increases in public demand (new development is adding particular pressures in Cambridge Water's supply zone) via surface water transfers from Anglian Water. • Reduce water wastage through investment in leakage control, compulsory metering, and demand management in all its forms.	As part of our WRMP24, we are reviewing our demand predictions and our available supply, and combining this with the environmental destination we wish to achieve. As such, we know there will be a deficit and we are exploring all options to reduce demand and develop alternative supply options to manage this. This work will be ongoing over the next 12 months and our draft WRMP24 draft will outline how we will balance all of these needs and the timescales for delivering them. Our WRMP19 includes measures that 'cap' abstractions at historic levels, a commitment to not use around 20% of current licences. We are also committed to a long term programme of measures, both locally and regionally, to ensure that our chalk streams are protected and restored. We are working with Anglian Water and Affinity Water to identify any short term options to support any new demand	None required

		through population growth, and these may take the form of surface water transfers. These are currently being developed between the companies at pace to ensure they are available from 2025 onwards. We have an established programme of communications to support demand management and enhanced metering alongside our ambitious leakage reduction plans. This is increased early on in a drought, in response to environmental stress and other drought impact to reduce demands, and our programme of measures will be reviewed for WRMP24. Currently we are committed to delivering a 15% reduction in leakage between 2020 and 2025, and an overall 50% reduction in leakage by 2050. We are also on track to be net zero by 2030. We are now in an area classed as serious water stress and so are exploring compulsory metering as an opportunity – we currently have approx. 78% meter penetration in our area, and we are only able to progress compulsory metering if we have customer support; hence we are currently undertaking a customer engagement exercise to understand customer support for this.	
97	**Strategic Priorities** 7. These obligations should be viewed as essential elements in Cambridge Water's plans, not as bolt-ons. The company will have no business to operate if it fails to care for the natural capital assets on which its corporate survival depends - aquifers and rivers. The company needs to recognise and promote these	The environment is a core theme for all of the planning work at Cambridge Water, and this will be reflected further in our next business plan for PR24 which is currently in development. Here the environment will be a strategic priority and will form a core part of our plan.	None required

	as economic assets in their own right. Monies spent on substantial and needed improvements in their ecological health would then be reflected in an increase in asset value.	We recognise our obligations and responsibilities to the water environment and that the health of this is fundamental to our operations. We are committed to environmental improvements, not just through reviewing our abstraction regime, but through all aspects of our business, as is reflected in our current commitments: - Achieve net zero by 2030 - Reduce leakage by 50% by 2050 - Deliver PCC of 110 l/p/d by 2050 In addition, South Staffs Water, who are the parent company of Cambridge Water, was the only Water only company to submit a bid for funding under the Green Recovery scheme, and following our success through the process, we are now delivering improvements to our major water treatment works to reduce carbon and improve quality.	
98	**Performance standards and drought management** 8. Cambridge Water's performance commitments should similarly reflect local environmental needs. The final plan will need to be reconfigured to reflect the formal designation on 01/07/21 of the company's supply zone as an 'area of serious water stress'. Customers should accordingly no longer expect to have unlimited supplies of water all year-round, for all purposes, without limitation. Yet Cambridge Water is still working to standards for the use of Temporary Use Bans and Non-Essential Use Bans that would be more appropriate for Scotland. The three water companies should impose a Temporary Use Ban *every year* from 1 May to 31 August, to signal to the public that water is scarce and needs to be used	As part of the development of our next Water Resource Management Plan (WRMP), we are reviewing the use of demand management options, to ensure that we are doing everything we can to reduce demand in drought conditions, before we have to look at increasing supply. One element of this relates to the use of temporary use bans, and non-essential use bans. Traditionally in the UK, temporary use bans have always been seen by the public and the media as a significant failure. At Cambridge Water, we are keen to have conversations with our customers, our regulators and all relevant stakeholders in order to try and	None

	wisely. Current standards are not more than once in 10 years for Affinity Water and not more than once in *20* years for Cambridge Water. These are inappropriate.	change this viewpoint so that temporary use bans can be used as a proactive demand management tool. Some of our customer engagement work over the last few months, to support the development of the WRMP, has shown that when the water resource situation is explained to customers, they are more open to the more frequent use of temporary use bans and see this as everyone doing their part to help, rather than it being the failure of a water company. Cambridge Water is embarking on a significant campaign to raise awareness among our customers of the current challenges and the part that each of us can play, and we're planning further customer engagement work to explore further how often customers feel it is reasonable to introduce temporary use bans.	
99	**Performance standards and drought management** 9. Cambridge Water's drought trigger levels should similarly reflect *environmental impacts*, not simply the availability of licensed quantities. The Environment Agency's approach to drought management should be fully integrated into the company's plans. Avoiding and alleviating environmental stress should be treated as being just as important as avoiding any impacts on public supplies. More robust action to restrict usage could then be taken much earlier than is possible now, with a better chance of avoiding the environmental damage caused by low or non-existent flows.	We have updated table 1 in the plan to provide further detail on environmental stress triggers. Our plan focuses on demand management before additional supply options; this is to ensure that environmental stress is mitigated wherever possible. We have an established programme of communications to support demand management and enhanced metering alongside our ambitious leakage reduction plans. This is increased early on in a drought, in response to environmental stress and other drought impacts to reduce demands.	Table 1 Appendix B

		We have discussed the use of temporary use bans in more detail in our response to #98.	
100	**Performance standards and drought management** 10. The draft plan now includes several environmental indicators in its 'Drought triggers and actions' (see below). While these references are welcome, they do not appear to make any material difference to the timing of the introduction of any restrictions on water use; this appears still to be based solely on the availability of water supplies. Much greater weight should be placed on reducing the environmental impact of the Company's abstractions during droughts by doing more, sooner, and more often, to cut consumption. Hence, for example: •Level 1 actions should become part of 'business as usual' (which should also include an annual Temporary Use Ban from 1 May to 31 August). •Level 2 actions should be implemented when the Environment Agency declares 'Prolonged Dry Weather' status. •Level 3 actions should be implemented when the Environment Agency determines that river flows in the Cam are 'notably low'	We have updated table 1 in the plan to provide further detail on environmental stress triggers. There is specific legislation on the circumstances in which we can impose restrictions on use, which we adhere to. We have discussed the use of temporary use bans in #98 above.	Table 1 Appendix B
101	**Learning from overseas experience** 11. Water tends to be taken for granted in the UK. Many people will be surprised that no less than 15 water supply zones in the south east and midlands have now been designated as 'areas of serious water stress'. Other countries are much more aware of the scarcity and fragility of their water supplies. They have developed innovative approaches to water management of which there appears to be little awareness here, but these are no less applicable to the challenges we face. **Annex 2** sets out	Thank you for sharing these examples. We are keen to learn from other countries and experiences, and believe that a national scale effort is required to deliver a step change in customer engagement and understanding on the issue of water stress and the challenges we face. Cambridge Water will soon be embarking on a large scale customer communication strategy designed to raise awareness of water consumption and the challenges posed	None

	examples from South Africa, where restrictions on water use that are in place at all times can be progressively ratcheted up when dam water levels fall below key thresholds.	by this. It will aim to educate customers and share practical tools and tips to help drive behavioural changes. In addition, Cambridge Water has co-sponsored an application for funding through MOSL to provide a facility to support business users with water efficiency. Whilst this role sits with the retailer currently, we acknowledge that more support could be offered to signpost businesses to find the relevant tailored information, and provide more relevant and tailored options. We are constantly developing our approach to water efficiency, within UK legislation, and suggestions on innovation are always welcomed.	
102	**Learning from overseas experience** 12. We have recently called on Ofwat to examine all such options and consider what role they could play in promoting environmentally-sustainable water use in the UK. The South African measures include many more practical and fiscal tools, incentives and penalties to control discretionary use than are available in the UK. Importantly the measures safeguard access to affordable water for the poor for all essential needs, so that no-one's health suffers, and that should be the case here too. We commend these approaches equally to Cambridge Water in developing its policies and plans.	We welcome exploration of other tools for sustainable water use, such as variable tariffs. We are asking our customers, through our WRMP customer engagement work, to share their views on tariffs, compulsory metering and other demand management options. We are also working with Water UK and other water companies to drive changes at a national level to key policies, such as water efficient house building, water efficient appliance labelling, and water recycling schemes.	
	Cambridge Green Party		
103	We consider that the Draft Drought Plan fails to recognise the very serious situation that the region finds itself in as a result of	We have revised the introductory text to include further reference to the issues our region faces, and the update to	Introduction

	excessive water abstraction caused by the dramatic urban development in and around Cambridge. The situation is made worse by the growing and very obvious impacts of climate change on residents, businesses, agriculture and biodiversity. The draft plan barely acknowledges either the rapid growth of the city, or that fact that the anticipated increased frequency of drought periods and more erratic rainfall will negatively impact the ways that water is obtained and distributed. New development is adding particular pressures in Cambridge Water's supply zone and the final plan must therefore reflect the formal designation this year (1st July 20210) of the company's supply zone as an 'area of serious water stress'. There is a brief statement in the introduction noting that Cambridge Water operates "in one of the driest and fastest growing regions in the UK, and significant future housing growth is planned in the coming years". This is the only reference to the current over-development and water abstraction crisis. We are equally concerned about the use of the word 'may' in the statement 'We also acknowledge that not all existing abstractions are sustainable over the long term and may already impact river flows' and 'we are investigating any abstractions that may impact the environment through the Water Industry National Environment Programme'. This suggests a reluctance to acknowledge, and even institutional blindness to, the current emergency situation. The introduction indicates that the company is waiting for "long-term planning" to come to fruition, a completely inadequate response, given the many actions that can be taken now.	water stress status. The purpose of a drought plan is not to address general issues of growth, climate change and sustainable abstraction, but to demonstrate our operational response to a range of droughts to ensure availability of water supplies. Future planning for growth and addressing longer term environmental needs is undertaken through our WRMP's, and regional planning. We are committed and fully engaged in long term planning with WRMPs and regional planning to ensure these issues are addressed.	
104	**Lack of emphasis on environmental issues**	The purpose of a drought plan is not to address general issues of growth, climate change and sustainable abstraction,	none

	We do not think that the draft plan describes the current water context and the close interaction of the city's water supplies with the environment sufficiently accurately. There is no explanation of how current abstraction rates are damaging the environment, particularly our Chalk streams which are now seriously at risk – we are astonished that there is no mention of these streams. The long-standing impacts of over-abstraction on Chalk streams in the Cam catchment are proven and increasingly recognised by public bodies, both regionally and nationally (see documentation available through the Cam Valley Forum and Friends of the River Cam). For example, the Government's draft Strategic Priorities for Ofwat include: 'We expect companies to support environmental protection and enhancement of priority habitats such as chalk streams'. Affinity Water's recent Draft Drought Management Plan specifically references its environmental responsibilities and makes 81 references to 'Chalk', reflecting its commitment to restoring Chalk streams in the Chilterns; Cambridge Water's draft makes a single reference to "Chalk". We would like to see Cambridge Water make a similar commitment to fulfilling its global responsibility to care for and restore the Chalk streams affected by its activities, in all its policies, plans and relevant actions, including its Drought Management Plan.	but to demonstrate our operational response to a range of droughts to ensure availability of water supplies. Future planning for growth and addressing longer term environmental needs is undertaken through our WRMP's, and regional planning.	
105	**Respective roles of Cambridge Water, the public and other stakeholders** The plan puts too much onus on the public to reduce water use: agriculture and industry are also major users. While we need to be sure that food is produced there are huge changes that all these industries can make to reduce water use: farms can make their own reservoirs and use the regenerative farming	The majority of water use by our customers is domestic, and this is therefore a key area of influencing reductions in water use. Other retailers operating in our area have the same requirements to promote water efficiency and we work with these retailers wherever possible to promote such messages. Our drought Communications Plan sets out how we will escalate this during a drought. We are unable to significantly	Appendix B

	approach; industries can change how they use water and design less wasteful methods. We recognise that it will take collaboration between many organisations, regulators and the private sector to address all the issues involved, but the Drought Plan needs to set this out clearly, in order to identify exactly where Cambridge Water itself has the potential to show leadership.	influence other sectors direct water use that is not from public water supply, however we work closely with these other sectors for future long term planning and water issues.	
106	**Improved communication and awareness-raising** Lessons can be learnt from mechanisms (such as road shows, mobile information stalls, identifying community "champions") currently being used to improve up-take of COVID19 vaccinations which are having a demonstrated impact. Cambridge Water needs to work more closely with voluntary groups and the media to communicate the importance of water and water-saving messages to households and businesses including recycling, re-use (grey water) and collection of rain water. The website quoted in the draft plan (https://www.savewatersavemoney.co.uk/) gives a very limited range of options, does not cover all water-saving options available (e.g. SUDS, wetland systems etc) and the draft plan fails to provide local examples of good practices that in many cases are ahead of government requirements: as an example, many allotments have, of their own accord, installed rain water collection mechanisms (e.g. Foster Road Allotments Trumpington Cambridge have just installed a 6,000 litre rain water collection butt). Cambridge Water could provide more help and advice to such groups – allotments in particular are contributing increasingly to food security in the city as more and more people start to grow their own vegetables, often sharing their crops with those unable to do so.	We have an established programme of communications on the importance of water saving and the environment, through social media, advertising and other direct customer contact. This is increased early on in a drought, in response to environmental stress and other drought impact. We have updated our Communications Plan in which we describe the communications channels that we use. Outside of the drought planning process, we have also supported CoFarm in Cambridge, a local group growing produce for the area.	Appendix B

107	**Key changes needed** We are sorry that the points made by Cam Valley Forum and others in their pre-consultation response, were not fully addressed in the draft. We believe the following are essential components that should be covered in more detail in the final Drought Plan, with the overall ambition of reduction of abstraction from the Chalk aquifer in the Cam catchment *at source*, so that **springs and headwaters run freely throughout the year, every year, whatever the weather:** • Defining a **minimum baseline of mandatory restrictions** on household and business use of water **to be applied at all times,** with further restrictions to be imposed as a matter of course from May to August at minimum every year (e.g. a ban on household use of sprinklers and hosepipes, including high-pressure hoses used to clean driveways and patios). TUBs are a key component of drought plans, and Cambridge Water lags behind other companies in implementing these. As pointed out by the Cam Valley Forum, Cambridge Water is still working to standards for the use of Temporary Use Bans (TUBs) and Non-Essential Use Bans that would be more appropriate for Scotland. • **Cambridge Water's drought trigger levels should reflect environmental impacts**, not simply the availability of licensed quantities. There appears to have been no significant change to the mechanism for determining triggers for action, and it is highly likely that if action is taken using the mechanism in the draft plan, it will come too late. The Environment Agency's approach to drought management should be fully integrated into the company's plans. Although the draft plan includes several	The purpose of a drought plan is not to address general issues of growth, climate change and sustainable abstraction, but to demonstrate our operational response to a range of droughts to ensure availability of water supplies. Future planning for growth and addressing longer term environmental needs is undertaken through our WRMP's, and regional planning. There is specific legislation on the circumstances in which we can impose restrictions on use, which we adhere to. Our level of service for imposing restrictions is supported by our customers. We have updated table 1 in the plan to provide further detail on environmental stress triggers. Implementation of demand management measures on a business as usual basis is evaluated through our WRMP. Our WRMP19 includes ambitious leakage and demand reductions, and these will be reviewed for WRMP24 in 2022. Our WRMP19 includes measures that 'cap' abstractions at historic levels, a commitment to not use around 20% of current licences. We are committed to a long term programme of measures, both locally and regionally, to ensure that our chalk streams are protected and restored. We have an established programme of communications on the importance of water saving and the environment, through social media, advertising and other direct customer	Table 1

	environmental indicators, these do not appear to make any material difference to the timing of the introduction of restrictions on water use which appears still to be based solely on the availability of water supplies. • **Immediate reduction of water wastage** through investment in leakage control, compulsory metering, and demand management in all its forms, as mentioned above. • Reconfiguration of the company's water supply systems by **applying a 'Chalk-streams first' solution**, as Affinity Water plans for its Central supply area, supported by water transfers. We would also like to see capping of Chalk aquifer abstraction at current levels, regardless of licence entitlements; immediate increases in public demand can be met via surface water transfers from Anglian Water.	contact. This is increased early on in a drought, in response to environmental stress and other drought impact.	
	Friends of Cherry Hinton Brook		
108	Reduction of abstraction from the Chalk aquifer in the Cam catchment at source, so that springs and headwaters run freely throughout the year, every year, whatever the weather. This would involve defining a minimum baseline of mandatory restrictions on household and business use of water to be applied at all times, with further restrictions to be imposed as a matter of course at least from May to August every year (e.g. a ban on household use of sprinklers and hosepipes, including high-pressure hoses used to clean driveways and patios).	Our WRMP19 includes measures that 'cap' abstractions at historic levels and we are committed to a long term programme of measures, both locally and regionally, to ensure that our chalk streams are protected. There is specific legislation on the circumstances in which we can impose restrictions on use, which we adhere to. Our level of service for imposing restrictions is supported by our customers. Implementation of demand management measures on a business as usual basis is evaluated through our WRMP. Our WRMP19 includes ambitious leakage and demand reductions, and these will be reviewed for WRMP24 in 2022.	none

109	Cambridge Water's drought trigger levels should reflect environmental impacts, not simply the availability of licensed quantities. Although the draft plan includes several environmental indicators, these do not appear to make any material difference to the timing of the introduction of restrictions on water use which appears still to be based solely on the availability of water supplies.	We have updated table 1 in the plan to provide further detail on environmental stress triggers. There is specific legislation on the circumstances in which we can impose restrictions on use, which we adhere to. Our level of service for imposing restrictions is supported by our customers.	Table 1
110	Immediate reduction of water wastage through investment in leakage control, compulsory metering, and demand management in all its forms, including improving public awareness campaigns that promote water harvesting and greywater recycling schemes.	Implementation of demand management measures on a business as usual basis is evaluated through our WRMP. Our WRMP19 includes ambitious leakage and demand reductions, and these will be reviewed for WRMP24 in 2022. We have an established programme of communications on the importance of water saving and the environment, through social media, advertising and other direct customer contact. This is increased early on in a drought, in response to environmental stress and other drought impact.	Appendix B
111	Reconfiguration of the company's water supply systems by applying a 'Chalk-streams first' solution to the Cam, as Affinity Water plans in its Central supply area, supported by water transfers.	The purpose of a drought plan is not to address general issues of growth, climate change and sustainable abstraction, but to demonstrate our operational response to a range of droughts to ensure availability of water supplies. Future planning for growth and addressing longer term environmental needs is undertaken through our WRMP's, and regional planning.	none
112	The immediate capping of Chalk aquifer abstraction at current levels, regardless of licence entitlements, with publication of any incidents where abstraction levels exceed capped abstraction and the action taken in response.	The purpose of a drought plan is not to address general issues of growth, climate change and sustainable abstraction, but to demonstrate our operational response to a range of droughts to ensure availability of water supplies. Future planning for growth and addressing longer term	none

		environmental needs is undertaken through our WRMP's, and regional planning. Our WRMP19 includes measures that 'cap' abstractions at historic levels and we are committed to a long term programme of measures, both locally and regionally, to ensure that our chalk streams are protected and restored.	
	Friends of the Cam		
109	Please find attached a collection of feedback about the waterbody we call the Cam. Today, citizens in Cambridge are gathering to declare the Rights of the River Cam, led by the Friends of the Cam group. We strongly believe that the river should have a voice at the negotiating table with all the other bodies invested in its use. As part of this exploration into whether the River Cam could enjoy the same rights as companies and individuals I invited poets to respond to Peter Simpson's foreword to the Anglian Water Pollution Strategy 2020-25 for a project we called River Cam Erasures. An erasure poem is made using an original text and removing words until a new meaning is revealed. Please read the feedback we're providing in the spirit it is intended, which is an invitation to you and your company to consider the resource first and provision second. You yourselves have carried out extensive studies and monitoring which confirms that the river is not being respected and we are starting this motion now to give the river Cam the same rights as your company and the people it serves. That seems only fair. We are all working towards the same goal of not losing our precious chalk stream environment	We appreciate these comments and the passion for the waterbodies in our region. We have an established programme of communications on the importance of water saving and the environment, through social media, advertising and other direct customer contact. This is increased early on in a drought, in response to environmental stress and other drought impact.	None applicable

	and we don't doubt you can do more and faster to protect the waterbodies of the Cam.		
	Customer panel		
110	All statements referred to customer facing summary, providing advice on wording and format to ensure it is clear and concise for our customers to read and interpret	We have updated our customer facing summary accordingly to reflect the constructive feedback from our customer panel	Non-technical summary
	Customers via H2Online forum		
111	All comments referred to customer facing summary, and suggested production of a video and infographic to share the information in an easily digestible format that can be readily accessed and quickly understood	We are currently developing the video and infographic and these will also be used as part of our drought plan communications with our customers	none