

# 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 December 2025 until the 10<sup>th</sup> of January 2026. for which we received comments from the following stakeholders for consideration in the revised plan;

- Affinity Water
- Anglian Water
- Canal & River Trust
- Environment Agency
- Natural England
- Cam Valley Forum
- Cambridgeshire County Council
- Cambridge City Council
- South Cambridgeshire District Council
- Historic England
- Hobson's Conduit Trust
- Wilbraham River Protection Society

We also asked DEFRA, Ofwat and the Environment Agency in line with water company guidelines.

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 Services Limited. In addition, we have carried out discussion with Independent Water Networks Limited & Icosa Water Services.

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
Defra	No Comment	N/A
Environment Agency	<p>1. Specific areas to address in your drought plan There are several significant issues that you should resolve when preparing your draft drought plan.</p> <p>Development of Environmental Triggers</p> <p>We support your commitment to further develop environmental indicators and triggers to respond appropriately in a drought to protect the environment and security of supply to customers. We want your triggers to limit abstraction earlier where demand risks abstraction causing environmental stress in prolonged dry weather/drought.</p> <p>The nature of many chalk streams means that whilst naturally ephemeral, the effects of drought can increase the length (time and distance) that the ephemeral stretch lasts. This can be exacerbated by the effects of abstraction. Furthermore, this can happen on rivers when the formal monitoring/classification remains compliant if that assessment is carried out lower down the river reach. Your drought trigger review should consider monitoring changes to dry reaches of headwaters (number, length of reach, duration etc.) affected by your abstraction as an additional indicator of adverse environmental effect. You should also set out a clear plan of how you would carry out this monitoring work, and what action/s you would take if your monitoring shows changes You should continue to work closely with the Environment Agency as you develop your environmental triggers.</p> <p>Review of drought triggers</p> <p>As part of WRMP24, you were instructed by Defra to complete work to revise drought triggers and demonstrate how you will apply drought measures to ensure security of supply and manage abstraction to mitigate the risk of deterioration. This work should be used to inform your updated Drought Plan. We recommend that abstraction from each licensed source of supply should be tracked against the level you have modelled in your WRMP24 submission as resulting in no or low risk of deterioration. You should consider a trigger for the application</p>	

	<p>of formal drought restrictions if abstraction at a source(s) has either:</p> <ol style="list-style-type: none"><li>1. exceeded this modelled level; OR</li><li>2. is forecast to exceed this modelled level based on projected levels of demand for the remainder of the abstraction year.</li></ol> <p>If abstraction exceeds the modelled level for no/low risk of deterioration, you should consider formal customer restrictions and not just be a trigger for enhanced communications. The assessment will need to consider the number of licences where abstraction has either exceeded or are forecast to exceed the no/low risk of deterioration and how these affect different surface water bodies. For example, two licences may affect the same surface water body, and it could be the case that one licence has or will exceed its modelled level of abstraction, but the other has been/will be underused against that modelled level of abstraction. Whilst it's not likely that there will be a 1:1 relationship between each abstraction's quantity and the effect on the surface water body, it is a factor that should be considered.</p> <p>You should also ensure that assumptions around the benefits of Great Ouse groundwater (GOGS) development scheme only reflect the specific licensed quantity for environmental support and that it is not guaranteed to last for the duration of any drought period. The GOGS is principally designed to provide supplies to Essex as part of the Ely Ouse to Essex transfer scheme, i.e. it was intended as a groundwater development scheme, not a river support scheme. A proportion of the GOGS licence has been allocated to support low flows (river support) but the quantities are not designed to offset the effects of abstraction on the supported river reaches in a drought event. The availability of support and its forecast duration should be considered in the triggers for the Thetford licences Brettenham and Euston).</p> <p>As the Water Environment (Water Framework Directive)(England and Wales) Regulations 2017 (WFD Regulations) growth scenario modelling is now completed for the Cambridge region, you should look to use the outcomes of this modelling to inform your drought triggers by using your least risky (WFD) sources first in a drought.</p> <p>You should continue to work closely with the Environment Agency as you develop your drought triggers.</p> <p>Development of Environment Assessments</p> <p>As stated by the Drought Plan guideline in section 6, you must carry out an environmental assessment and produce an environmental monitoring plan for each of the supply actions in your drought plan.</p> <p>Sections 6 of the guideline states your environmental assessments should include any mitigation measures you plan to implement. You should ensure the mitigation measures you include in your Drought Plan are effective and achievable.</p> <p>Section 3.2 of the updated Environmental assessment for water company drought planning supplementary guidance</p>	
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states you may consider using hydroecological modelling approaches to help understand the relationship between flows/levels, habitat, water quality and ecology and assess environmental sensitivity where limited long-term data is available. The supplementary guidance suggests the Hydroecology toolkit as an option for this work. You should continue to work with the Environment Agency as you update and improve your modelling work. Communication should continue through the previously established routes.

In previous versions of the Environment Assessment for water company drought planning supplementary guidance, 'baseline' ecological monitoring has been incorrectly interpreted as commencing once a drought situation occurs, prior to a drought permit application being made. This was not the intention of the guidance. The guidance has been updated to clarify that the baseline is classified as 'normal' conditions (i.e. before dry weather or drought conditions have commenced). You should ensure your plan for baseline monitoring reflects this definition. Where hydrological assessments have been informed by modelled data, you should set out how you will reduce the uncertainty associated with this data. For example, by carrying out a monitoring programme.

Your pre-consultation letter states that you will undertake the appropriate level of environmental assessment, including SEA where applicable. As stated in section 6 of the guidance, early consultation with regulators is particularly important for SEA. Therefore, you should determine early in the planning process whether you will be undertaking a SEA and inform regulators. Incorporating lessons learned from the 2022 drought  
As part of your draft WRMP24, you developed Appendix R 'Cambridge Water 2022 Drought Review'. You should ensure the learning from the 2022 drought detailed in this appendix is fully incorporated into your updated Drought Plan.

#### Demand Management

As set out in section 4 of the Drought Plan guideline, you should implement effective demand reduction measures (including temporary use bans) before application for drought permits/orders and before the implementation of extreme drought actions. These should be clearly set out in the demand side actions of your drought plan and should include leakage management and pro-active customer communications. You should review and update your demand management actions considering any lessons learned during recent dry weather. You should not delay implementation and escalation of any demand management measures, which must be deliverable to ensure your plan is effective operationally.

As stated in sections 4.2.1 of the Drought Plan guideline, water companies are not financially penalised by Ofwat if they implement temporary use restrictions (such as temporary use bans) during a drought. You should ensure this is clearly set

out in your drought plan as well as any performance commitments you have chosen related to your use of temporary use restrictions.

As set out in section 4.2.2 of the Drought Plan guideline, you should consider what further actions you can take to reduce residential water use at any time of year, including implementing temporary use restrictions, as drought can occur across more than one season/year and can be quick or slow onset. You should also look at what further innovative demand actions you can implement to help your residential customers to significantly reduce their domestic water use when other actions, such as temporary use restrictions, are not achieving the desired reduction.

Section 4.2.2 of the Drought Plan guideline sets out that when including further demand actions in your plan, you should:

- identify from what drought level you would implement the further demand actions
- consider if there is any impact on your drought levels of service
- ensure you could implement actions at any time of the year
- consider how these actions could be both fast tracked and scaled up as a drought worsens
- identify ways to monitor any changes in residential demand that result from these further demand actions in order to understand their effectiveness across all residential groups and explain how you will share this with your customers

#### Working with NAV companies during a drought

The number of NAV companies and the proportion of the population they serve is increasing. You should ensure you have a good understanding of which NAVs are operating in the Cambridge area and how you will engage with each company. As the NAV market is continually changing, you should ensure you are aware when new NAV companies begin operating in the Cambridge area and update your communication plan to include these companies. As stated by the Drought Plan guideline in section 2.1, you should consider holding pre-consultation discussions with NAVs. Holding these discussions early in the process will help ensure alignment of drought actions, including joint communication (section 2.2).

#### 2. Additional considerations

You should follow the water company drought plan guideline when preparing your draft drought plan. This will be available, along with the supporting guidance on the Environment Agency's external SharePoint site:  
<https://defra.sharepoint.com/:f:/r/sites/Community1339/Guidance/Drought%20plan%20guidance?csf=1&web=1&e=sJD3Rz>  
Please contact our mailbox if you need access to this site or would like to request copies of the guidance: Water-Company-Plan@environment-agency.gov.uk.

	<p>You should also consider all relevant statutory requirements including the latest Drought Plan (England) Direction and the government's letter to you on its expectations for drought planning when issued. You should consider any lessons learned from any recent experience of dry weather, along with any relevant lessons from other companies. We encourage you to consult with a range of statutory and non-statutory stakeholders at this drought plan pre-consultation stage, including your customers, neighbouring water companies, NAVs, water retailers, environmental NGOs, Wildlife Trusts, local community, and catchment groups. We recommend engaging with Natural England regarding your environmental assessment report, monitoring plan and SEA. Please ensure you prepare the environmental assessment reports you need for your drought plan early enough to allow adequate time for you to consult with regulators and for their review. We would also encourage you to further develop your understanding of water quality issues your system may experience during times of drought. And consider the environmental water quality risks and drinking water quality risks in your drought plan.</p> <p>3. Pre-consultation letter questions Our response to the specific questions you raised in your pre-consultation letter are below. You requested views on: The role of regional groups in drought management. Since your last drought plan, regional water resources groups have played increasingly important roles in water company water resources planning. We expect you to work with your neighbouring water companies and the regional groups that you are a member of to identify opportunities to collaborate and align your drought plans where possible. We expect your drought plan to align with the regional group's 'statement of intent' which will set out the role that the regional group will take in drought. Further details on our expectations regarding the statement of intent will be included in National Framework 2.0.</p> <p>Your drought plan should include details on how you will share water with your neighbouring water companies, how you will operate sources to benefit other water users and the environment whilst minimising risk to your supplies, and any joint communication or actions, including monitoring, reporting and mitigation actions, you plan to undertake during a drought. You may wish to consider and develop triggers based on the situation of neighbouring water companies, members of your regional groups and other sectors or the environment that are under drought stress.</p>	
<p>Natural England</p>	<p>Habitats Regulations Assessment A water company is a competent authority under Regulation 7(1) of the Conservation of Habitats and Species Regulations 2017 as amended (referred to as the Habitats Regulations). Under Regulation 9(3) a competent authority, in exercising any of its functions, must have regard to the requirements of the</p>	

Habitats Directive so far as they may be affected by the exercise of those functions.

Cambridge Water must ensure that its drought plan meets the requirements of the Habitats Regulations and, if necessary, must undertake a Habitats Regulations Assessment (HRA) on the effects of the drought plan (including any supply-side drought management options) on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, alone or in combination with other plans. The HRA should be a clearly distinguishable document or section of the plan.

#### Strategic Environmental Assessment (SEA)

Please note that where specific drought management actions (including drought permits and orders) in a drought plan are assessed as likely to have a significant effect on a Habitats Directive site, the plan will require an SEA under Article 3.2(b) of the SEA Directive.

If an assessment is required, Natural England would like to see the in combination and cumulative assessment linked both to the water company WRMP proposals and to drought plans of other companies where they could affect the same environmental receptor.

Sites of Special Scientific Interest (SSSIs) and biodiversity Section 28G of the Wildlife and Countryside Act 1981 (as amended by 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.

#### Natural Environment and Rural Communities (NERC) Act and the Environment Act 2021

In addition, under Section 40 of the Natural Environment and Rural Communities Act 2006, every public authority, including water companies, must in exercising 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.

The Environment Act 2021 amends and strengthens this duty, requiring public authorities, including water companies, to “further, so far as is consistent with the proper exercise of their functions, the conservation and enhancement of biodiversity”, reflecting the aim of restoring or enhancing a species population or habitat.

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	<p>Government guidance (Complying with the biodiversity duty - GOV.UK) sets out information for public authorities to understand what the biodiversity duty is and how to meet it when carrying out all activities.</p> <p>Prioritisation of drought actions Any proposed drought action affecting a designated site should be properly justified. Such actions should only be proposed where there is a considerable risk to water supply from significant and infrequent drought events and should not represent routine responses to relatively frequent water shortages. Reasonable steps to reduce water demand should be taken before drought actions are carried out.</p> <p>Actions with a high environmental risk (as identified through the HRA, SEA and Environmental Assessment Reports) should be selected only as a last resort. The level of risk will be determined by the:</p> <ul style="list-style-type: none"> <li>• sensitivity of the site(s) affected</li> <li>• extent of the impact</li> <li>• availability of mitigation options.</li> </ul> <p>We would be pleased to support Cambridge Water in the development of its Drought Management Plan and the associated environmental assessments through Natural England's Discretionary Advice Service (DAS). Further information on this chargeable service can be found here: <a href="#">Developers: get environmental advice on your planning proposals - GOV.UK</a></p>	
Anglian Water	<p>Thank you for inviting us to provide views on your current DP as well as the areas you are looking to develop for your new Plan.</p> <p>We are keen to continue working together on our respective Plans and we have picked out some areas of focus below:</p> <ul style="list-style-type: none"> <li>• Aligning on triggers, actions, comms and levels of service in relation to neighbouring resources where appropriate</li> <li>• Aligning on bulk supply agreement text and operation</li> <li>• Ensuring impacts from any appropriate Cambridge Water drought permits, drought orders or extreme actions are shared with Anglian so that they can be filtered into our Plan</li> <li>• Deciding how best to include WRE's statement of intent in our respective plans</li> <li>• Sharing Drought Planning best practice including developing environmental triggers</li> </ul>	
Ofwat	No Comment	

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Essex and Suffolk Water	No Comment	
Cambridge County Council	<p>Given that the rainfall in our area is the lowest in the country, we recognise the importance of appropriately preparing for drought. This is compounded by climate change, with the latest Climate Change Risk Assessment for the Fens indicating that the probability of drought in the Fens is projected to increase with the main driver being evapotranspiration due to projected higher temperatures. The report goes on to indicate that the project number of months in severe drought in a 30 year period could be as high as 68.9 with a 3°C increase in temperature.</p> <p>The next iteration of drought plan should consider this projected increase in drought frequency and duration, considering how the triggers should be adjusted to take account of this. As well as the impact on availability of drinking water, the drought plan should consider the impacts (and mitigation) of drought on agriculture and biodiversity.</p> <p>The updated plan should also clearly link with the Environment Agency's 'Drought: how it is managed in England' document as well as neighbouring drought plans such as Anglian Water.</p>	
Cam Valley Forum	<p>In relation to the specific points that the Drought Plan will cover, we have the following comments.</p> <p>1. A full review of the current plan to ensure that it meets the latest EA guidance on drought planning, legislation on drought, and aligns with the latest draft WEMP and meets the Government expectations for water company drought plans.</p> <p>We are pleased to see that you will be ensuring that the plan meets the latest EA guidance. We note that the EA is currently consulting on the guidelines that water companies in England must follow when preparing their new drought plans. We are pleased to see the following statement on the EA public consultation website:</p> <p>We expect water companies' drought plans to show how they will do more to protect the environment. We received a number of responses to our 2019 consultation of the drought plan guideline asking for better protection for chalk streams. For this guideline update, we have included further information on the use of environmental triggers for environmentally sensitive sites and in particular providing the examples of chalk and greensand rivers.</p> <p>We hope that Cambridge Water will take full note of this.</p> <p>2. Further development of Environmental indicators and triggers to ensure that we can take appropriate measures earlier in a drought or emerging drought to protect the</p>	

environment and work with stakeholders and customers to do so.

The recent experience with the 2023 drought, when several of our chalk streams ran dry, revealed that Cambridge Water has not been introducing drought measures soon enough. We have discussed this on several occasions with you and trust that you will be taking note of our recommendations.

3. Review and development of improved drought triggers utilising a wider range of data sources and standardised indices to drought.

We have already commented, in past communications, on the urgent need to improve your drought triggers and bring these up to date with the current climatic situation, and urge you to give real thought to the development of new triggers. There can be no excuse for being unprepared for the next summer drought.

4. Review the drought measures in our plan and the timing for implementation, the need for any drought permits, including identification of potential options that could be applied in an extreme drought event not previously experienced.

Our comments to points 2 and 3 apply equally to this point.

5. A review of current Levels of service for the introduction of TUBs on certain water use activities – these are currently a return period on average of 1 in 20 years, whereas other companies in the eastern region have 1 in 10 years, and alignment within the region may be appropriate.

As you know, we have been campaigning for some time for Temporary Use Bans (TUBs) when evidence shows that a summer drought is impending. Due to the Cambridge area being exceptionally water-stressed, we believe there are particularly pressing reasons for the early introduction of TUBs and consider that it is essential that you move to a return period on average of 1 in 10 years at minimum, rather than the previous 1 in 20 years.

Much more needs to be done to reduce the demand for water during summer months. We do not consider public awareness campaigns, such as 'Can for the Cam' and 'Yes We Cam', are an adequate alternative to TUBs. We are also aware of the questions, and EIR, that have been raised about the data behind the claim that the recent campaign saved large quantities of water through the use of watering cans rather than hoses in gardens. We look forward to seeing the full explanation of this, but nevertheless believe that TUBs are a much more effective approach.

6. Undertake the appropriate level of environmental assessment of our drought options and the drought plan,

including Strategic Environmental Assessment (SEA) where applicable.

We agree that this is essential.

7. Scenario modelling of drought events including the 2022 drought event, and incorporation of any lessons learnt.

We agree this is essential

8. Update our communications plan.

We have been saying for some time that Cambridge Water's communications with the public is inadequate and this needs urgently addressing in the new plan. Although the last two summers have seen above average rainfall, this is no justification for the current half-hearted attempts to get customers to reduce their water consumption. In the case of TUBs, for example, the drought plan must have a strategy for making everyone aware that a TUB is being imposed. This should

involve working with all stakeholders, including CVF, and with the Councils and the press and media, to broadcast this. The reasons for a TUB needs to be made clear to everyone, and the steps that people and organisations should take to reduce the amount of mains water they are using need to be fully and constructively explained.

In addition, there should be a much greater focus on raising awareness of the many other ways of reducing water consumption. For example, over 6 months ago, CVF communicated with you about the quantity of water that is consumed by water softeners (often over 15 litres of water per person per day). Water softeners are harmful to the environment and seldom necessary, and yet your website still states only that 'Installing a water softener is a matter of personal choice.'

9. Ensure that in the development of our plans that we demonstrate how we will work with neighbouring water companies to align our plans and sharing of resources and drought options where necessary.

This is clearly essential, and much more attention should be paid to this in the new plan.

10. The EA would like to see the five regional water resources groups take a more prominent to reduce role in drought planning and management. WRE already organises regular Drought Group meetings to bring representatives together from across sectors to plan for and coordinate future drought events. We would be interested to hear your thoughts on how regional groups could play a greater role in drought management so that we can include a 'Statement of Intent'

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	<p>from the relevant regional group(s) in our 2027 Drought Plan. WRE is planning a webinar to discuss this in more detail in mid-January, with details to be publicised closer to the time.</p> <p>We communicate regularly with WRE, and have been involved in many discussions with them so far. We plan to participate in the forthcoming webinar to discuss this and are hoping that an appropriate 'Statement of intent' can not only be developed, but also acted on subsequently.</p> <p>11. Demonstrate how we will work with water retailers for non-household customers in our area of supply, and other New Appointment and Variation (NAV) organisations with their own domestic customers in our area of supply to develop clear and consistent drought communications</p> <p>This is a vital area of work and has unfortunately been overlooked previously. Water retailers for non-household customers must be brought into the discussions and take part in finding and implementing drought measures including solutions for the reduction of water consumption. You should be working with them so that non-domestic water consumption can be significantly reduced</p> <p>In conclusion, we urge that the Drought Plan refers to and acknowledges the particularly high rates of growth in Cambridge as a fundamental cause of over-abstraction from the chalk aquifer, particularly during the summer season and periods of low rainfall. We are fully aware of the mechanisms being proposed to address this (such as the water credits scheme) but, like many, we have little confidence in the effectiveness of many of the proposals. A good drought plan will be vital if we are to be prepared for the uncertainty of the future.</p>	
<p>Canal &amp; River Trust</p>	<p>The Trust is keen that any impacts on navigation across our 2000 mile network of canals and navigable rivers, including on our water resources such as reservoirs, licensed and exempt abstractions from surface or groundwater sources, that may arise through the implementation of Drought Plan options, are carefully considered and assessed in the development of options. The Trust will be happy to engage with you on discussing details and possible impacts, so that any draft Drought Permits or other drought measures can ideally be supported by the Trust, through the development of the Drought Plan and thereby avoid any challenge if the Drought Permits or options need to be implemented in the future.</p> <p>The Trust is also keen to explore, via the development of Drought Plan options, any opportunities to utilise our inland waterway network for potential water transfers (drought or otherwise) as well as more conjunctive schemes/options (e.g. utilising any available Trust sources such as reservoirs, where appropriate) to build longer term resilience to public water supplies. This is already taking place via the RAPID SRO process in some locations, and there is the wider Regional</p>	

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	<p>Water Resources Planning process underway, but specific Drought Plan options may require detailed consideration which we are happy to support.</p>	
<p>Cambridge City Council and South Cambridgeshire District Council</p>	<ul style="list-style-type: none"> <li>• We would welcome the greater involvement of Water Resources East and the other regional groups in drought planning and management. Drought is clearly a significant issue in the South East of England and needs a coordinated approach.</li> <li>• Cambridge Water should also engage with the Cambridge Water Scarcity Group throughout the development of the Drought Management Plan.</li> <li>• In addition to the Water Resources Management Plan, the development of the updated Drought Management Plan is a good opportunity to help shape the future demand management journey for Cambridge Water.</li> <li>• The updated Drought Management Plan should be informed by the sensitivity modelling of different abstraction points and the impact on particular watercourses that is informing the final WRMP.</li> <li>• The updated Drought Management Plan should also be informed by the Fens Climate Change Risk Assessment which predicts that there could be a 2 degree rise in temperature between the 2030s and 2050s if high CO2 emissions continue as predicted. Climate change will bring about more extreme weather events including severe droughts.</li> <li>• Please consider whether further detail should be contained in the Drought Plan about the augmentation schemes on some of the watercourses, including the triggers that are used. This would enable the public to see when difficult decisions are being made in trading-off between ecology and water for public supply during times of drought. Will these augmentation schemes be necessary in the future when abstractions licences are significantly reduced moving towards an environmental destination at 2040?</li> <li>• Agree that further consideration should be given to when measures such as Temporary Use Bans (TUBs) come in to force. Your letter talks about a level of service for TUBs currently being 1 in 20 years, but that other companies in the eastern region have 1 in 10 years. Further information needs to be provided on how this relates to environmental protection. Lessons need to be learnt from the drought of 2022, when streams were drying up, and the media and public were asking questions as to why action was not being taken by Cambridge Water.</li> <li>• In the existing Drought Management Plan a lot of the early stages in managing a drought are about communication with the public about the problem and trying to change behaviour. It is key that this communication shows what the impacts to the environment could be because of the drought and how the public can help by reducing their use of water. This</li> </ul>	

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	<p>could include images of the plants and animals that live in the chalk streams and would be affected by the drought.</p> <ul style="list-style-type: none"> <li>• We would also encourage Cambridge Water to be proactive in times when there isn't a drought to continue to educate the public about what they can do to save water.</li> <li>• In line with the current Drought Plan a colour coded system to identify whether there is a drought and the severity of this is welcomed. However, this should be made much more prominent on the Cambridge Water website, as there isn't currently a link to this from the home page. This traffic light score could be linked to live, publicly accessible data from monitoring stations as a way of informing the public and promoting responsible water use.</li> </ul>	
Affinity Water	<p>I note we have one existing transfer from Cambridge Water at Hadstock and Linton. It is not a major transfer in terms of volume, however it would be good to understand if the operation of this transfer would likely change during a drought. At present our Drought Plan states that 'the availability of this transfer is not expected to change during a drought'. Please could you let us know if this is not the case, or if it would be worth having a discussion about this.</p>	
Historic Engalnd	<p>General comments in relation to planning for drought and the historic environment:</p> <p>The draft Drought Plan is of particular interest to Historic England for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The vulnerability of some heritage assets (designated and non-designated as set out in the National Planning Policy Framework) to drought, and the potential harm to, or loss of, significance as a result of changes to water catchment areas;</li> <li>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;</li> <li>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;</li> <li>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;</li> </ol>	

5. The potential for unrecorded deeply buried and water-logged archaeology within the 'natural' floodplain/estuarine/coastal deposit sequence;
6. The opportunities for conserving and enhancing heritage assets as part of an integrated approach to water, this includes sustaining and enhancing the local character and distinctiveness of historic townscapes and landscapes;

Historic England advises that you consider each of the above to inform an appropriate and positive response to the conservation and enhancement of historic environment in your Plan.

#### Evidence gathering

We recommend using the [National Heritage List for England \(NHLE\)](#) for nationally designated heritage assets. Details of Conservation Areas (which are also designated heritage assets) can be found from Local Authorities. Please also consult the Historic Environment Records which are maintained and managed by local authorities.

In order to understand the potential impacts/risks to the historic environment, Historic England also recommends the collection and assessment of specific baseline information. This could include identifying the potential for buried, waterlogged archaeological and palaeoenvironmental remains of significant interest and fragility that can be associated with river valleys, floodplains, estuaries, coastal and wetland areas, including mires, bogs, peatland and water meadows. In particular this exercise should take account of areas of archaeological importance and the potential for unrecorded archaeology and seek to establish the following:

- the significance of the archaeological remains. For example, waterlogged archaeology may be nationally important if it is well preserved, rare, of exceptional significance and evidence exists for it to be understood in terms of its contemporary landscape context
- its condition, the burial environment and state of preservation. For example, are the archaeological remains preserved through waterlogging?.
- the likely impact of development activity (e.g. potential removal or dewatering from the proposed scheme that may impact the preservation of nearby archaeology) on that significance and state of preservation. For example, it may be necessary to investigate the local water environment and how this may be affected by any of the proposed works (see Historic England 2016 [Pre-serving Archaeological Remains](#)).

It is important to note that archaeology can be deeply buried and/or buried by deposits such as peat and alluvium, which can mask archaeological remains. In these cases, standard evaluation approaches (e.g. some geophysical techniques) may not be able to identify archaeological remains and so alternative approaches may be needed (e.g. geoarchaeology [geoarchaeology](#) and deposit modelling [deposit modelling](#), increased use of evaluation excavations etc.).

Although it may be appropriate for this evidence gathering and assessment to take place at the more detailed design/application stage, it is important to raise these issues and signpost how they might (further down the line) be tackled in relation to physical infrastructure interventions.

Please note also that in order to take account of unrecorded and non-designated archaeology, the relevant Historic Environment Record should be referred to, and the views of local authority archaeological advisers sought.

Further research relating to drought

We also refer you to a recent research project that you may already be aware of. It was a research council funded project on drought issues. It was led by Professor Lindsey McEwen (Director: Centre for Water, Communities and Resilience), Department of Geography and Environmental Management, University of the West of England. It was called 'DRY' which stands for 'Drought risks and you'. The web site is <http://dryproject.co.uk/> The aim of the project was to build a better picture of drought risk and coping with drought. This may be helpful to you as you develop the Plan.

Specific Feedback on the previous Drought Management Plan

There is very little mention of heritage assets and their settings or the historic environment throughout the Plan. The only reference is at section 6.2 which states that 'We do not consider that our actions in this plan would impact on cultural or heritage sites'. However, we consider that the drought Plan does have the potential to impact on heritage assets for the reasons set out in this letter. Therefore, in the next Drought Plan, reference should be made to historic environment issues outlined above.

The current Plan is very focussed on impacts on customers and also the natural environment. Some consideration should also be given to impacts on the historic environment in drought scenarios in the new Plan.

Heritage assets may be at risk of harm through drought events. We list some examples of ways in which heritage assets could be at risk below:

- A listed watermill that relies on the flow of water could be at risk
- A registered park and gardens with water features could be at risk
- A scheduled monument that has been designated because of the importance of the presence of internationally important waterlogged archaeology could also be at risk
- Drought can harm plants that make up designed and historic landscapes
- Drought can affect archaeological deposits, in particular waterlogged deposits, affect the stability of buildings and other structures
- Desiccation of wetlands can have a dramatic effect on the preservation of waterlogged archaeological and palaeo-environmental material
- The drying out of certain geologies (for example, clay) can affect ground stability and increase subsidence affecting historic structures and affecting archaeological sites. It can also lead to increased erosion
- Preservation (in the ground) will become increasingly difficult as these damaging cycles create stressful environments for buried archaeology, see our guidance on [Preserving Archaeological Remains](#). (2016)

The question is therefore what could and should be done in a drought situation to reduce impacts on the historic environment. The strategies to seek to minimise impacts on the historic environment should be set out in the Drought Plan.

Consideration should be given to long-term predicted changes to climate in cumulative impacts or when modelling risk to understand impacts. Effects of drought (e.g. soil cracking, reduced vegetation, increased risk of wildfires) can magnify secondary impacts (e.g. erosion) when severe storms/rain hit after a period of drought. These extreme events are becoming more frequent.

Works affecting site hydrology may increase a site's vulnerability to predicted climate impacts. Conversely, measures to control affected areas could improve landscape resilience, so their plans may have positive outcomes. If possible, cumulative impacts should consider those beyond the immediate effects of any plans. This will obviously include a level of uncertainty, but it would be good to see that changes to rain patterns have been considered as part of a wider climatic system.

	<p>Historic England should also be included as a main consultee where environmental triggers that affect the historic environment are likely to be impacted by the drought plans. Specifically, page 21 of the draft Water Company drought Plan guidance states that 'Your plan should show how you have thought to identify if and where you can help to minimise the possible environmental effects of dry weather. For example, you may plan to adjust your operations to alleviate environmental stress on sites you know are sensitive to dry weather, whilst minimising the risk to your supplies. This should include heritage sites that are sensitive to dry weather.</p> <p>Specific comments on pre-consultation letter</p> <p>We welcome the commitment to ensure the Drought Plan aligns with the WRMP. We welcome reference to the protection of the environment in the second bullet point. This should include the historic environment. We welcome the commitment to carry out environmental assessment as part of the SEA process (bullet point 6). However, we would highlight the importance of considering the historic environment both within the SEA process but also within the Plan itself. We assume you will be contacting us separately about the SEA Scoping Report. We also welcome the proposal for regional Water Resources Groups to play a greater role in the coordination and ensuring consistency in drought planning at a more strategic level. We hope to attend the WRE webinar later this month.</p> <p>In the course of your operations, we recommend that you consult the Historic Environment Records held at each County Council and seek the necessary advice from the relevant county archaeologists and local authority conservation officers to ensure that impacts on heritage assets are avoided or, where this is not possible, mitigated. Harm cannot always be mitigated and as such works may not be acceptable.</p> <p>Closing comments</p> <p>Finally, we should like to stress that this opinion is based on the information provided by you in this consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. If you have any questions, please do get back to me. In the meantime, we look forward to continuing to work with you.</p>	
<p>Hobson's Conduit Trust</p>	<p>p3 Para 4 Whilst we accept that droughts are naturally occurring events, it is absolutely clear to us that the effects of any period of drought are exacerbated in the Cambridge Water supply area by over-abstraction from the aquifer (also p 4 1.1).</p>	

We therefore welcome all efforts to increase the availability of water transfer e.g. from Anglian Water's Grafham Water reservoir. We underline the great urgency of proceeding towards capturing and activating this and other measures that will ease the pressure on Cambridge Water's groundwater sources.

p3 Para 5 We welcome prioritisation of demand saving measures over those that would take more water from the environment.

p6 Para 1 and 2 We welcome the acceptance that not all existing abstractions are sustainable over the long term, and the commitment to prioritise environmental impacts in making your plans. We would like to see an 'environment first' emphasis throughout your programme.

p9 Environmental Stress triggers We welcome this stage in the drought response.

p9 Drought Trigger 1 We do not believe that reduction of support flows at this trigger level is appropriate. Instead we believe that Temporary User Bans (TUBs) should be brought in at this Trigger Level, so as to oblige consumers to take steps to reduce their optional uses in order that support flows can be prioritised and maintained. In other words, we would favour putting the protection of the environment at a higher priority than continuing to allow e.g. domestic hosepipe use.

p10 Drought Trigger 2 It is, we feel, wrong that in this scenario TUBs are only to be 'considered'. They should be implemented without demur, and we believe that they should have been implemented at Stage 1 as indicated above.

p11 The comments above also apply to Table 1 on page 11, notably in relation to the introduction of TUBs. We welcome the reduction proposed to abstraction at environmentally sensitive sites.

We question whether enhanced leakage reduction is given enough priority, especially under 'Business as Usual'. Taking such measures at a time of drought is we feel a real case of a gesture that is too little too late.

Surely leakage reduction should receive far greater emphasis and priority at all times. This would ease drought challenges, but would also have many other positive impacts not least by reducing the ongoing abstraction requirement or helping to cope with ever-increasing regular consumer demand.

p14 Figure 3 We believe that TUBs should be implemented far sooner as a matter of policy.

p16 Para 1 We query why you seek to impose the least impact on customers where possible. We feel that this is the wrong policy and a very poor approach psychologically. We believe that customers need to appreciate more immediately that water is a finite resource, especially in the Cambridge Water area, and most particularly when drought is anticipated or upon us. The reluctance to deploy TUBs is we think lamentable, rather than a virtue.

p16 Paras 2 and 3 3.2.1 As retail customers of Cambridge Water ourselves we do not believe that enough effort is made by Cambridge Water in terms of publicity and public engagement. Appeals for restraint need to be more frequent, pervasive, direct and clear, and implemented sooner as the scenarios unfold.

3.2.2 We believe that there is much greater scope to prioritise leakage reduction at all times under BAU, as indicated above.

p17 3.2.4 and 3.2.5 We suggest that the appeals for restraint would be much more effective if combined with early triggering of TUBs, and that your published service level of 'not more than one in 20 years' creates a greater potential for consequent damage to the environment.

p18 3.2.7 We believe that the lead time and procedures for implementing TUBs should be shortened.

3.2.8 We contend that the communication methods and media that you adopt need to be reviewed and updated to achieve far greater penetration and immediacy of impact. We consider that the approach at present is too narrow and passive.

p19 3.2.10 We believe that your service levels should encompass contemplating Non Essential Use Bans (NEUBs) more frequently than one every 50 years maximum.

P23 3.3.2 Bulk Transfers We question the adequacy of import arrangements and whether any export arrangements at all can possibly be appropriate given the environmental consequences of abstraction.

p25 We doubt the wisdom of having a significant supply contract with a commercial customer outside the Cambridge Water supply area for the same reason.

p23 3.3.3 We do not support the use of temporary drought permits to provide additional supplies since these are we feel very likely to involve more abstraction from the already over-stressed aquifer and will result in further environmental damage. What is clearly needed most urgently is a range of adequate additional bulk supplies from better resourced water companies, such as Anglian Water. (3.3.2)

	<p>We consider that regional supply options are far preferable to drought permits that would increase stress on the aquifer.</p> <p>p31 Table 4 Compensation flow reductions: Linton, Rivel, Babraham We do not support these proposed temporary removals of licence conditions, and we strongly protest that ‘Moderate’ is not the appropriate description for the impact re Babraham, for the reasons that we indicated at the outset of this letter.</p> <p>p35 As indicated above we believe that a much more proactive approach to communication is required even above Level 1 including the actual, threatened, precautionary or predicted use of TUBs.</p> <p>p37 We believe that the final paragraph of page 37 and the first half of page 38 and the Appendix (n.b. E not D) have a tone that is somewhat complacent and that they under-state and fail to recognise the seriousness of the potential impacts of increasing abstraction.</p> <p>Appendix E Table 1.1 The negative impact of increasing abstraction at Babraham is far more than the stated ‘Amenity at Nine Wells’. The whole of Hobson’s Brook and Conduit and their ecosystem and habitats would be severely threatened as would our own ability to supply the lakes in the Botanic Garden and Emmanuel College gardens (both Listed), who would be likely to turn to mains water supply as a replacement.</p> <p>3.5 We question whether the gauge at Nine Wells works effectively even outside drought conditions.</p> <p>3.6 We contend that these paragraphs do not adequately deal with or respond to the environmental threats from increasing abstraction with sufficient urgency or determination.</p>	
<p>Wilbraham River Protection Society</p>	<p>1. Use of unreliable WRMP19 Data</p> <p>The recent OFWAT regulatory letter indicated that many of the projected supply side and other targets identified in WRMP19 had not been achieved. The data from WRMP19 was extensively used in the 2021 drought plans – and with hindsight some of these assumptions are clearly incorrect. In a new drought plan it is expected that a more accurate set of assumptions will be available – or a procedure to update the relevant data during the 5 year period is employed. Alternatively, the drought plans should be fully revised in the event the WRMP targets and other assumptions are failing to be achieved during the 5 year period. This is particularly important in the face of growth pressure in the Cambridge area which, despite the WRMP plans and the development of “water credits” and real supply side developments, may well create significant increases in the demand side – not fully accounted for in the WRMP or the drought plan.</p>	

## 2. Lack of mandatory water metering

This is an issue for the WRMP but obviously has an impact on drought scenarios. Over the last 5 years the percentage of metered customers went from 70 to 74% - many in new built houses. The current WRMP draft is aiming for a target of universal metering by 2035 but is caveated by many factors. We question whether based on current performance the 2035 target is realistic. We consider that failure to prioritise this is a major failing in CWC's planning in the face of short term growth pressures in the Cambridge area, climate change, and increased environmental awareness. Mandatory water metering would support reduced demand in times of drought and allow several other efficiency benefits as spelt out in WRMP2024.

## 3. Inappropriate Trigger Levels

Appendix C details the trigger level methodology and outlines the management of previous droughts. It is notable that in the 1988-93 drought sequence a TUB was imposed. Reviewing the subsequent sequences of 1995-1998 and 2003-2007 it is clear that despite reaching very similar trigger levels – e.g. RWL and Recharge Deficit – no TUBs were imposed. We are concerned that the trigger levels are too insensitive and should be revised to allow the use of TUBs at an earlier stage. In both later droughts the surrounding water suppliers did impose TUBs.

We understand that CWC consider that TUBs are reputationally damaging. We would like to make clear that the negative publicity from the environmental damage caused by allowing further reduction in groundwater levels may cause equivalent or worse reputational damage in future

## 4. Lack of Environmental Indicators for Triggers

It is notable that there appear to be no environmental indicators used as an input to actual decision making on drought management. We suggest that this is now inappropriate in a water stressed area, with total reliance on aquifer abstraction for public water supply, and consideration should be given to including these in future plans.

## 5. Reliance on Augmentation Schemes and WFD monitoring for Environmental Mitigation

Appendix E addresses environmental assessment and tabulates the mitigations and monitoring employed to protect surface water bodies in the event of drought related actions such as increased abstraction. There is widespread reliance on augmentation schemes as mitigations, however the EA have stated that augmentation schemes are not designed for river support in drought conditions so this seems inappropriate. The tables indicate the monitoring utilises mainly the EA maintained WFD

	<p>monitoring – recently heavily criticised by the Office of Environmental Protection as inadequate. In the case of our chalk stream labelled as Quy Water-Bottisham Lode there is an assumption it is “not flow dependent” – because it is augmented – so its flow status is ignored. We dispute this assumption and EA groundwater modelling has clearly demonstrated the impact of current local PWS abstraction which reduces the groundwater levels at both springheads by approximately 3 metres. In addition, the WFD monitoring point (Lode) used in the table does not accurately reflect the state of the majority of the catchment. This is because flow is maintained at the WFD point by a tributary (Black Ditch) which is always in water owing to continuous effluent discharge from Teversham Waste Water Treatment Plant. Given the increasing environmental concern related to over-abstraction in non-drought conditions a future drought plan should provide more convincing and appropriate surface water body monitoring proposals. It should take into account the failings of the current WFD monitoring and use or develop other monitoring measures – perhaps with the assistance of local river groups.</p> <p>6. Lack of a Strategic Environmental Assessment</p> <p>In the 2021 plan the need for an SEA was deemed unnecessary. We believe this was wrong. It is notable that adjacent water companies did carry out SEAs in their contemporary drought plans. Given the recent (2024) EA paper on “Baseline data of risk of deterioration to water bodies from water abstraction” which clearly demonstrates the widespread negative effects on the Cam catchment surface water bodies we expect an SEA will definitely be included in the next CWC drought plan – not just considered “where applicable”.</p> <p>7. Lack of Climate Change Planning</p> <p>The current plan understandably largely uses historical data. It does discuss the management of recent shorter term drought and dry periods and suggests that these can be managed through the WRMP. We consider that a future drought plan should consider more carefully the effect of short term severe weather events and how this may impact water supplies and the environment.</p>	
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## 2.2 Consultation on the Draft Plan

We will publish our draft plan to Defra by the 31<sup>st</sup> of March 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

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

Cambridge Water  
Draft drought plan 2026

London

SW1P 4DF

Or by E-mail to [water.resources@defra.gsi.gov.uk](mailto: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.