

Appendix A

Drought Plan Consultation

1. Introduction

Cambridge Water is committed to engaging with all the stakeholders who have an interest in this plan. The Company has undertaken consultation with these stakeholders and the public in preparing our drought plan, as explained in this document.

2.1 Pre consultation

In accordance with the EA drought plan guidance we have consulted with statutory consultees prior to producing our draft plan to identify any issues of importance and for any comments that we should consider in our plan. Our pre-consultation ran from 15th May to 12th June for which we contacted the following stakeholders to invite comments for consideration in the revised plan;

- Affinity Water
- Anglian Water
- Defra
- Environment Agency
- Natural England
- NFU
- Ofwat
- Customer Challenge Group
- Consumer Council for Water (CCW)
- Historic England

In addition we consulted with local river interest and environmental groups.

Under the EA guidance companies are also required to consult with any licensed water supplier which supplies water to premises in the undertaker's area via the undertaker's supply system. These are 'inset' appointments, and there are currently two such licensed water suppliers operating in the Cambridge Water area of supply, one of which is Anglian Water. In addition Integrated Water Networks Limited (IWNL) have a more recent inset, and we have carried out discussions with IWNL on our respective drought plans.

The comments received during the pre-consultation are summarised in table 1 below;

Table 1. Summary of Pre Consultation Comments

| Consultee | Nature of response received | Relevant section of Plan |
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| Defra | No response | N/A |
| Environment Agency | <p>1. Specific areas to address in your drought plan;</p> <ul style="list-style-type: none"> • Experiences and lessons learnt from prolonged dry weather. The prolonged dry weather experienced during 2018 and 2019 has highlighted the importance of drought planning to minimise the risk to public water supplies and the environment. You should ensure that you review and incorporate any lessons learnt from operational experiences and the prolonged dry weather into your drought plan. • A number of unplanned outages and other operational restrictions in summer 2019 resulted in the trade of water from the Fleam Dyke and Fulbourn licences to the Gt Wilbraham licence. You should review any lessons learnt from this event and incorporate these in your drought plan. • Drought triggers. Groundwater levels in the East of England were at historic lows in 2019. Limiting the risk to the environment in impacted chalk catchments was a priority for abstractors and environmental groups in the region. You should ensure that the groundwater drought triggers in your plan are appropriate and that environmental monitoring, mitigation measures and communication actions are in place. This includes reducing abstraction and demand to help protect the environment and conserve resources. • You should demonstrate how you have thought ahead to help minimise the possible environmental effects of droughts. This means you need to be proactive in implementing your drought actions and consider the use of effective environmental triggers and actions. • Drought management actions. You should engage with us early to discuss the potential supply options in your drought plan. Your current drought plan relies on increasing the use of existing sources during a drought, but these options are also identified as preferred supply options in your WRMP. This leaves you vulnerable under severe drought conditions and may increase the need for more severe restrictions. • If you identify options that involve re-commissioning unused licenced sources of water, that have not been used for a long time, you will need to complete a new environmental assessment and address the requirements of the Drinking Water Inspectorate. You must plan to implement your demand saving actions first and prioritise | |

the use of your least environmentally damaging supply actions. This means we expect you to take actions to reduce leakage, outage and customer demand before taking more water than licenced, from the environment.

- Communications and engagement. You should engage with neighbouring water companies and your regional water resources group WRE and its members when developing your plan. This includes the benefits of joint regional water resources group communication campaigns and aligned customer restrictions as well as regional supply actions. Your plan should show how you will work with neighbouring companies and other stakeholders across the water sector to mitigate the impacts of droughts and save and share water resources in times of extreme drought. You should consider regional connections and collaborative actions with neighbouring companies and ensure that actions are coordinated. You should demonstrate how you will pro-actively scale up your household and retail customer campaigns appropriately as dry weather takes hold. It is particularly important that your communications during drought help your customers to understand the links between their water use and the resultant environmental consequences.
- Bulk supply agreements You should confirm if your bulk supply arrangements change in drought conditions and ensure that there is a common understanding of their operation in both companies' drought plans.

2. Wider issues to consider

Water companies should follow the water company drought plan guideline when preparing their draft drought plans. This is available, along with any supporting guidance documents on the Defra Huddle: <https://www.huddle.com/> and also on request from our mailbox Water-Company-Plan@environment-agency.gov.uk. For login details for the huddle or any problems with access, please contact Defra directly at water.resources@defra.gsi.gov.uk. We expect you to consider all relevant statutory requirements including the new Drought Plan (England) Direction, published April 2020 and the government's expectations for drought planning, as detailed in its letter of 6 April 2020. If you identify the need for supply side drought permits or orders, you must carry out an environmental assessment and produce an environmental monitoring plan, which includes any mitigation measures you plan to implement.

3. Pre-consultation letter questions.

Our response to the specific question you raise in your pre-consultation letter is below. Your request: I should be particularly interested to learn whether your organisation has any proposals for drought actions which might affect our ability to supply our customer in the event of a future drought. You should utilise our East Anglia Area drought plan when preparing your drought plan, this is available on request from your local Environment Agency Area contact. Areas can decide whether to change status for the whole Area or just for one or more catchments depending on what triggers have been met,

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| | <p>for example, the Cam and Ely Ouse. This could affect the frequency and timescales of when the majority of your company operating area is defined as being in prolonged dry weather / drought. You should work with East Anglia Area to understand how these changes could affect your own plan.</p> <p>4. Customer and third party involvement To gain a wider range of views before preparing your draft plan we recommend that you consider consulting the following consultees during your draft drought plan consultation. Independent Water Networks Limited as they have recently been granted a licence to supply water to customers in your supply area. Given the focus on ensuring resilience now and in the future, not only for public water supply but also for the environment you should consult with Environmental Organisations that your drought plan is likely to affect.</p> | |
| Natural England | <p>The Drought Plan should be prepared in the context of existing evidence regarding the condition of protected sites that are potentially impacted directly or indirectly by abstractions from the Cambridge Water aquifer. As you may be aware, there are a number of SSSIs that are currently in unfavourable condition, in part due to issues connected with water quality or water availability. In particular water abstraction is believed to be a critical factor impacting on the condition of certain sites. Natural England has not conducted an exhaustive assessment of such sites, but are likely to include Dernford Fen SSSI, Sawston Hall Meadows SSSI and Thriplow Peat Holes SSSI amongst several others.</p> <p>The Drought Plan needs to factor in the consideration of how it may impact on the condition status of those sites. Consideration of sites potentially impacted should also include those indirectly affected by abstraction through for example surface water flows.</p> <p>The recharge schemes that exist to address water shortage to certain sites do not appear to function effectively during times of drought. This needs further investigation to ensure measures for safeguarding such sites are effective.</p> <p>We trust that these matters will be addressed through the draft Plan and accompanying HRA and SEA</p> | |
| Anglian Water | <p>it would be good to discuss our plans, especially as coordination with neighbouring companies is a requisite.</p> | |
| Ofwat | <p>No response</p> | |
| Customer Challenge Group | <p>confirm that we had no comments to offer in advance of seeing draft plans, and by saying that we would appreciate the chance to view and challenge the draft plans when they are ready.</p> | |

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| <p>Consumer Council for Water (CCWater)</p> | <p>When considering a current Drought Management Plan and the revisions we would like to see, CCW's main areas of focus are: the extent to which the company has engaged with its customers on its strategy for managing a drought; and the extent to which customers' views and priorities are reflected in the company's Drought Management Plan.</p> <ul style="list-style-type: none">• We expect the revised Plans to make clear the company's strategy: for engaging with household customers, both prior to and during a drought, and as the drought recedes;• for working with retailers to engage with non-household customers, both prior to and during the drought, and as the drought recedes; and approach to the phasing-in of temporary use restrictions (TUBs);• for how the company will approach an emergency drought situation; and• for promoting water efficiency in non-drought times. We would expect companies to utilise a wide range of methods of communication. <p>We expect companies to follow the principles set out in the Water UK/UKWIR Code of Practice on Temporary Use Restrictions, and the recent National Framework for Water Resources. In doing so we want the company to demonstrate an understanding of the impact these measures are likely to have on different customer groups, and to show how this understanding has informed its approach.</p> <p>We also expect that incidents encountered since the 2018 Plan to be taken into account and the lessons learned to be reflected accordingly. For example, during the summer of 2018 and the COVID-19 pandemic there was/has been dry weather combined with high water demand. We want the revised Plans to explain if the supply challenges have led the company to reconsider any aspects of its response to drought, particularly with regards to vulnerable customers.</p> <p>In instances of dry weather combined with high water demand, it is important that the specific needs of customers are understood and delivered. We are aware that South Staffs Water has been actively promoting awareness of the Priority Services Register in a water efficiency leaflet and asking customers to register for assistance. We expect the learnings to be taken into account in the revised Drought Management Plans and built upon.</p> <p>On a regional level, we are aware that water companies are co-ordinating their water resources management planning. It would also be beneficial for there to be some closer alignment in the regional approach to drought management. We would like to see examples of how this is happening. For example, in the way TUBs are introduced and exemptions applied, or introducing regional communication strategies.</p> <p>In undertaking your Plan revisions, we would expect to see evidence of effective engagement with your customers. We</p> | |
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| | <p>would like you to consider whether stand-alone research on drought management and your communication strategy is required in order to provide this evidence. This will help to ensure your developing Plans are based on customers' views and priorities.</p> <p>Finally, we welcome the non-technical summaries of your Drought Management Plans 2018. These helpfully set out the process you follow in times of drought. They are customer friendly summaries and we want to see a repeat of these documents as you revise your current Plans for both regions.</p> | |
| Affinity Water | No response | |
| Historic Engalnd | <p>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). Changes in hydrology have the potential to affect a wide range of heritage assets such as moated sites, medieval fishponds or water features in Registered Parks and Gardens. For example, in historic parks and gardens droughts could have serious impacts and management problems for</p> <ul style="list-style-type: none"> • Lakes and water features, water levels and water quality, and can lead to algal blooms • New tree planting and tree establishment • Long term damage to trees and shrubs • Impaired performance of features such as fountains and cascades • Gardens • Loss of evapotranspiration functionality of parks and green spaces in tempering urban heat • Impaired sustainable drainage functionality when it does tip down with rain • Wildlife and fish • Reservoir developments <p>All these issues will affect the aesthetics and visitor appeal of sites. 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 record held at Cambridgeshire 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. 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. They are of great importance for the information they provide</p> | |

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| | <p>about everyday objects such as drinking and eating vessels (wooden bowls, leather bottles, horn cups), clothing (fabric, shoes), modes of transport (boats, trackways) and equipment of subsistence (fishtraps). To maintain the preservation of organic materials, it is essential that the conditions which contributed to their survival (waterlogged; anoxic) remain the same. While saturated with water, oxygen is excluded which limits the presence/action of most soil fauna (insects, moulds, and micro-organisms) and fungi which feed on organic matter. The lowering of the watertable in an area could result in the remains becoming exposed to oxygen, which can enhance the degradation and loss of any remains that are present. We suggest that a strategy is therefore needed that discusses how these sorts of sites will be managed in the proposed Drought Management Plan, which makes reference to the Historic England 'Preserving Archaeological Remains' guidance (2016): https://historicengland.org.uk/images-books/publications/preserving-archaeologicalremains/ In answer to your question as to whether our organisation has any proposals for drought actions which might affect your ability to supply customers in the event of a future drought, we can confirm that no, we have not produced a plan, but if that is something that Historic England need to do then we could potentially consider factoring that into future work plans.</p> <p>Generally Historic England doesn't manage water on a site as we don't manage sites. Whilst we are not aware of any specific drought plans more progressive conservation management plans for individual sites may be looking at climate change issues like water shortages. We are concerned about changes to systems as this can alter the water levels on a site, which can in turn change the preservation conditions and lead to the damage and/or loss of fragile archaeological remains. We understand that water management (flood and drought) needs to be more holistic and analysis of the historic environment can potentially help these discussions in showing how water has been managed over time and learn lessons from the past using existing features such as fish ponds.</p> | |
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| <p>Friends of Cherry Hinton Brook</p> | <p>We have been very concerned in recent years by the low flow rates and water levels of Cherry Hinton Brook and understand that this is in large measure due to the current levels of abstraction from the chalk aquifer which supplies the brook. This represents a major threat to the important wildlife of the brook, which is one of the most important sites in the City for water voles, and which provides suitable conditions when flowing adequately for a variety of other important biodiversity. We think that it is essential that the Brook, and other chalk streams flowing into the Cam, should be restored to 'good ecological status' with flows at natural or near-natural conditions. We therefore fully support the recommendations made in the recently published report by the Cam Valley Forum Let it Flow! (their submission to Water Resources East)</p> | |

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| | <p>and in the River Cam Manifesto that they released last year. These documents present a number of options for making significant reductions in water abstraction and tackling pollution and habitat modifications, including:</p> <ul style="list-style-type: none">• Closing and or/reducing the number of boreholes, which will help Chalk streams flow more naturally• Finding alternative sources of water (a number of which are suggested in the CVF reports)• Promoting water harvesting and greywater recycling schemes. Given that these solutions will take time to plan and implement, we would also like to see immediate action to reduce leakage and ensure that supply is metered. Many of our members and partners, who include numerous city residents, are similarly concerned and keen to take appropriate action themselves, but need encouragement from the water companies. For example, the Burnside and Vinery Road Allotment Society, which manages the allotments adjacent to the Brook, are currently looking at how they can encourage their allotment holders to increase the harvesting of water and thus reduce the use of the mains supplied troughs that they have installed for watering. Examples like this could be used to encourage others in the City to make similar changes. Friends of Cherry Hinton Brook have promoted the need to save water at both our own meetings and the various events that we attend; for example, we have supported a primary school in Cherry Hinton who undertook a water-saving project with the children. We would be willing to work further with Cam Water to help communicate the water-saving and recycling message. | |
| | <p>Further to your email to stakeholders of 15 May, the Cam Valley Forum welcomes the opportunity to contribute ideas for your consideration in preparing your latest draft Drought Plan.</p> <p>As you know, we have recently published Let it Flow!, our submission to the ongoing work of Water Resources East. I attach section 4.5 of this Report, together with an additional table. I also attach separately, a copy of our full report, for convenience.</p> <p>Our starting point is that the current level of abstraction from the Chalk aquifer reduces natural flows and damages biodiversity in the Cam Valley. The status quo is unsatisfactory: the Cam Ely Ouse catchment is 'over licensed and over abstracted' (current Drought Plan, p84). The need for 14 augmentation boreholes supporting some 30 spring heads is evidence in itself of significant longstanding and ongoing environmental impacts. Our ultimate aim is to achieve 'good ecological status' for all Chalk streams, restoring their flows to natural or near-natural conditions, by making significant reductions in water abstraction, and tackling pollution and habitat modifications.</p> | |

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We argue that the problem of low flows is due not to fluctuations in rainfall, which has remained fairly constant, but to the lowering of water tables by over-abstraction. Substantial soil moisture deficits need to be overcome each year before aquifer recharge begins. We show that in about 24 (41%) of the 59 years to 2019, winter rainfall has not exceeded the previous deficit. The rainfall the following winter then has to eliminate a deficit accumulated over two years before it starts to replenish the Chalk aquifer. When recharge is inadequate - which it appears to be 40% of the time - we all have cause to be concerned that streams and wetlands will dry out in the following summer. We accordingly seek substantial reductions in current levels of abstraction from the Chalk aquifer. The step changes that we seek in the approach to water supply for the Cam catchment include: (a) Closing/reducing boreholes to let Chalk streams flow naturally and abstracting and storing winter flows instead from the rivers downstream. (b) Bringing in supplementary sources of water through within-region and between-region transfers. (c) Developing reuse schemes for all rural and urban sewage works, providing resources for aquifer recharge. (d) Driving down demand through water harvesting and greywater recycling schemes.

However, planning and delivering the necessary infrastructure will take many years. That is why we also seek, now, a far more resolute approach to water efficiency, whereby 'wise use' becomes the norm and restrictions ratchet up rapidly when necessary in dry periods. This should include more and faster action to reduce leakage and to meter supplies, and an ambitious programme to manage household and business demand. At no time is this more important than during a drought.

We seek a significant change in attitudes to water, from OFWAT downwards, learning from other countries that put more weight on safeguarding water resources than on meeting every possible public supply need, everywhere, all the time, with never any restriction. Our report includes examples from South Africa but your new Managing Director, Andy Willicott, will doubtless have experience of similar good practice from Australia. We seek greater ambition, and greater resolution, in driving down demand, and earlier action to go further whenever recharge is poor. This will improve resilience for both water supplies and the environment.

We would like Cambridge Water to lead the charge in making Cambridge the 'No. 1' water-saving city in England. We encourage you to develop a comprehensive demand management plan: (a) Defining a minimum baseline of mandatory restrictions on household and business use of water to be applied at all times. (b) Defining further restrictions to be imposed as a matter of course at least in the four months 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). (c) Agreeing groundwater level

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| | <p>'trigger' points at which progressively more demanding restrictions on household and business use of water will apply. (d) Rolling out smart water meters in homes, schools, businesses, hospitals and public buildings to enable continuous tracking of water use and encourage savings supported by effective training and incentives for building managers to reduce consumption. (e) Actively reducing water pressure as groundwater 'trigger' points are reached. (f) Installing water management devices in pipes supplying those customers whose use of water regularly exceeds guideline targets. (g) Working with voluntary groups and the media to communicate the importance of water and water-saving messages to households and businesses. (h) Learning from other countries about the costs and benefits of introducing progressive tariffs, linked to water supply 'trigger' points, to discourage profligate use of water.</p> <p>As Stephen Tomkins indicated in his email to you of 15 May, the Cam Valley Forum remain keen to support Cambridge Water in promoting appropriate water saving measures and related educational initiatives.</p> <p>We hope that this contribution is helpful. We would welcome a meeting with you and your colleagues to discuss your drought planning and Let it Flow! and to identify the areas in which we can work together to best achieve all our public water supply and environmental objectives.</p> | |
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2.2 Consultation on the Draft Plan

We will publish our draft plan to Defra by the 1st April 2021 and following direction to publish our draft from the Secretary of State, there will follow a further public consultation on the draft plan and a statement of response to representations received.

The legislation and Drought Plan Regulation guidelines for consultation on the Drought Plan indicate that the following groups must be notified of the consultation, along with any organisations involved in pre-consultation discussions.

- The Secretary of State for Environment Food and Rural Affairs
- The Environment Agency
- Ofwat
- Relevant water undertakers –Affinity Water, Anglian Water, Essex and Suffolk Water
- The relevant Local Authorities
- Natural England
- English Heritage
- Canal and Rivers Trust (formerly British Waterways)
- The Consumer Council for Water

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In addition to meeting these minimum requirements for consultation the Company will undertake additional consultation with a selection of interest groups or individuals.

- Members of Parliament
- The British Horseracing Authority
- The British Swimming Pool Federation
- The Car Wash Association
- The Horticultural Trades Association
- The National Council for the Conservation of Plants and Gardens
- The Royal Yachting Association
- The Racecourse Association
- The Turfgrass Growers Association
- The National Farmers Union
- The Country Land and Business Association Limited
- The Drinking Water Inspectorate
- The Angling Trust
- The Cambridgeshire Beds and Northants Wildlife Trust

Stakeholders wishing to make representations, comments or raise questions on the draft plan are advised to submit them to:-

Defra
Water Company Drought Plan
Department for Environment Food and Rural Affairs
3rd Floor
2 Marsham Street
London
SW1P 4DF

Or by E-mail to water.resources@defra.gsi.gov.uk

The consultation will be communicated to these parties by direct correspondence, and to the wider public via the Company website, a press release and any other appropriate communication channels.