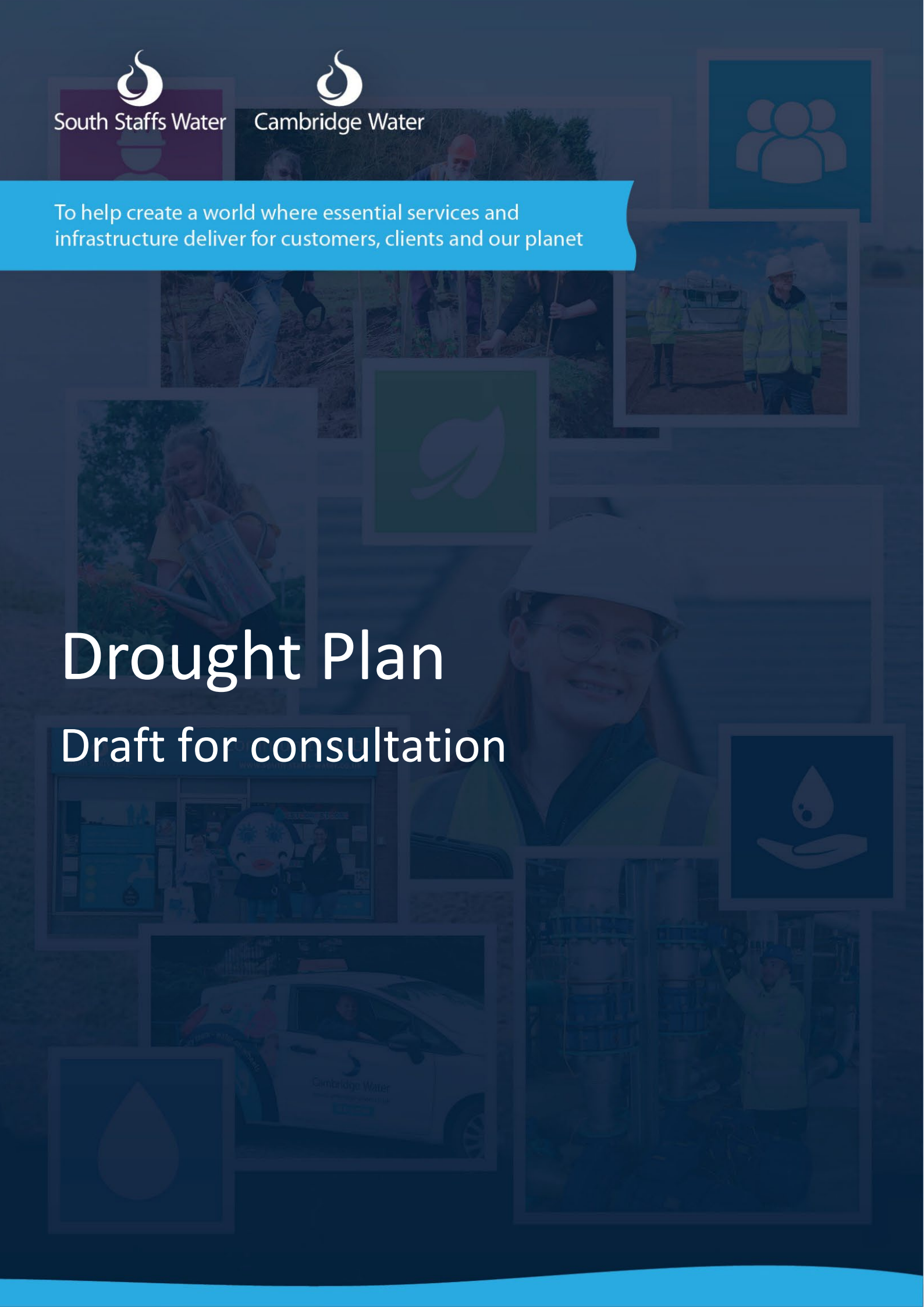
South Staffs Water Cambridge Water

To help create a world where essential services and infrastructure deliver for customers, clients and our planet



Drought Plan

Draft for consultation

Contents

1. Introduction

This section explains why we produce a drought plan, what it includes and the statutory process that we follow to produce and update our plans. It also provides an overview of our supply area, and the consultation that we carry out when producing and updating our plan.

1.1 Overview of the drought planning process

A drought is a naturally occurring event resulting from less than expected rainfall over a prolonged period, and every drought is different. Droughts can impact the environment, business, and water supplies. This drought plan sets out the actions we will take before, during and after periods of extended dry weather. It describes how we will monitor and manage both supply- and demand-side options to maintain water supplies. We have tested this plan against droughts of different duration and severity, to ensure it is robust across multiple drought scenarios.

We published our last drought plan in 2021, in accordance with the latest published guidance from the Environment Agency and Government Directions. This plan was approved by the Secretary of State for Environment, Food and Rural Affairs and we have now reached the minimum required period for updating our plan, which is every 5 years.

In preparing this drought plan, we have consulted with regulators, local stakeholders, and neighbouring water companies, as well as with the Environment Agency.

This drought plan acts as an operational framework that sets out how we will manage the risks posed by drought conditions and is reviewed annually by the water resources team to understand any key changes to the elements included within the plan, such as our drought triggers, drought actions, monitoring, communications strategy and business as usual or normal conditions. This ensures that we identify any changes that could affect the implementation of the plan in a drought. We will also review the detail following any dry weather or peak demand events out of the ordinary and revise the plan where appropriate. We will discuss any changes necessary with the EA, and if any changes required are deemed to be a material change in circumstances, then we will submit a revised plan to Defra, for publication and consultation.

When publishing our drought plan, we are required to exclude any matters of commercial confidentiality and any material that is contrary to interests of national security. We can confirm this plan does not contain any commercially confidential information. An accompanying statement from our Security Manager demonstrates that this plan has also been assessed against Security & Emergency measures Directive (SEMD) and contains no information on national security.

1.2 About the Cambridge Water supply area

Cambridge Water is incorporated with South Staffs Water, and so we operate in two areas of the UK. We have produced separate plans for our South Staffs Water and Cambridge Water regions. This is because of the geographically separate nature of our supply areas.

In the Cambridge region we supply wholesome potable water to a population of 370,000 in South Cambridgeshire and part of Huntingdonshire. The supply area is shown in figure 1 below.

The Southeast of the UK and the Cambridge region faces several challenges into the future, such as climate change, population and housing growth, and the development of new supply resources to meet the needs of the environment and changing weather patterns. We have been designated an area of water stress because of these, highlighting the need for us to manage our supplies and to continue to always maintain a reliable supply of water to our customers, including in droughts, in the most sustainable way and minimising any impacts on the environment.

We abstract our supplies from groundwater and typically supply an average of 86 million litres of water a day (Ml/d) to our customers. During periods of peak demand, such as the hot, dry summers of 2018 and 2022, this can increase by up to 20-25%. As most of this groundwater is abstracted from the chalk aquifer, we also need to be mindful of the impact this can have on the precious chalk streams in our region.

Figure 1 Area of supply and drought management area

We have a single water resources zone (WRZ) and the supply areas within this zone are highly integrated, allowing for transfer of water around the zone. At present we have only a small number of cross border transfers to and from neighbouring water companies, these directly supply small areas of customers, and are demand based and not source constrained.

1.3 Links to other plans and the WRMP

Our current WRMP, which is available on our website, includes details of our forecast resources position over 25 years and demonstrates the ways in which we plan to meet the demand for water over that period. It also demonstrates that deployable output exceeds dry year average daily demands and that we can maintain security of supply for our customers under normal conditions. In addition, projected peak demands for the critical period of a 'peak week' over the planning period can also be met with available peak deployable output.

We operate in one of the driest and fastest growing regions in the UK, and significant future housing growth is planned in the coming years. We also acknowledge that not all existing abstractions are sustainable over the long term and may already impact river flows. We are committed to addressing these longer-term planning issues through our WRMP, which includes significant supply and demand measures to meet these needs.

In developing this drought plan, we have had due regard to other plans, including neighbouring water companies' plans, regional plans, our WRMP, and the Environment Agency drought plans.

Regional Planning

As a core member of Water Resources East (WRE), we can identify and progress options to ensure that the region is resilient to future drought and climate change. In addition, we are investigating any abstractions that may impact the environment through the Water Industry National Environment Programme (WINEP).

WRE also provides a forum for us and our neighbouring water companies to ensure consistency across the region in our approach to managing droughts. Collectively the member companies of WRE have published a WRE statement of intent for drought, which states how the regional communications and updates would be coordinated during a drought, when companies may be at different stages in their own drought triggers and actions.

One of our key aims is to produce consistent customer messaging – for example, taking an aligned approach to temporary use ban (TUB) notices- and where practicable, further alignment of drought measures. Working closely with the regional water companies, the Environment Agency and other stakeholders is fundamental to this.

Regional Statement of Intent Summary

The Environment Agency's Water Resources National Framework (WRNF25) published in June 2025 sets an expectation for regional groups to develop a drought Statement of Intent that clearly explains the role they will take in drought planning and management. As such, WRE's Statement of Intent:

- Outlines the Terms of Reference of the WRE Drought Group.
- Sets out the actions the WRE Drought Group will take in a drought, and what falls outside our role.
- Demonstrates a commitment to ensure a good representation of all sectors, including water companies, internal drainage boards, agriculture and horticulture, energy, industry, and amenity stakeholders in a drought scenario.
- Aligns with other regional groups, existing drought governance, and drought planning arrangements.
- Will be reviewed and signed off annually by the WRE Drought Group.

Formed in response to the 2022 drought, the WRE Drought Group was established to facilitate opportunities for improved communication and drought management across sectors, seeking to both provide support for abstractors and protect the environment during periods of dry weather across the region.

The WRE Drought Group aims to improve East Anglia's resilience to drought across all sectors. It seeks to facilitate knowledge sharing and improve understanding of water and drought management across our members. It supports our members to plan for drought and encourage alignment of drought responses and communications.

WRE's Drought Group focuses primarily on the catchments within the Environment Agency's East Anglia Area (Norfolk, Suffolk, Essex and Cambridgeshire) and the Lincolnshire, Bedfordshire, and Northamptonshire Area.

The WRE Drought Group will:

- Have a pan-sectoral focus across member organisations represented in the region.
- Enable increased visibility of areas of water stress across the region and members' dry weather and drought activities.
- Support and encourage all sectors to plan for drought, considering their risks, needs, and actions before, during and after a developing drought situation.
- Support alignment on members' drought plans across the region.
- Facilitate collaborative discussion within and between sectors to promote regional alignment on sharing water resources and implementing water use restrictions during drought.
- Identify and champion opportunities for improved water resources allocation and management across sectors, to explore ways to improve drought resilience and reduce the impact of drought conditions on key abstractors and the environment.

- Support WRE's wider efforts to work with the agricultural sector to develop local resilience options.
- Promote drought knowledge sharing through the WRE Drought Group meetings, drought webpage, and other channels as appropriate.
- Consider the needs of the environment, including water-dependent habitats and other sensitive environmental sites, in all drought management activities. The group commits to pursuing drought management options that protect and enhance the natural environment.
- Coordinate regional drought activities as outlined in the drought response framework.

The WRE Drought Group will not:

- Have a formal decision-making role nor is accountable for how water supplies and drought options are managed.
- Develop a regional Drought Plan, nor does it aim to override an organisation's own Drought Plans.
- Require members to fully align on activities. It will not require members to share information beyond a level they feel is appropriate for their organisation.
- Proactively engage in drought-related communications unless requested by one or more Drought Group members.

The full Statement of Intent, along with other drought material, can be found on WRE's website here: https://wre.org.uk/wp-content/uploads/2025/12/WRE-Drought-Group-Statement-of-Intent-Dec-2025-v2.pdf

Anglian Water and Affinity Water drought plans

During the pre-consultation for drought plans, we have consulted with neighbouring water companies in producing our respective drought plans to make alignments where practicable, for instance in imposing restrictions and communications during a drought. Due to the nature of our supply areas and resources, droughts can impact companies differently, so communication throughout an emerging drought situation is important, we do this with companies and through national and regional forums.

Environment Agency drought planning

The Environment Agency has published a drought plan for the East Anglia (Cambridgeshire & Bedfordshire) area which covers the catchments in which we operate.

We regularly exchange information ana data with the EA during a drought relating to supply demand and position and forecasting for public water supply. The frequency of data exchange and communications will increase as a drought progresses in severity.

The Environment Agency will also provide regional and national co-ordination of drought through monitoring, reports and advising during a drought on the impact on the environment, and they are responsible for certain environmental actions. Where possible our Drought Plan is aligned with the Environment Agency Drought Plans that outline how they work with sectors and stakeholders to manage drought impact.

Emergency Drought Plan

This plan will be complimented by an Emergency Drought Plan at Level 4, which is a new requirement to formalise our existing Emergency Plan capabilities for drought specific situations. The Environment Agency have provided guidance on how to produce these plans, and we will be producing our first draft in the summer of 2026.

1.4 Environmental Responsibilities

We are committed to ensuring our activities are fully assessed for any environmental impact and that these are minimised. We recognise that water supply abstractions can place additional stress on the water environment and habitats. Within our drought plan, we have prioritised actions to maintain public water supply so that have the least potential for environmental damage and implementing demand management actions first. We have also included monitoring plans and mitigation measures for the impact of any drought actions that we may need to take, where applicable. This is particularly important to us as East Anglia includes 58 rare chalk streams of which 85% globally are found in the UK, and these can be particularly sensitive to groundwater abstraction.

Abstraction conditions to protect the environment.

We have several licences where an existing known impact due to abstraction is mitigated by licence conditions to protect the environment. We have 3 sources with hands off flow conditions where we reduce or cease abstraction according to a river flow trigger, and one licence where we provide environmental support by augmentation when groundwater levels are low. These will often be in place before we reach a drought environmental stress trigger and continue through a drought.

Measures that we deliver through the Water industry national environment programme (WINEP), such as our programme of chalk stream restoration, will help ensure that the environment and habitats can be more resilient to droughts and low flow issues. This is complimented by licence abstraction reductions, and new supplies to replace these reductions that are being developed through our long-term water resources management plan and the regional plan.

Sustainability reductions

We have made several permanent reductions to licences in the periods preceding the publication of this drought plan to protect and prevent deterioration of the environment. Over the last 10 years this has amounted to over 7 million litres a day of water that we no longer abstract from the environment. We have also made a commitment to endeavour to maintain abstractions at all our sources at a level that would not lead to any risk of further deterioration of the environment, and for this to become a permanent change when we can replace these supplies with alternatives in 2032. We are also working with the environment agency and the regional groups to quantify further future reductions under the environmental destination principles outlined in our WRMP.

The aim of this plan is to demonstrate how we would manage resources and demand through several variable but plausible drought sequences, by implementing a range of management actions available to us. It does not set out to be prescriptive, as maintaining flexibility in the face of different circumstances is a key requirement. Instead, it presents a framework and timetable of actions to be considered through the types of drought sequences we might expect. This allows operational managers to make informed decisions and develop action plans in an effective manner.

1.5 Demand Management

Reducing leakage is one of our key operational priorities, and we have included stretching targets to reduce leakage further year on year in our WRMP. We seek to use new technologies wherever possible to improve our leakage position, and to renew failing mains assets with a targeted reduction of a further 2 million litres/day by 2030. During droughts, we recognise that shorter term reductions in leakage can be beneficial to the overall supply situation, and so this is a key action that we implement early on in a drought.

For AMP8 we are investing in universal metering, taking our current meter penetration from 76% to 95% or better. Not only will this help us identify more leaks and sooner, but it will support our ongoing water efficiency programme to reduce per capita consumption, and importantly in droughts, provide the basis for customers to understand their own use in the context of our communications to conserve water.

We also have a programme of targeted water efficiency for our non-household customers, and to replace non household meters with Smart meters to provide data to inform them on their water consumption.

1.6 Consultation on our draft drought plan

We are committed to engaging with all stakeholders who have an interest in this plan. Once the Secretary of State has given permission to publish our draft plan, there will be a ten week consultation period for key stakeholders to make their representations. We will then revise our plan as appropriate and produce and publish a statement of response to the comments we receive along with the revised draft plan by the end of October.

Stakeholders wishing to make representations, comments or raise questions on this draft plan should submit them to;

Defra
Water Company Drought Plan
Department for Environment Food and Rural Affairs
3rd Floor
2 Marsham Street
London SW1P 4DF
Alternatively, representations, comments and questions can be emailed to: water.resources@defra.gsi.gov.uk.

1.6.1 Pre-consultation

In accordance with the Environment Agency's drought plan guidance, we consulted with our statutory consultees before producing this draft plan to identify any issues of importance and for any comments that we should consider. Our pre-consultation ran from December 2025 to 10th January 2026. As part of this we explained the changes that we were planning to make and invited comments on these and invited other feedback.

We consulted with statutory consultees as well as other stakeholders, including neighbouring water companies and environmental groups and. We are also required to consult with any licensed water supplier that supplies water to premises in our area of operations through our supply system. There are currently inset variations appointed to Anglian Water, Integrated Water Networks Limited, and Icosa water services Ltd, these have been included in our consultation. Comments received during the pre-consultation are also set out in appendix A.

1.7 Types of drought

A drought is a naturally occurring event, and each drought sequence is different. We discuss some of the different types of droughts that have historically had some potential impact on water supply and required us to activate our drought plan and implement actions later in this document. Droughts have different severity, duration and timing and can occur in different ways and at different times regionally and nationally. Understanding historic events is valuable in planning for a range of possible future droughts.

Environmental Drought

When there is a shortage of rainfall, and often combined with above average temperatures, river flows are typically reduced and there is more reliance on groundwater to support environmental flows and other sectors such as agriculture. This can cause stress on habitats and wildlife due to lower flows, particularly when catchments may not be as naturally resilience to dry weather as they might naturally be. Groundwater levels would typically not be impacted, and water supplies for human consumption are not affected.

Agricultural Drought

This type of drought typically follows environmental drought, or is at the same time, where dry weather and lack of rainfall begins to both impact crop production and the access to water for irrigation, due to soil conditions and restrictions to surface water abstraction due to licence conditions under low flows. Again, there will be more reliance on groundwater and agricultural storage reservoirs.

Public Water Supply Drought

A drought that impacts on water resources occurs following a prolonged period of below average rainfall and can affect surface water and groundwater in different ways and over different timescales. Reservoirs can be impacted after many months of dry weather at any time of the year, whereas groundwater may only be impacted following multiple years of dry winter, when the aquifer is normally recharged. Therefore, different companies can be affected at different times depending on resources that they use, and also the position they were in preceding a drought, as well as localised catchment recharge effects. Water companies are required to plan for quite severe droughts that do not often occur due to the impact they can potentially have on the public. This planning involves numerous measures to ensure customers are only impacted in exceptional circumstances, although we also use the tools we have available to respond in all types of droughts, and monitor how drought conditions are progressing closely.

1.8 Lessons learnt from 2025

To strengthen the preparation of this plan we have undertaken our review of the 2025 drought; the actions that we implemented, and taken any lesson learnt from our drought response. In 2024-25 we experienced a dry winter, including the driest spring on record, followed by the hottest summer on record with several heatwaves. This caused increased customer demands and environmental stress, activating our drought plan, entering drought trigger Level 1 in July. With groundwater supplies resilient to a single dry winter, our concern was a second dry winter. However, 2025-26 was a wet winter with 150% of LTA rainfall, and by March the situation had returned to normal. As a result, there was no risk of temporary use ban in 2025.

Overall, our response effectively delivered some demand reductions and managed supply availability whilst protecting the environment. We minimised customer impacts while ensuring that there was no risk to customer supplies. The activation

of our drought response has identified what worked well, and led us to review and identify any improvements that could be made. The full report is included as Appendix F, and the summary recommendations are below.

These are the key actions we have identified that we need to continue in future droughts:

- Continue the close working of different departments, and clear communication between them.
- Convene the executive level team and run as incident mode at appropriate point in drought.
- Engage with customers through a range of methods to ensure broad reach.
- Continue to utilise the weekly EA update email to inform across the teams.
- Continue to be transparent on position and actions with stakeholders through meetings and forums.

After this review of the summer of 2025, we have created the following recommendations that will improve our response to a drought when it next occurs:

- Make customers aware off water saving strategies earlier in the year, so that they are not surprised when messaging ramps up during warmer months.
- Consider preparing of ‘off the shelf’ water efficiency tips to roll out to customers if appropriate.
- Increase the proportion of customers providing email addresses to enable a greater reach for future drought communications.
- Continue to work with the Environment Agency on how we can most efficiently communicate with them, and avoid meetings being repeated.
- Focus on ensuring we have maximum capacity available at start of spring/summer.

2. Drought triggers

This section provides information about how we monitor our water resources as part of our day-to-day activities, and how we use our triggers to monitor and forecast our water resource position and prospects during a drought. It also explains how our triggers have been validated against historical conditions during different droughts, and the various stages in a drought.

2.1 Monitoring of water resources

We continuously monitor various meteorological, environmental and water resources data to understand our supply position and any emerging drought conditions. These are incorporated into our drought indicators which inform our drought triggers at various stages of drought. They tell us when we should consider taking the various actions available to us during a drought, and when drought impacts will have ceased and a drought has ended. We have developed a drought monitoring dashboard which allows us to interrogate all the available data.

A key indicator is tracking groundwater levels at key sites across the area against long term average data to determine the status of water resources. These have been selected to represent the supply area and incorporate long term records with regular updated data. The monitoring network was last reviewed in 2025 to ensure it remains fit for purpose following lessons learned more recently and to maintain updated drought triggers. We now monitor five strategic observation boreholes over the area that supplies our water.

For this revised plan we have included enhanced climate monitoring. Lower rainfall than average will usually precede a drought, and so we monitor total rainfall against the long-term average record. To update our approach, we have also adopted widely used indices that show the cumulative impact of below average rainfall, the standardised precipitation index (SPI) and the standardised precipitation-evapotranspiration index (SPEI). These provide the magnitude or severity of a prolonged drier period than average, and the impact on soil moisture, river flows and recharge of groundwater.

While the groundwater can be resilient to shorter term droughts, environmental stress can occur before water resources impacts, this is usually because of lower river flows, which in the chalk aquifer can also be supported by base flow from groundwater. We have improved our approach to monitoring river flows as part of our environmental stress indicators by using long term modelled flows to inform a river flow index based on the standardised streamflow index (SSI), a commonly used drought metric. This allows our monitoring to incorporate triggers that represent low river flows more accurately.

This monitoring data is key developing our drought indicators and triggers, which are discussed in more detail later, and informs our drought status and the actions that we can take at each stage in a drought.

Our groundwater supply system

All our supplies are from groundwater, and are reliant on the recharge of the aquifer. Recharge occurs through the winter months when the rainfall is effective in infiltrating through the soil to the underground stores. Groundwater levels typically deplete during the summer and are replenished again during the winter when evapotranspiration is less due to lower temperatures. Several factors influence how effective recharge is and whether supplies are fully replenished or not. The amount of rainfall needs to be at or above average for the winter, without being of a high intensity where this can run-off away from the ground where it is required. The moisture levels of soil need to be such that the rainfall can seep through to recharge and is not taken up by plants and to saturate the ground. Several dry winters can begin to lower the water levels overall, leading to even lower levels during the summer when the normal recession of levels occurs. Groundwater supplies are more resilient to shorter term droughts as levels decline quite slowly, but longer duration droughts can have a significant impact as the groundwater can take a long time to fully recover.

2.2 Vulnerability to drought

We have assessed the vulnerability of our supply system to different types of drought events, the likely frequency of drought and the scale of the impact of drought events in our Water Resources Management Plan (WRMP). This includes understanding our resilience to 1 in 200-year drought events and to 1 in 500-year events, in terms of how we would expect our normal supply availability to be impacted.

Whilst our groundwater supplies are quite resilient to drought, when lower groundwater levels are experienced, this can have an impact on yields in some cases, water quality and how we operate sources. A critical factor for us is ensuring we have sufficient supply available to meet summer demands during a drought event, and to minimise the environmental stress in the early stages of a drought.

Our WRMP states what our planned levels of service are for the frequency of customer restrictions, such as temporary use bans, often referred to as hosepipe bans, for domestic customers; non-essential use bans on non-household customers; and emergency drought orders to further restrict supplies.

Our groundwater supply system is most vulnerable to longer term droughts, over subsequent drier than average winters, as well as droughts where this is combined with above average warm and dry summers. We manage this risk by monitoring several indicators and maintaining a long-term view of potential drought impacts. We are also conscious that there are actions that we can take earlier in a drought sequence that could benefit the environment, when it may be under additional stress due to drier weather before public water supply impacts are seen. Because of this, following the publication of our latest WRMP, we made a commitment to review our drought triggers for this drought plan.

2.3 Levels of Service

Following publication of our WRMP in 2025, we committed to a review of our drought triggers prior to our next drought plan review. This included a comprehensive update of our drought indicators and triggers. Our previous drought plan was amended to include an environmental stress trigger so that we could consider actions that we can take to protect the environment, in particular chalk streams, when river levels are low and groundwater levels lower than average, but before we experience any water supply impacts. Our updated plan goes further in how environmental stress is monitored and identifies actions that can be taken before level 1 drought status. As a result of this review, we have moved to a multi trigger approach to our drought triggers, and so that there can be an earlier focus on protecting the environment, we have amended our levels of service.

Table 1. Levels of service

Drought Status	Drought Action	Level of Service
Level 1	Enhanced Communications	1 in 5 years
Level 2	Temporary Use Ban (TUB). Restrictions on domestic customer use	1 in 10 years
Level 3a	Non-Essential Use Ban (NEUB), or ordinary drought order. Restrictions on non-household customers	1 in 50 years

Level 3b	Extreme drought actions. Drought permits and drought orders	>1 in 200 years
Level 4	Emergency drought orders. Rota cuts and/or standpipes.	Deemed unacceptable >1 in 500 years

Our proposed levels of service have changed for Level 1 and Level 2 drought actions, and are linked to both surface water and groundwater indicators, using a combination of environmental, climate and groundwater triggers. This would represent a variation to those in our published WRMP but was a commitment to review that we made during publication, however this does not have a material impact on the WRMP due to the way that the levels of service measures are represented. Environmental stress indicators and actions occur before Level 1.

2.4 Development of drought triggers

Our drought triggers inform us on are applied at the water resource zone level and have been developed with reference to the latest Environment Agency guidance. As already discussed, these triggers have evolved from those in previous plans and have been updated to reflect changes in our overall water resources position, and to take account of environmental stress. The triggers have been tested against several drought scenarios of various length and severity, including historic drought sequences and events. Our drought trigger levels, and associated drought actions are set out in table 2 and in more detail in the following sections.

The triggers that we have selected represent various hydrogeological, environmental and meteorological conditions as measured by our drought indicators. One or more drought Indicators can define a drought trigger point and those actions that would be considered at a trigger level as a drought progresses. Each trigger level also aligns with our communication plan (see appendix B), which sets out the types and levels of communications that will escalate during a drought. As appropriate, triggers are adjusted to allow for the lead in time to implement associated drought actions, which can be significant in the case of some supply options.

2.4.1 Changes to approach

We have reviewed our triggers and indicators to incorporate the following:

- Actions have been linked to drought status of both surface water and groundwater resources.
- A preceding stage of environmental stress is included before Level 1 due to the sensitivity of catchments to groundwater abstraction where there are likely impacts on the environment prior to water resources impacts
- Actions at Level 1 and Level 2 have also been revised to ensure preparatory actions occur prior to the level being implemented. Eg preparation for a TUB occurs towards the end of a level
- Moving from level 1 to level 2 requires two different criteria to be met (e.g. climate and groundwater, climate and flow or flow and groundwater), so that actions only progress once multiple triggers are suggesting drought conditions and prevents escalating actions based on one system alone which might not represent a wider drought.
- To leave a level (or sub-level) all criteria need to no longer be met for all sites. This means that leaving a level is more stringent than entering it. This helps to ensure that measures are not lifted when drought conditions are still present and to avoid fluctuations between levels.
- Level 3 and 4 drought actions have been defined related to triggers although recent historic droughts have not been this severe. As observed data is not available to validate these, and flexibility is still required when considering the implementation of these actions.

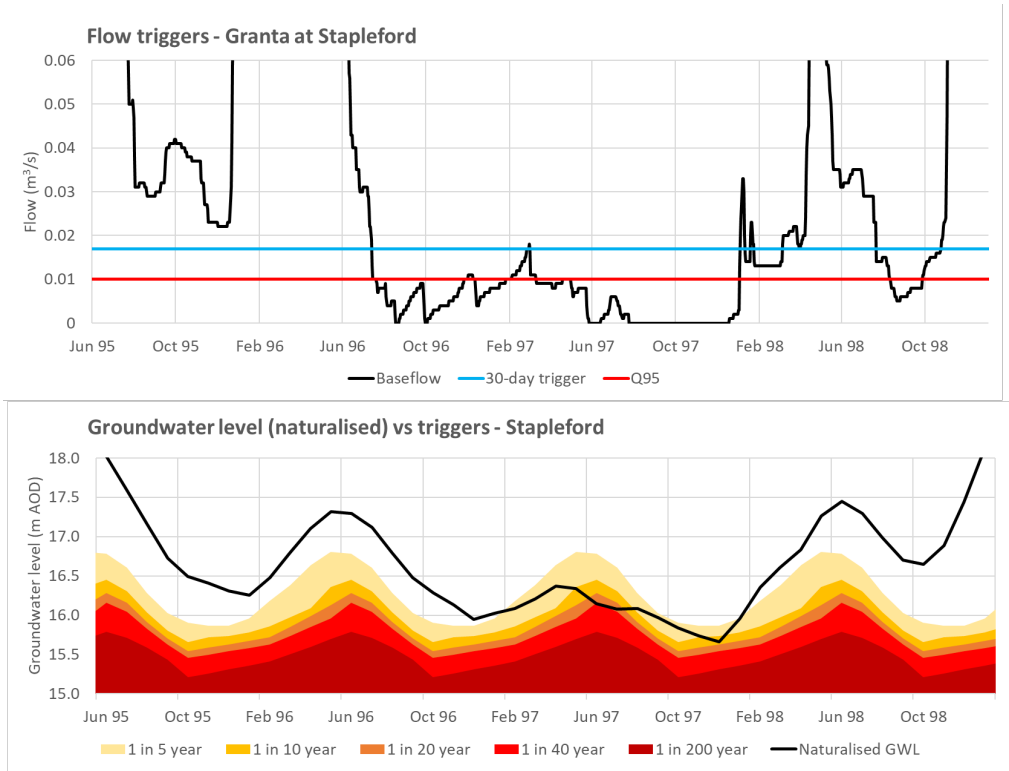
2.5 Testing our drought triggers

The indicators and triggers that we have reviewed and updated for this drought plan have been tested against historical drought sequences, and this has supported the change in our levels of service. The triggers and indicators relate to the return periods of droughts, and comparison of these shows that river flow indicators trigger before groundwater levels as would be expected, this allows us to act earlier in what could be an extended drought sequence. In appendix C, we describe how we have developed and tested our drought triggers. The scenarios presented include droughts of a similar severity as those included in our WRMP planning assumptions, as well as more severe droughts. This demonstrates that our drought triggers for managing resources and demands are robust across several plausible drought scenarios.

The locations that we have selected for our drought triggers have a sufficient data record and show a response to previous drought scenarios. This is shown in the following sections. An example of this is shown in Figure 2 below for the 1996-1997 drought conditions, for the river flow vs. 30 day trigger and groundwater level triggers

Where we deem it appropriate and the environmental risk is low then there is some flexibility in the timing of actions relating to our triggers, so that we can align with other companies and with the regional situation. We also take account of the EA drought status and triggers in our approach to drought management.

Figure 2. Flow & groundwater triggers



Droughts and heatwaves

A drought that impacts public water supply is usually a medium to long term event impacting availability of water due to shortage of rainfall to recharge the aquifer, usually over consecutive winters. Drought events are managed with supply and demand actions as set out in our drought plan. Heatwaves are shorter events when higher than average demands for water are experienced due to hot dry weather in the summer. These types of shorter peak demand events are common and are managed as typical periods of high demands through normal operations, and are planned for in a different way as part of our summer action plan. They can occur during a drought, which can elevate pressure on supplies, and if this occurs, both drought and other more business-as-usual actions and measures can be used to help reduce demands and increase supply.

2.6 Climate triggers

Prolonged periods of low rainfall will often precede low groundwater levels and river flows leading to drought. The Standardised Precipitation Index (SPI) and Standardised Precipitation-Evapotranspiration Index (SPEI) are commonly used indices and show anomalies (deviations from the mean) of rainfall and potential evapotranspiration (PET) respectively at a given location.

We have used rainfall and evapotranspiration data from the MET Office for 1891-2022 to calculate SPI and SPEI indices for our catchment. These are calculated monthly for an accumulation period using a rolling time window with the magnitude of change indicating the severity of a dry event or period. They are designed to provide an early warning of drought.

We calculate these over a range of periods:

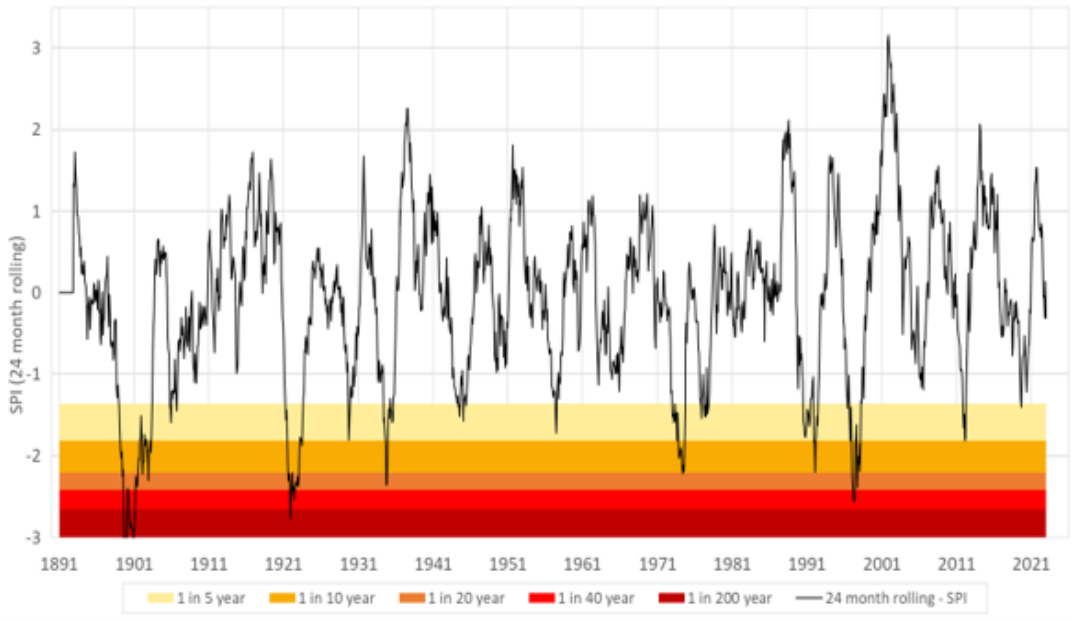
Short duration (1 to 3 months): Indicator of immediate impacts (e.g. reduced soil moisture).

Medium duration (3 to 12 months): Indicator of intermediate impacts (e.g. reduced stream flow).

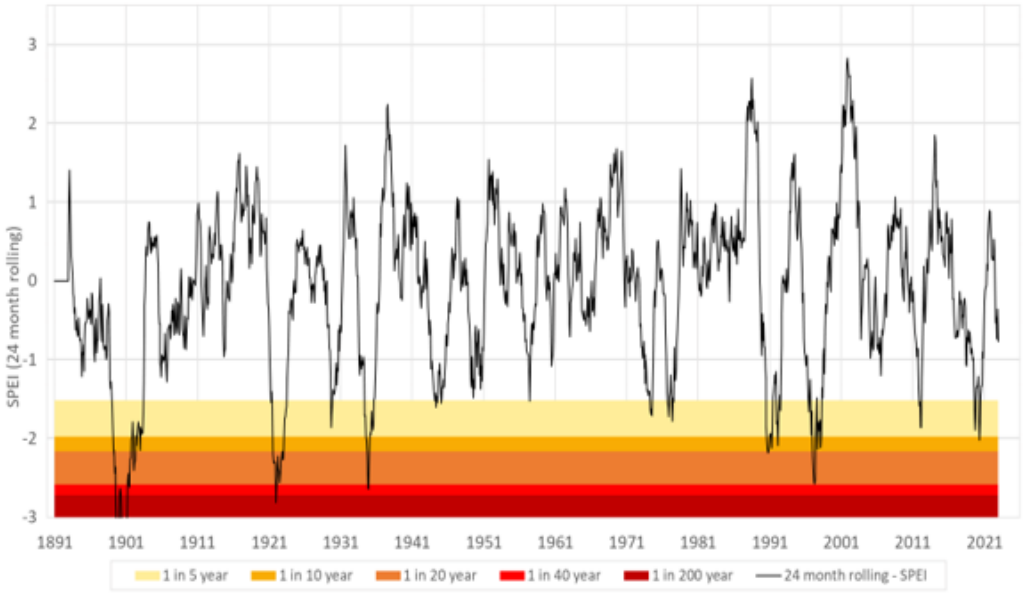
Long duration (12 to 48 months): Indicator of long-term impacts (e.g. reduced groundwater recharge).

The triggers are calculated using a percentile approach, for example the 1 in 5 year trigger is given by the SPI/SPEI value that corresponds with a 20% exceedance probability (i.e. 20% of the data occurs below this value). Analysis of SPI and SPEI and SSI is for month end, so forecast conditions are important to consider alongside these metrics, and some judgement may be required based on the prior month and likely conditions through the following month.

Figure 3. Example of climate trigger and return periods



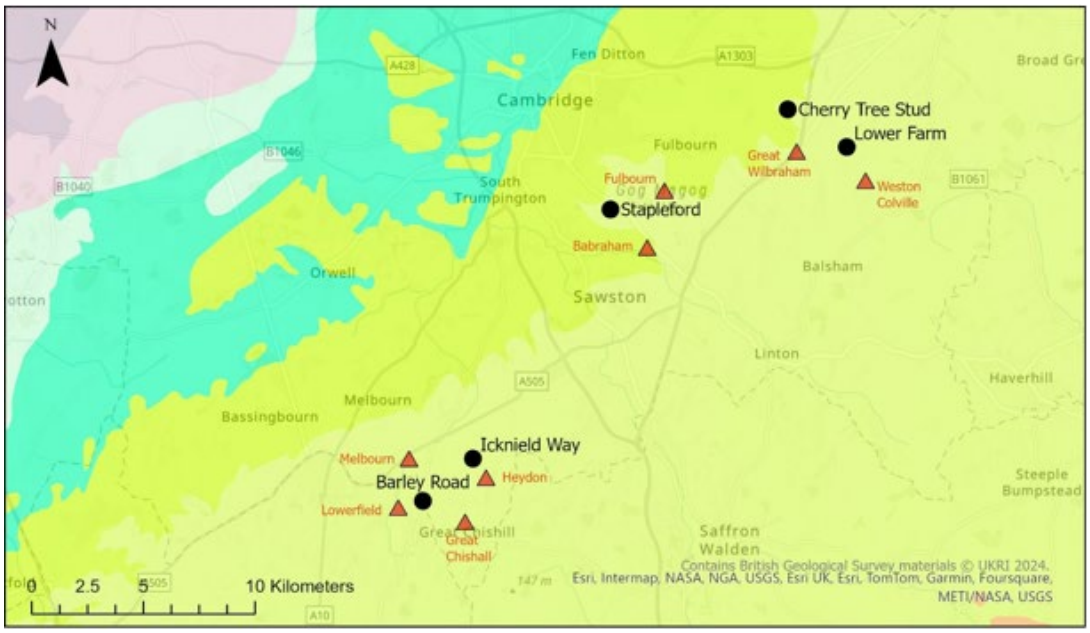
Granta at Babraham 24-month SPI



2.7 Groundwater triggers

The indicator boreholes used to trigger drought measures have been updated, retaining four of those previously used and an additional borehole, which have suitable historical datasets and represent the area of our supply abstractions. We have also revised the methodology to define trigger levels. To assess only the impact of recharge on levels, abstraction impacts have been removed by calculating a naturalised set of groundwater levels with abstraction influences removed from the observed groundwater levels. Triggers have been derived from statistically robust and seasonally varied groundwater levels for each month. These were then compared to observed groundwater levels. A set of seasonally varying groundwater triggers were calculated using a statistical distribution method and a trigger for each month was derived from the best fitting distribution of 8 tested. Smoothing of the trigger profile was applied where considered appropriate. To allow for a comparison between observed groundwater levels and the groundwater level triggers, the triggers were de-naturalised.

Figure 4. Groundwater trigger monitoring points



2.8 Environmental triggers

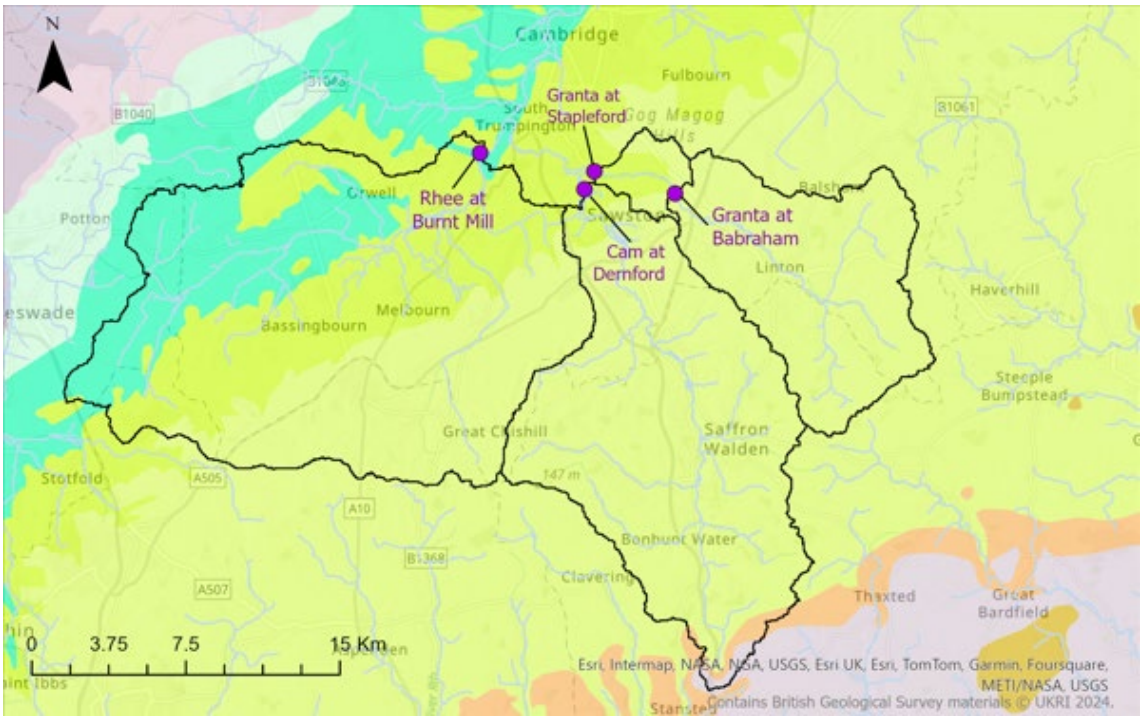
A new set of indicators have been developed to identify when river flows suffer in a drought to understand environmental stress, and to inform measures that could be taken to mitigate low flow impacts.

Triggers have been calculated using river flow data at four gauging stations on the Cam, Rhee and Granta and long term simulated flow series from hydrological models. The models have been developed specifically to represent low flows during drought as accurately as possible for the chalk streams in our catchments.

Two sets of environmental triggers were developed,

- Main environmental triggers: Based on an assessment of the flow series and historical crossings of low flow thresholds.
- Secondary environmental triggers: Based on the Standardised Streamflow Index (SSI) drought metric. The SSI is similar to the SPI and SPEI but is generated only for a 1 month accumulation period.

Figure 5. Flow trigger locations



Simulated flows were used for the development of the triggers as the gauged flow records provide data only as far back as 1949. Flow series from 1891 to 2022 were generated using rainfall/runoff models, and simulated flows calibrated against observed flows. The model selected provides improved results against very low flow conditions. The gauged flow locations are current and telemetered so can be used to update indicators, and the triggers provide an 'early warning' of conditions where environmental stress due to low flows could be expected.

For the SSI trigger, flow data is accumulated over 1 month (30 days) and these are calculated to achieve the expected return period of droughts for a particular accumulation period. 30-day warning triggers do not necessarily guarantee 30-days. This is an average response time based on a review of the historical series.

Both environmental triggers were checked against observed flows to ensure they represented previous drought periods, examples of this are shown in the following figures.

Figure 6. River flow trigger example

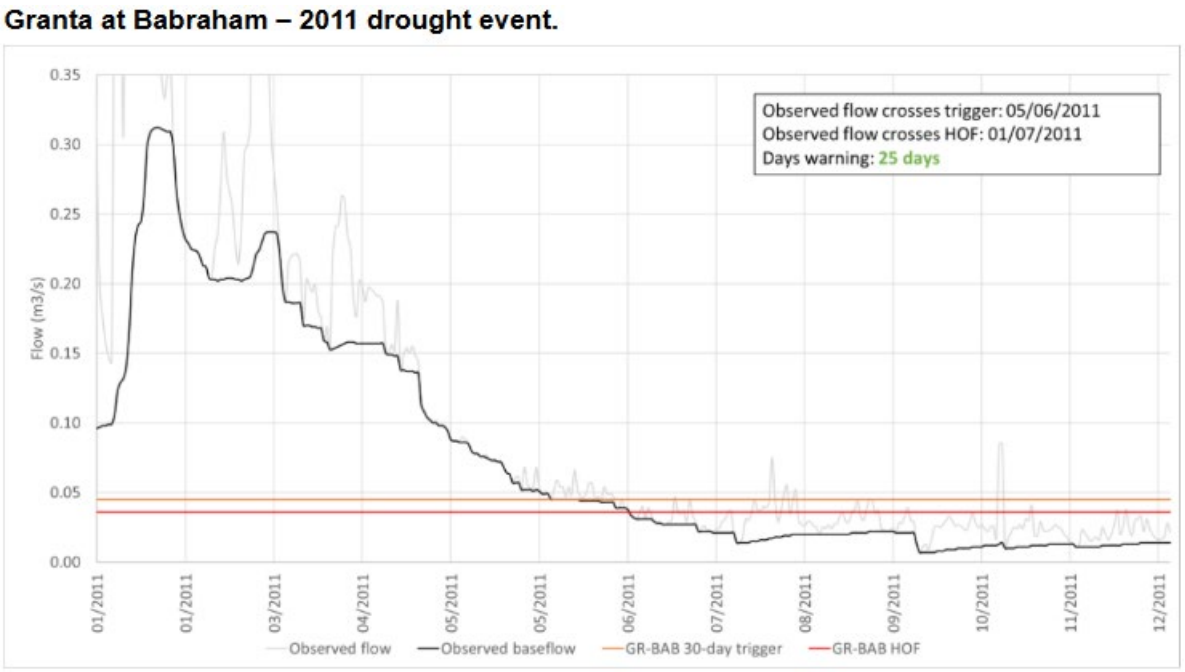
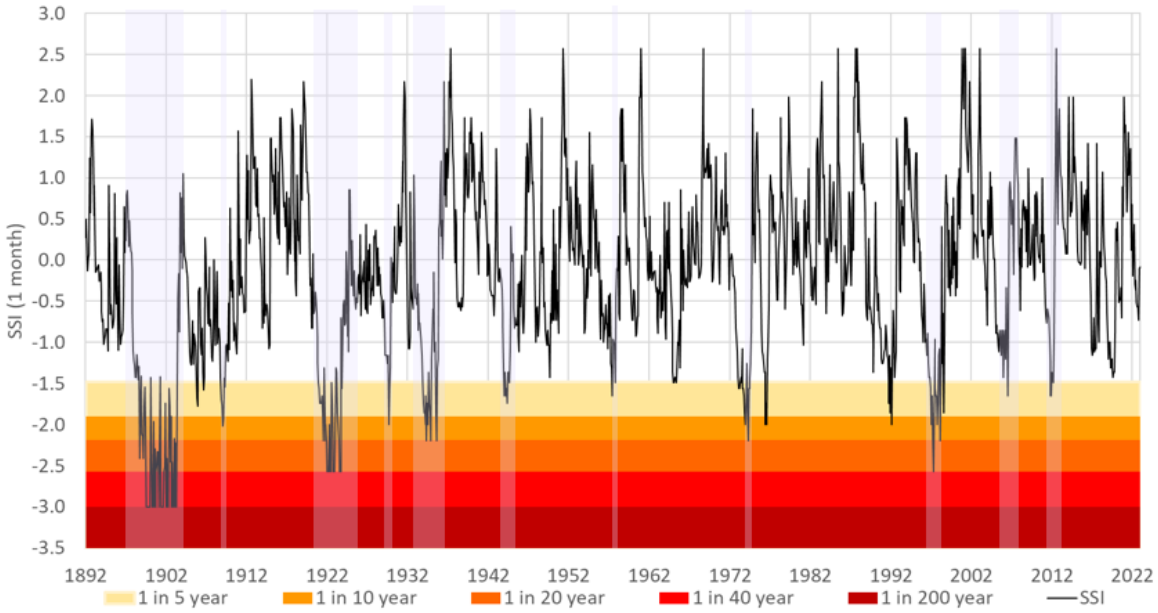


Figure 7. Example of SSI triggers with percentile triggers (Granta at Babraham)



2.9 Principles of applying drought triggers

Our drought triggers, and the associated actions that we can take linked to our levels of service have been developed so that they use the status of surface water and groundwater resources. Environmental stress triggers are included to reflect the sensitivity of chalk stream catchments and low flows due to lower groundwater levels and groundwater abstraction. Environmental stress actions are similar to many actions at Level 1, but precede water resources impacts that would result in preparing for actions such as formal customer restrictions. Our review of triggers and actions has ensured that the required preparatory actions occur prior to a drought level when actions would be implemented.

Moving from Level 1 to Level 2 requires two different criteria to be met (e.g. climate and groundwater, climate and flow or flow and groundwater). This ensures that actions only progress once multiple triggers are suggesting drought conditions and prevents escalating actions based on one system alone which might not represent a wider drought. Actions at lower levels are assumed to continue as a drought progresses and potentially becomes more severe.

To leave a level (or sub-level) all indicator criteria need to no longer be met for all sites. This means that leaving a drought level is more stringent than entering it. For example, 2 groundwater sites below a 1 in 5 year are required to enter a level 1a but to exit a level 1a both sites need to be above this level). This helps to ensure that measures are not lifted when drought conditions are still present and to avoid fluctuations between levels.

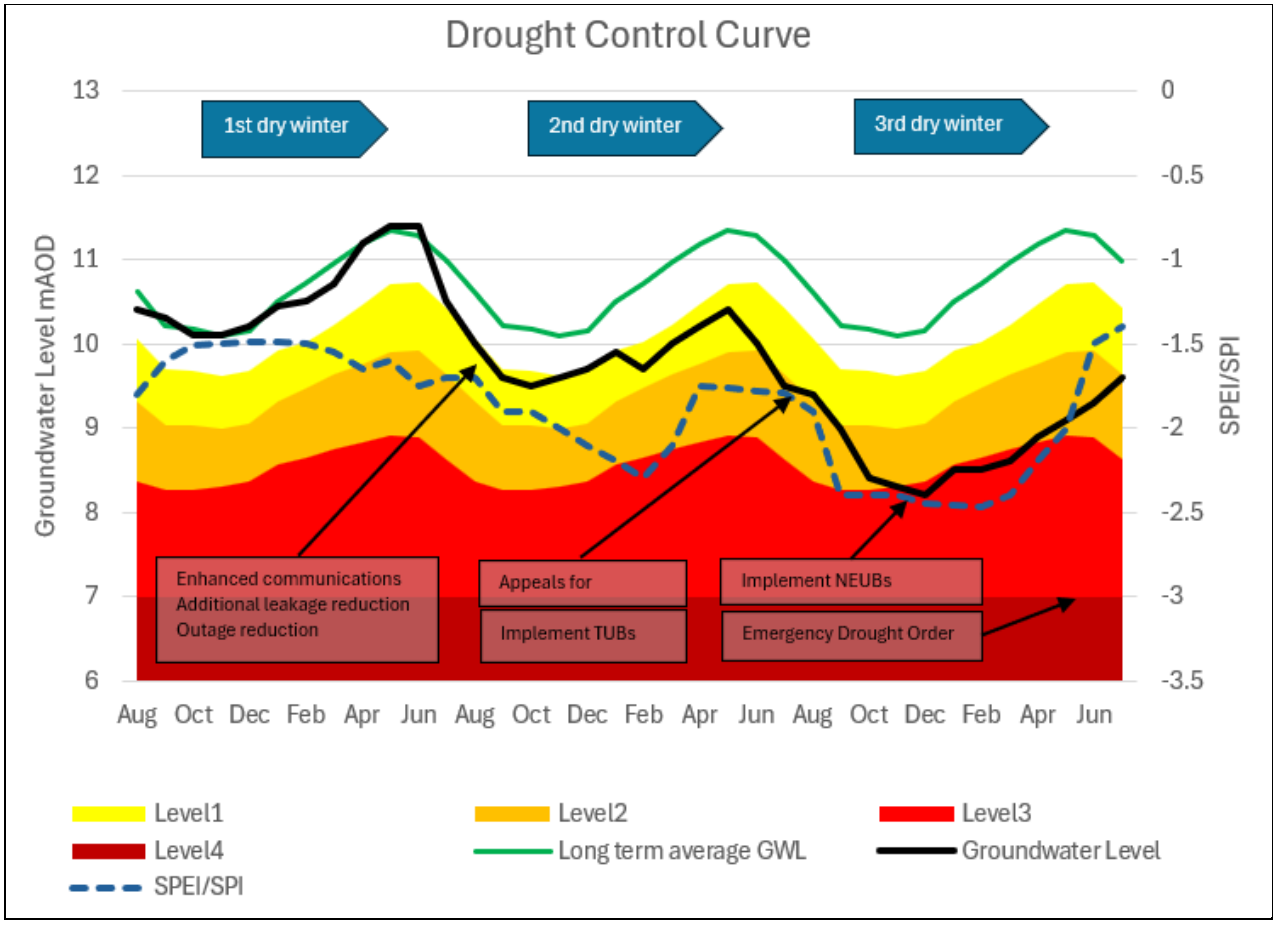
Level 3 and Level 4 drought actions have been defined related to triggers. However, recent historic droughts have not been this severe. As such, observed data is not available for validation of these rules and flexibility should be adopted in the implementation of these actions.

The analysis of SPI, SPEI and SSI is for month end when data is available. In the cases where a decision is needed mid-month and these metrics are not available, some judgement will be required, and would be made based on the prior month and likely conditions through the month, using short-medium term weather forecasts for example.

2.10 Drought control diagram

The drought control curve diagram in figure 8 below summarises the sequence in which each of our drought triggers would be reached. For clarity, not all possible triggers are shown, this represents a typical sequence of drought triggers and associated actions.

Figure 8. Typical drought control curve diagram



3. Drought actions

This section explains the actions that we can take at each drought level as they are triggered through a drought sequence. Our drought triggers are associated with drought management actions at various stages during a drought event, such as enhancing communications with customers and implementing supply and demand management measures, for example temporary use bans (TUBs). Our actions are aimed to reduce impact on the environment, by managing abstractions and supplies, and reduce demands for water to manage supply and demand through a drought.

3.1 Overview of drought actions

This plan demonstrates how we would manage resources and demands through several varied but plausible drought sequences, by implementing a range of available management actions in an effective manner. We aim to balance the needs of customers against the needs of the environment by considering and implementing several demand-side and supply-side measures, maximising demand-side measures as a priority before resorting to supply side options that may impact on the environment. We implement all our drought actions at the WRZ level.

We will implement the actions described in this plan according to the triggers detailed in the following sections. Although the actions related to each of our triggers are not prescriptive, they provide a framework and timetable of actions through the most likely drought sequences we might expect to see. We have developed these actions using the experiences of historical droughts, together with the predicted impact of more severe droughts using statistical methodologies.

The drought management actions included in this plan would allow us to manage a drought sequence, similar to those historically experienced, as it progresses in severity, and beyond to even more extreme droughts. Unprecedented and very extreme drought beyond our known vulnerability leading to severe water shortages would be covered by measures set out within our drought emergency plans.

A key part of our drought management strategy is effective engagement with stakeholders, regulators, and household and non-household customers. Our communications approach is described in more detail in section 5 and Appendix B.

Drought triggers and drought actions

Each drought trigger has several ‘indicators’ that determine when the trigger is reached. The drought triggers are associated with actions to manage and minimise the risks of a developing drought, using both demand and supply measures. The sequencing of the actions that we can take is when they would be expected to be required, however it is not meant to be prescriptive. Our aim is to minimise impacts on customers and the environment, whilst keeping customers and other stakeholders informed of the situation as it develops. Our supply actions are prioritised so that those with the least environmental impact are implemented first, and when demand management actions and environmental mitigations are already in effect.

3.2 Drought management team

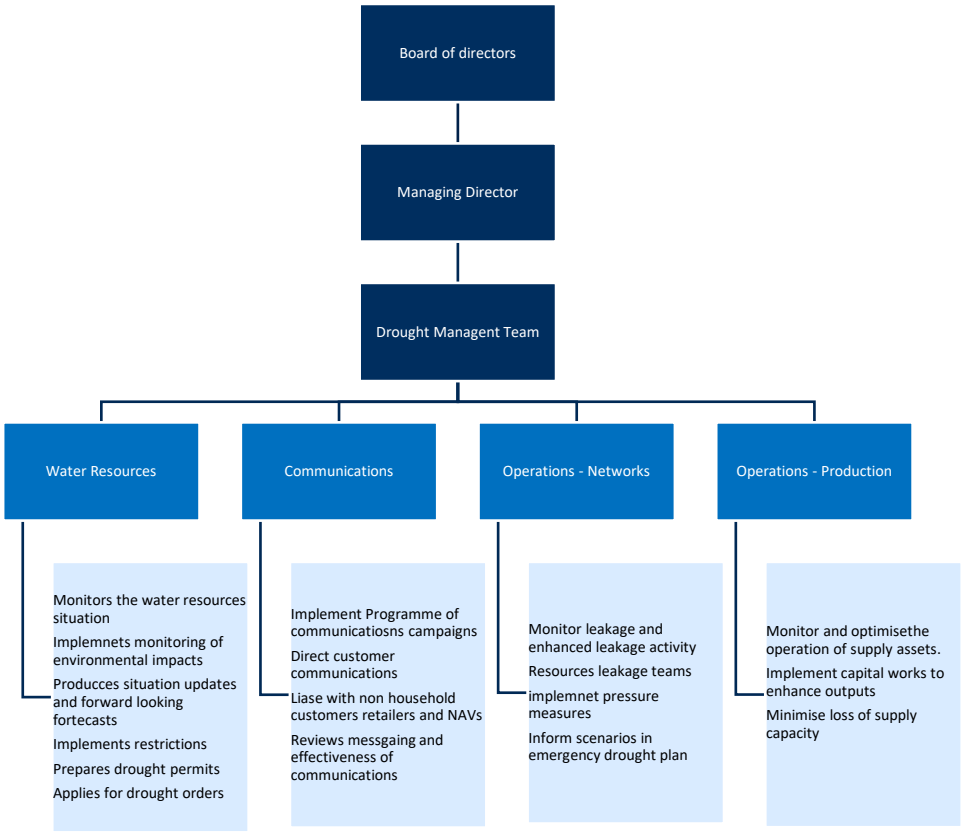
During a developing drought situation, our triggers and indicators are monitored closely by the water resources teams, informing the Executive management team as required. Once we are in Level 1 status a drought management team is formally convened to track our triggers, status of actions and to feed into various regional, national and other sector stakeholder groups, as well as other key internal stakeholders. We will convene regular meetings as the situation develops and hold a final debriefing when normal operations resume. The drought management team will use our drought triggers and indicators to decide:

- at what point the drought has receded sufficiently for any imposed drought measures to be relaxed; and
- the timing and content of communications to customers and other stakeholders, advising that the situation has returned to normal.

External stakeholders will include, the Environment Agency, regional water resources groups (Water Resources East), the national drought group, Retailers and NAVs[1]. The drought management team ensures that key decision making takes place, ensures that actions are being implemented and managed effectively and reports into the board. The core team is supported by technical subgroups responsible for various specialism. Activities covered and frequency of meetings are dependent on the water resources situation, and will escalate as the seriousness of drought progresses.

In the event of any drought action being contemplated our drought management team and Executive Director will consult the Board for key decisions, such as implementing TUB or non-essential use ban (NEUB) restrictions and requirements for significant expenditure.

Figure 9. Structure of the drought Management team



[1] Non appointed variation or insets – independent water companies supplying customers within our boundary.

3.3 Drought Triggers and Actions

Our drought triggers and related actions are summarised in table 2 below. These are discussed in more detail in the next sections.

Table 2. Drought Triggers and Actions Summary

Drought Level	Drought Triggers	Demand Actions	Supply Actions
Normal	business as usual. SPI, SPEI, GW or flow thresholds reached.	Routine demand management messaging.	Normal operations.
Internal warning	6 month SPI or SPEI below 1 in 5 year; OR Granta (Babraham) below 30-day warning level; OR 1 GW level site below 1 in 5 year.	Prepare targeted communications Increase frequency of monitoring Enhanced communications with stakeholders and internally	Ensure availability of all sources - Review of planned and unplanned outages, site capacities and treatment. Check readiness of GW support schemes.
Environmental Stress	12/24 month SPEI or SPI below 1 in 5 year; OR Cam, Rhee or Granta (Stapleford) below 30-day warning; OR Granta below HOF or Q95.	Additional promotion of water efficiency, targeted campaigns. Enhanced engagement with external stakeholders and interest groups.	Reduce abstractions at sensitive sources and optimise sources for least environmental impacts. monitor and prepare for Granta HOF conditions. Implement augmentation of sensitive sites and Implement Hands Off Flow conditions.
Level 1	12/24 month SPEI or SPI below 1 in 10 year; OR 2 rivers below Q95 and 1 below 30 day; OR 2+ river with SSI below 1 in 5 year; OR 2+ GW level sites below 1 in 5 year.	Enhanced Communications - Additional promotion of water efficiency, targeted communications. Demand management - Increased leakage control. Enhanced engagement with external stakeholders. Further communications - appeals for restraint. Preparation for TUB implementation.	Optimise abstractions and source availability. Review planned outages to essential (Regulatory/legal) only. Voluntarily reduce abstractions at environmentally sensitive sites. Maximise licenced outputs at sources where Environmental risk is lowest. Enhanced monitoring at sensitive sites at risk of deterioration.
Level 2	ONE LEVEL 1 CRITERIA AND ONE OF: 12/24 month SPEI or SPI below 1 in 40 year; OR 2+ rivers with SSI below 1 in 10 year; OR 2+ GW level below 1 in 10 year.	Implement temporary use bans. (TUBs), voluntary residential water use reductions. Prepare for non-essential use (NEUB) drought order application. Apply for NEUB.	Optimise current licensed abstractions. Implement WFD no deterioration monitoring. Prepare low environmental impact drought permits (if applicable).

Drought Level	Drought Triggers	Demand Actions	Supply Actions
Level 3a	ONE LEVEL 2 CRITERIA AND TWO OF: 24 month SPEI or SPI below 1 in 40 year; OR 2+ rivers with SSI below 1 in 40 year; OR 2+ GW level below 1 in 40 year.	Implement NEUB. Consider removal of TUBS exceptions. Further enhanced communications for voluntary residential water use reductions.	Maximise use of existing licence headroom. Drought permits and orders with moderate to major environmental impact (where applicable).
Level 3b	24 month SPEI or SPI below 1 in 200 year; AND 2+ rivers with SSI below 1 in 40 year; AND 3+ GW level below 1 in 40 year.	All possible actions to avoid emergency drought orders. Extreme actions to delay emergency drought orders. Environmental urgency, day zero type messaging. Communications on impacts of rota cuts, standpipes. Explore extreme drought options – stakeholder engagement/other sectors.	All possible actions to avoid emergency drought orders. Extreme actions - drought permits and ordinary drought orders. Prepare for EDOs and rota cuts.
Level 4	2+ rivers with SSI below 1 in 200 year; AND 3+ GW level below 1 in 200 year.	Emergency plan for drought - drought orders for rota cuts and standpipes.	Emergency plan for drought - drought orders for rota cuts and standpipes.
End of drought	All 12 month SPI above -0.5; AND All GW level above 1 in 5 year. 12 month SPI for current river(s) above 0; AND All rivers above their 30-day triggers.	Return to BAU. Thank customers and stakeholders.	

3.4 Environmental Stress actions

The environmental stress trigger would indicate when waterbodies are beginning to be affected by a lack of rainfall and lower than average groundwater levels, both of which support normal river flows. This trigger would precede any impact on water supplies, however low flows in parts of watercourses could see ecological impact on fish populations and macroinvertebrates.

Our actions are mainly focused on raising awareness for customers of the environmental impacts of abstraction on river flows, through education and communication campaigns linking water use to environmental impacts and asking water users to be as efficient as possible. This is an enhanced level of communication over business as usual and will use multiple commonly accessed channels that people use day to day.

Other supply related actions that we will consider at this stage are changes to abstractions where there is an identified impact at lower flows. Some licence conditions to provide flow support or reduce abstractions may already be in effect, however if this is not the case, we will review the supply situation and implement these sooner if practicable.

Table 3. Environmental Stress Actions

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
Enhanced communications	Increased frequency and channels used for usual	Curtails increases in demand/peak demands >0.5Ml/d	Keeping the message clear, customer pushback, ineffective	1-2 weeks lead time	+ive impact reduces demand
Enhanced communications	Bespoke campaigns linking water use to environmental stress	Curtails increases in demand/peak demands >1Ml/d	Keeping the message clear, customer pushback, ineffective	3-4 weeks lead time	+ive impact reduces demand
Environmental support	Review & reduce abstractions at sites with licence HOFs	Reduces supply >1.4Ml/d	Reduces supply, water quality constraints, may be in effect already	<1 week	+ive reduces abstractions at sensitive receptors
Operational activity optimisation	Minimise operational use of water	Varies, most effective during peak periods >2Ml/d	Essential works cannot be delayed, water quality	<1 week	+ive impact reduces demand
Environmental support	Voluntary reductions of abstractions near sensitive sites	Could reduce supply estimate >3Ml/d	Demand outstrips supply	2-4 weeks	+ive reduces impacts at sensitive receptors
Environmental support	Prepare monitoring plans at sensitive waterbodies at risk of deterioration if required	Provides understanding of impact	resources	2-4 weeks	-/+
Demand management	plan for bespoke communications campaigns	n/a	resources	1-2 weeks	n/a

Reducing Demand

We have an ongoing demand management programme to promote water efficiency and to encourage customers to switch to measured (metered) bills, including incentives for them to change their water use behaviours. Key early drought actions in this plan include a progressive increase in communication and messaging around water efficiency, as described in our communications plan.

Once our drought plan is activated, our communications plan is an important part of the early actions that we take to reduce demands and raise customer awareness. The type of messaging, frequency and different channels used increases through the environmental stress trigger and into Level 1 and beyond. The environmental stress trigger communications approach aims to have achieved heightened awareness for stakeholders and customers of the environmental impact of dry weather and the actions they can take, and the importance these can have on sensitive areas of the environment such as chalk streams which are supported by the same aquifer that we abstract from for public water supplies.

Our communications include commencing liaison with key stakeholders internally and externally, such as the Environment Agency, WRE, environmental NGOs and other third parties. We will use easily accessible information channels such as Facebook and Instagram where messages can be dispersed widely and rapidly.

Protecting the environment

Several of our existing licences have conditions that restrict outputs to protect environmental flows, or to provide support or augmentation to flows. Once the Environmental Stress triggers are reached, we will review the status of these conditions, and if not already in effect, consider implementing them earlier. These will need to be considered alongside the Environment Agency's river support schemes which also provide environmental benefits as flows reduce, and compliment the reductions we can make to abstractions. Implementation of environmental monitoring will be considered on a case-by-case basis, informed by our environmental assessment and operations.

Environmental Stress

Environmental stress refers to where reduced rainfall, and river flows could start to impact on wildlife. This would not necessarily mean fish kills or streams drying up and loss of habitat, but refers to conditions outside of normal parameters where these organisms and systems in some areas could be subject to additional stress. This is when the Environment Agency will be monitoring fish and ecology more closely than usual, and mitigate any impacts as well as preparing for a worsening situation. The Environment agency approach to managing drought can be found here: Drought: how it is managed in England - GOV.UK and they also maintain drought plans for each operational area of the UK.

Actions to increase supply

In the early stages of a dry weather cycle there will be no impact on existing supplies, and little need to increase supply, however we will begin to take a forward look to optimising our supply sources and operational activities to protect supplies. This will include reviews of planned work and ensuring that all sources are fully available and operational. If we optimise our typical operations and provide environmental support through augmentation and abstraction reductions, the overall impact on supplies is neutral.

Stakeholder engagement

Engaging with customers and stakeholders is crucial at this stage so that they are made aware of an impending drought situation with the potential to worsen, and also for awareness of how they can make a difference to the environmental stress through actions to reduce demand for water. To get this message across at this stage we will use the tools available in our agile communications plan for enhanced water efficiency promotion, e.g. promotion of switching to a water meter, thinking about how much water is used in certain activities and whether they are necessary, whilst linking water use activities to the environment. We will highlight what actions we are taking to also manage demands and protect the environment, e.g. our leakage efforts, abstraction management and our chalk streams restoration programme. Where applicable we will also engage with managers of local sensitive site, local interest groups such as river protection societies, alongside the environment agency to work collectively on measures to protect the environment when under stress. As part of this we may offer educational visits, advice and raising of awareness of where the local environment can be helped.

At the same time as our customer communications is increased, we will be updating on our water resources situation to stakeholders such as the EA, Natural England, Defra, wholesale retailers, NAVs and other water companies, so that they are aware that we have activated our drought plan and actions may increase other time. Our approach is outlined fully in our communications plan, presented in Appendix B.

3.5 Level 1 actions

As Level 1 drought indicators are reached, a lack of rainfall will have started to have some noticeable impacts on water resources and groundwater levels, as well as river flows. Experience of previous drought events has shown that our operations and sources remain reliable for some time into a drought – they are typically robust through two dry winters before Level 2 triggers are reached. It is important at Level 1 that we continue to manage and reduce demands, including leakage, to maintain a good supply demand position if drought develops further. We would also continue with those actions already implemented at the environmental stress stage. Alongside these actions, we will start to ensure that availability of all sources is maximised, and plan to use the least environmentally impacting supplies. As we remain at Level 1, and gradually progress through worsening indicators, our customer messaging will also increase in frequency and tone, as we prepare for the possibility of temporary use bans and formal restrictions into Level 2.

Estimated savings are provided in the table of Level 1 actions, these are based on previous experience gained in droughts and from industry examples or documented savings. By further reducing demand and optimising operations we would expect the overall supply demand balance to remain healthy, with environmental protection measures in place.

Where applicable, the actions commenced from the environmental stress trigger would continue into Level 1.

Table 4. Level 1 Actions

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
Enhanced communications	Use of radio and media for regular messaging	Curtails increases in demand/peak demands >1Ml/d	Keeping the message clear, customer pushback, ineffective, messaging fatigue	3-4 weeks lead time	+ive impact reduces demand
Enhanced communications Demand management	Direct customer contact (email/text message)	Curtails increases in demand/peak demands >1Ml/d	Keeping the message clear, customer pushback, ineffective, messaging fatigue, maintaining savings	1-2 weeks lead time	+ive impact reduces demand
Enhanced communications Demand management	Direct customer contact (email/text message) appealing for restraint	Curtails increases in demand/peak demands >3Ml/d	Keeping the message clear, customer pushback, ineffective, messaging fatigue, maintaining savings	1-2 weeks lead time	+ive impact reduces demand
Demand management: Leakage reduction	Review of leakage position and increased leakage efforts – additional resources	Reduces overall demand 0.5-2.0Ml/d	Savings depend on starting position; Diminishing returns; Weather related effects, resource requirement, cost approvals	1-3 weeks lead time	+ive impact reduces demand

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
Prepare to implement TUB	Make preparations for Level 2 implementation	n/a	Board approval	1-2 weeks lead time for approval & publication	n/a
Operational activity optimisation	Review planned outages to essential work only (legal or regulatory driver)	Varies, most effective during peak periods 2-4Ml/d	Essential works cannot be delayed, water quality	<1 week	-/+ impact increases supply
Maximise Supply availability	Maximise licenced outputs at sources where environmental risk is lowest	Increase supply estimate >3Ml/d	Constraints on sources	1-2 weeks	-/+ environmental risks need understanding
Environmental support	Increase support augmentation	Reduces supply >1.9Ml/d	Reduces supply, water quality constraints, may be in effect already	<1 week	+ive reduces impacts at sensitive receptors
Environmental support	Voluntary reductions of abstractions near sensitive sites	Could reduce supply estimate >3Ml/d	Demand outstrips supply	2-4 weeks	+ive reduces impacts at sensitive receptors
Environmental support	Implement monitoring plans at sensitive waterbodies as required	Provides understanding of impact	resources	2-4 weeks	-/+
Demand management	Prepare to implement TUB	>1Ml/d	Media attention, customer contacts increase	2-3 weeks	-/+
Communications warning of likelihood of TUB	Direct customer contact use of all media channels	Prepares for TUB	Keeping the message clear, customer pushback, increase in consumption before TUB	1-2 weeks lead time	-ive impact can increase demand temporarily

Reducing demand

The enhanced communications that we would put in place at Level 1, including potential bespoke and targeted campaigns for which planning would already have commenced, aim to achieve similar demand savings expected with a temporary use ban in place but within Level 1, before we may need to officially restrict some water use at Level 2.

Through experience of previous customer campaigns of several types, we estimate that the savings made by reducing demands through Level 1 could be up to 3Ml/d. Many demand management communications actions can be implemented quickly in just a few weeks, and our communications plan maintains an adaptive approach, this allows us to

develop more bespoke and targeted communications, particularly leading into periods of typical peak demands such as bank holidays and the summer.

At Level 1 we increase our leakage activities, supported by additional resources and leakage find and repair teams. Actual leakage can vary throughout the year and can be dependent on weather conditions, so additional benefit would depend on the preceding level of leakage. Our ability to implement additional leakage detection and repair activities is in part reliant on how well we can detect more and smaller leaks, as well as our ability to recruit the additional skilled personnel needed at times, although we do have additional resource available to us through existing contractual arrangement. Therefore, we estimate demand savings from additional leakage activity to be in a range of between 0.5Ml/d and 2Ml/d.

We recognise that to encourage positive action from customers in response to awareness campaigns and calls for restraint we will need to demonstrate that we are doing all we can to manage demand through leakage management. The enhanced communications at Level 1 will therefore include messaging around our own activities to support our appeals to customers to reduce water use.

As Level 1 indicators progress, we would begin planning for the implementation of TUBS during Level 2 to ensure readiness for when they may be required, this will include internal preparation and engagement, including any approvals required at board level.

Protecting the environment

Once Level 1 is reached, we would have environmental support in place at sensitive locations due to abstraction conditions on existing licences, and low flow support/augmentations would be in place. These will effectively reduce the amount of overall available supply for customers, but will protect the environment, habitat and ecology from low flow impacts. The reductions to supply would be offset by the expected demand reductions- our overall supply availability includes sufficient headroom to allow for this, as set out in the deployable output figures in our WRMP.

As we progress through Level 1, we will begin to implement enhanced environmental monitoring at the most sensitive locations to assess the impacts of the developing drought on the environment. The additional monitoring would continue and until river flows and groundwater levels have returned to normal conditions. Data collected will be used for reviewing the drought plan and future monitoring plans.

Actions to increase supply

The amount of additional supply that can be achieved through optimisation of operations and reducing planned work will vary depending on the antecedent situation, however we estimate this would be up to 4Ml/d. This could be greater at times of peak demand when we can utilise greater daily volumes of water, but for a shorter period only, approximately over 3-6 weeks. Our overall flexibility in supply headroom allows us to adaptively vary abstractions for annual and daily volumes throughout the year.

Stakeholder engagement

The stakeholder communications already in place would continue, but with increasing frequency, to both customers and other stakeholders. Previous dry weather and drought sequences have shown that Level 1 conditions can remain in place for many months before escalating to Level 2 or recovery to BAU. Therefore, a carefully balanced communications strategy is required to avoid message fatigue. Through Level 1 the intensity and urgency of messages can be increased as we continue to monitor our drought indicators through this stage; this significant uplift includes appeals for restraint to express the seriousness of the developing situation. Our levels of service include the need for a major publicity campaign

requesting voluntary water through appeals for restraint around once in every 5 years. As appeals for restraint are made we will start to warn customers of the potential for restrictions on use alongside advice on water efficiency, and would begin planning for this as Level 2 status becomes increasingly imminent. The channels that we utilise for communications will be increased, using those with longer lead times once at Level 1, such as paid advertising in local media, alongside bespoke campaign messages.

Once at Level 1 status, it is likely that the region will be in a similar position, and situational update meetings with regulators will have been formalised, and become increasingly regular. We will also be providing our forward look forecast for drought status to inform the national picture as the situation progresses. These updates will be provided to all stakeholders, including wholesale retailers, NAVs and regulars, usually through the Defra organised National Drought Group forum as a single point of information.

3.6 Level 2 actions

A prolonged dry period leading into drought will most likely lead to our triggers for Level 2 actions, indicating the requirement for more serious restrictions, and will usually follow two dry winter periods. Resources will potentially be constrained at some sources, and measures for further demand management and supply optimisation would be actioned. Where applicable, the actions commenced from the environmental stress trigger would continue into Level 1, and we would prioritise measures that reduce demand.

Typically following two dry winters there could be the need for formal restrictions to be applied to our customers, known as a temporary use ban (TUB). A temporary use ban, previously known as a hosepipe ban (redefined under the terms of the Flood and Water Management Act 2010), allows us to make temporary water use restrictions that we can implement without applying to the Secretary of State to do so. Our updated level of service is to introduce a TUB on water use on average not more than once in 10 years. We would normally apply these to our entire supply area and in alignment with other companies in the region, where possible.

A TUB sees greatest benefits during the periods where discretionary water use is high, typically outdoor spring and summer use, therefore crossing into Level 2 will not automatically mean an immediate temporary use ban is implemented. We will review the time of year, overall supply position and conditions being experienced. We may choose to delay the imposition of restrictions until a more appropriate time when they will provide most benefit.

We can put a TUB in place at any time when there is a risk to customer supplies, not only in drought situations, although this would be due to exceptional circumstances, and the timing of implementation will depend on the time of year for ensuring effectiveness and appropriate responses from customers.

Together with the standard exemptions included in the legislation, we can also apply discretionary concessions to TUBs, and make exemptions for certain water use activities. We have standardised these with other companies in the region for the sake of clarity for all customers. The approach to TUB implementation is set out in more detail below.

Table 5 below sets out the expected saving associated with TUBs and Level 2 actions. Where applicable, these have also been cross-referenced with the expected savings set out in UKWIR's code of practice and guidance on water use restrictions. The volumes saved do not necessarily represent year-round reductions; they are likely to be more effective for seasonal reductions, by curbing peak demands mainly in the spring through to autumn and maintaining a closer to average demand throughout the year.

Table 5. Level 2 Actions

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
Enhanced communications	Use of radio and media for regular messaging	Maintains demand suppression of c.2-3Ml/d	Keeping the message clear, customer pushback, ineffective, messaging fatigue	In place – continuation as per Communications plan	+ive impact reduces demand
Enhanced communications Demand management	Direct customer contact (email/text message)		Keeping the message clear, customer pushback, ineffective, messaging fatigue, maintaining savings		+ive impact reduces demand

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
Enhanced communications Demand management	Direct customer contact (email/text message) appealing for restraint		Keeping the message clear, customer pushback, ineffective, messaging fatigue, maintaining savings		+ive impact reduces demand
Demand management: Leakage reduction	Review of leakage position and increased leakage efforts – additional resources	Reduces overall demand 0.5-2.0Ml/d	Savings depend on starting position; Diminishing returns; Weather related effects, resource requirement, cost approvals	In place - continuation	+ive impact reduces demand
Implement TUB	Publish formal notices of restrictions	5Ml/d estimate	Board approval required, public perception, appropriate seasonal timing	>21 days from publication of notice. (includes 7-14 days for representations)	n/a
Operational activity optimisation	Cancel planned outages	Varies, most effective during peak periods 2-4Ml/d	Essential works cannot be delayed, water quality,	<1 week	-/+ impact increases supply
Environmental Monitoring	Implement WFD deterioration monitoring plans at sensitive waterbodies as required	Provides understanding of impact	resources	2-4 weeks	-/+
Maximise Supply availability	Maximise licenced outputs at sources where environmental risk is lowest	Increase supply estimate >3Ml/d	Constraints on sources	1-2 weeks	Possible -ive risk – will be monitored
Use of licence headroom	Maximise licenced outputs at sources where environmental risk is lowest	Increase supply estimate >7.4Ml/d	Environmental concerns	1 week	-ve risk potential- monitoring in place
Communications warning of likelihood of NEUB	Retailers/NAVs and NHH specific additional engagement	Prepares external stakeholders for NEUB	Keeping the message clear, customer pushback, increase in consumption before NEUB, economy challenges	1-2 weeks lead time	-/+ impact can increase demand temporarily; or increased demand management seen

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
Preparations for NEUB application	Prepare application to make ordinary drought order application to Defra	n/a	Board approval, Media attention, NHH customer contacts increase, economic challenges	1-2 weeks	+ive impact reduces demand
Low impact Drought Permits	Prepare to apply for any applicable drought permits	No permits in current plan			

Reducing demand

Our existing adaptable communications approach will continue at Level 2, with wider reaching campaigns focusing on informing customers that a temporary use ban is likely to be needed; this will include a text and email messages raising awareness of TUBs, the changes they can make to reduce water use and what we are doing to reduce demand though increased leakage efforts. This would continue through the implementation of TUBs, keeping customers well informed of the changing situation and circumstances to be aware of whilst a TUB is in effect.

If drought conditions continue to worsen during Level 2 then as our indicators are reached, we will prepare for additional measures to restrict non-essential use, which apply to non-domestic uses. Non-Essential Use bans (NEUBs) are implemented at Level 3, however from preparation to implementation takes longer than TUBs so this is commenced in the later stages of Level 2, to be ready for application of an ordinary drought order required to implement NEUB as soon as required at Level 3.

TUBS have been demonstrated to be significant in making demand reduction, and more effectively than many other campaign activities due to the mandatory nature. The benefits of TUBS are to reduce discretionary water use, predominantly from outdoor activities. Saving from TUBs as estimated by UKWIR research[2] range between 5% and 9.5% of household demands, although our experience from the 2011/12 drought[3] indicates that savings could be more than 10%. More recent research following the 2022 drought carried out by UKWIR[4] estimating a 3.3%- 6.6% saving, using data from six companies. This is an average and peak reductions are not assessed, therefore the impact of reduction on peak demand when TUBS are most effective could be greater. Other estimates of 5-14% have been made by larger water companies, so the 2022 reductions represent a later implementation of TUBS with relatively short-lived benefits of a few months in the year due to quick recovery for that event. The impact of TUBs in 2022 on household consumption was around 6.6%[5]. We are awaiting the UKWIR report reviewing the benefits of TUBs during the 2025 drought. We expect that a saving of 5Ml/d of saving is realistic, based on previous restrictions and available evidence.

The highest monthly average demand seen in the Cambridge WRZ was 98.3Ml/d in June of 2025 – a similar warm dry summer to that in 2022, when multiple heatwaves were declared. If a TUB had been implanted in a 2025 scenario, the savings that could be expected to this peak demand are at least 6.5Ml/d, and previous experiences in the Cambridge supply zone support a 5Ml/d reduction on average. As peak week demands for 2025 – the highest average weekly demand- were 108Ml/d this reduction would be allow demands to be met within our available supplies.

[2] Drought and Demand: Modelling the impact of Restrictions on Demand during Drought, UKWIR 07/WR/02/3

[3] Understanding the impacts of drought restrictions 14/WR/01/13, UKWIR, 2013.

[4] Review of 2022 Drought Demand Management Measures - Summary Report UKWIR 23/WR/02/18

[5] Review of 2022 Drought Demand Management Measures - Summary Report, UKWIR 23/WR/02/18

Protecting the environment

Within Level 2 status and typically alongside implementation of TUBs, we will begin implementation of site specific WFD monitoring to determine if there is any short-term deterioration to WFD status where we will be using our licences above the no/low risk as determined for WRMP24. This will include monitoring at groundwater locations and surface waterbodies associated with these abstractions. More specific detail on the environmental assessment, the waterbodies included and monitoring proposed is set out in section 6.

Actions to increase supply

Alongside formal restrictions we will continue the optimisation of supplies by halting any planned outages, and optimising our available abstractions and fully utilising available licences to maximise operational supply capacity. This would include measures to reduce the downtime associated with short term unplanned outages by increasing operational response team resources. Our drought incident team would ensure all preparations are made to mitigate short term unplanned outage caused by asset failure, power failures or treatment shutdowns with increased support for spares, alternatives such as on-site power generation, and ensuring supply chain resilience. It may be appropriate in some cases for temporary treatment or assets to be used to ensure we maintain maximum supply capacity, for example where water quality can become a constraint on source outputs during periods of low groundwater levels.

At Level 2 we would expect to consider the use of all licences at maximum allowed capacity, which would be above quantities proposed for future capping due to a potential risk to deterioration of WFD status. We have identified two sources when the headroom between low/no risk abstraction levels to full licence can provide an increase in supply, of up to 7.4Ml/d, and we would plan to make this available, by commencing the required environmental monitoring discussed later in section 6.

Maximising overall licence capacity can be achieved through operational activities or capital investment schemes. Capital schemes can either be accelerated (scheduled work undertaken earlier than planned) or new (work not currently planned to be undertaken) schemes. Typically, they allow us to abstract and move water to meet demand or increase the output or reliability of our groundwater sources. The list below provides a high-level summary of some of the opportunities for capital investment schemes that can potentially be realised from source performance tracking and identification of recommendations.

- Pump deepening, pump replacement or new pump installations to increase output or increase resilience.
- Recommissioning licensed borehole sources not currently in use.
- Other capital works including but not limited to borehole rehabilitation, pipework replacement, valve replacement or upgrading boosters.
- Changes in network configuration- for further maximisation during peak demand.
- Install new or additional treatment to overcome a water quality constraint.
- Software updates: – To set the site up in the best configuration to optimise output. – Upgrades- for the preferential use of a borehole(s) over another that may be less at risk at the same source.

The drought management team would also review any future capital schemes, or WRMP options that could be feasibly fast tracked so that lead in times to plan for these can be incorporated into Level 3 actions and evaluation of extreme drought option. This could include source recommissioning, additional boreholes or other feasible upgrades to WTW.

In addition to capital investment works, licence changes could be recommended. In these circumstances, we would need to prove we can achieve the increased output through a pumping test prior to preparing an application to the Environment Agency.

Stakeholder engagement

Once Level 2 drought status is reached, it is likely that the drought will also be affecting neighbouring water companies and Water UK will appoint a Drought Liaison Coordinator as an industry spokesperson and single point of national contact. At Level 2 we will provide guidance and FAQs for retailers and NAVs on the current situation and timings for expected implementation of TUBs, so that they can provide consistency with their own drought plans- this will build on the Communications already in place for Level 1.

We will use our stakeholder networks to further inform of the introduction of TUBS, share consistent messaging on restrictions, exemptions and the current and forecast drought situation. Retailers and NAVs will be advised in advance of restrictions once we have certainty of the date so that they are able to update their own communications accordingly. We will commence more detailed communications and updates with retailers and the non-household sector to apprise them of the changing situation and the risk of further restrictions to non-essential use if the drought progresses.

We will contact our customer base directly with information on the details of restrictions, timings and exemptions at the same time we publish the statutory notices on our website and in local media. Press releases will be prepared for the wider media.

Temporary use Bans

When considering a TUB, we will follow the requirements laid down in the relevant legislation and UKWIR's code of practice.[6] In particular, we will have regard to the following when implementing a TUB.

- A consistent and transparent approach.
- That water use restrictions are proportionate.
- Clear communications with customers and the wider public/users.
- Consideration of representations in a fair way.

We have adopted a form of notice for TUBs consistent with other WRE member companies in the region (see appendix D). This includes the standard exemptions and concessions that would be allowed, which are also consistent within the region. We would normally only implement TUBs during periods when they will reduce demand- for example, in the spring and summer. But this may vary as a drought becomes more serious. We would always implement a TUB before introducing supply measures and drought permits if applicable.

Timing and approach to implementation

We will follow the principles laid down in UKWIR's code of practice when considering how to implement temporary use restrictions. Preparation, internal communication and governance, and liaison with the Environment Agency, regional groups, and neighbouring water companies will have commenced in the latter stages of Level 1. Once we reach the trigger for consideration of TUBs, the drought management team will make recommendations to the board for approval on the exact timing of implementation before publishing the TUB notice.

Specific requirements regarding advertising for TUBs and Drought Orders are set out in the WIA 1991 and WRA 1991 respectively. Under the legislation set out in section 76B(5) of the WIA 1991 (as introduced by the FWMA 2010) all relevant notifications (relating to TUBs) must be published on the company's website and in two newspapers circulating in

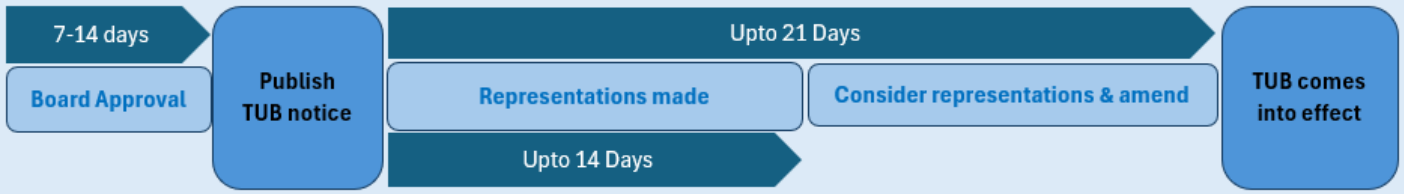
[6] Code of practice and guidance for water companies on water use restrictions 14/WR/33/6

the area to which it is to apply. We would, however, use other appropriate channels to communicate the TUBs notice, along with other supporting information through our Communications Plan, such as for example FAQs on TUBs and how to make representations. The lifting of any restrictions will also have to be notified in the same way, although the lifting of restrictions may take effect as soon as the notice to so is published. We will provide clear details of how to make representations on the proposed restrictions and give notice in the same way of any changes to the scope of restrictions, for example if new exceptions are allowed.

Once we publish the TUB notice, we will allow up to 21 days from the date of publication to the notice taking effect. We will aim to allow between 7-14 days for representations to be made. The drought management team will consider representations from individuals or groups in a fair and even-handed manner, and any decisions made communicated to both the individual or group and the public. We will also review and consider representations made whilst the restrictions are in effect.

These timescales can be reduced if there is deemed a particular need for more immediate action to reduce demand. As TUBS are most effective in spring and summer months, it is unlikely that we would implement them during autumn and winter. Timing will be an important consideration to ensure that we balance the need for demand reductions and impacts of these on customers and the economy with restrictions imposed when most appropriate. This is supported by UKWIR research which has identified that savings are less if TUBS are implemented later in summers, and implementation timing can be fundamental to effectiveness and considering the need vs disruption is an important factor in deciding when to implement TUBs.

TUB Timeline



Communicating restrictions

Any decision to introduce temporary restrictions will be made following comprehensive liaison with the Environment Agency, neighbouring water companies, WRE and other sectors to ensure a consistent approach across the region. As a drought situation develops, the frequency of these meetings and communications will be increased and joint communications and press releases will be issued, where appropriate for the situation.

Our website includes a drought status statement; this highlights the current groundwater situation and how this relates to any potential drought plan actions. While the emerging drought situation may differ for each water company in a particular region, and the timings for implementation of restrictions will depend on the local situation, we will endeavour as far as is practicable, to provide a consistent message to customers. We would expect a national drought management team to be convened for any regionally significant drought and for this to be a primary forum for the alignment of communications and activity by those companies involved.

Any proposal to introduce a temporary restriction will be advertised on our website (www.cambridge-water.co.uk) and in at least two local newspapers, as set out in legislation. We will make use of additional communication channels, both directly with stakeholders and more generally to customers, such as through social media. We will directly contact NAVs or insets, water retailers for business, and those other interest groups on our stakeholder register. We would undertake communications with NAVs and retailers from Level 1 trigger status, so that they are fully informed in the lead-up to

implementation of restrictions. This will be done through our specific liaison contacts for retailers, and public relations and technical team contacts. A variation, or subsequent lifting, of the restrictions will be similarly advertised, and communicated directly with the groups mentioned above. We will align the timing for implementing and lifting restrictions with neighbouring companies wherever possible.

To provide an audit trail, we will record all actions taken during the process of implementing restrictions. We will deal with any complaints through our normal complaint handling procedure. See appendix B for more detail about our communications plan.

Activities covered by restrictions

The range of water use activities that we can control under a TUB, together with supporting definitions is set out in the notice for TUBs (see appendix D). As set out in UKWIR's code of practice, this notice includes a list of standard exemptions.

We will also the following concessions from the outset of restrictions, these have been agreed regionally with other water companies for consistency:

- Blue badge holders will be included as Discretionary Universal Exemptions to the restrictions.
- The use of a hosepipe to fill or maintain a pond containing fish will be included as a Statutory Exception.

Activities restricted by a Temporary Use ban

Watering a garden using a hosepipe

Cleaning a private motor-vehicle using a hosepipe

Watering plants on domestic or other non-commercial premises using a hosepipe

Cleaning a private leisure boat using a hosepipe

Filling or maintaining a domestic swimming or paddling pool

Drawing water, using a hosepipe, for domestic recreational use

Filling or maintaining a domestic pond using a hosepipe

Filling or maintaining an ornamental fountain

Cleaning walls, or windows, of domestic premises using a hosepipe

Cleaning paths or patios using a hosepipe

Cleaning other artificial outdoor surfaces using a hosepipe

A garden includes parks or gardens open to the public, grass verges, grassed areas used for recreation and allotments.

Where other exceptions are proposed, we will state this in the notice, and update if required following consultation. There are no customer compensation payments applicable in the event of a TUB being implemented.

3.7 Level 3 actions

Reaching drought trigger Level 3 will mean we are in a significant drought situation. We have not had the need to resort to Level 3 actions in the history of the company, and our Levels of Service are for this to occur no more than once every 50 years. River flows are likely to be very low, with many reaches completely dry. This would have serious implications for ecological populations and recovery from this will take some time. Typically, we would consider the need for a drought order ahead of a third dry winter. Actions at this level are intended to reduce risks to supply caused by the drought, whilst maintaining environmental actions already in effect. We will actively and extensively engage with our customers and other stakeholders to ensure they are aware of the seriousness of the situation and will keep them updated regularly and would also be liaising with regulators and national/regional groups.

The actions set out under the previous trigger levels will be kept under review and will continue as appropriate through the development of a drought, including environmental monitoring to ensure we can mitigate impacts on the environment where possible.

At Level 3 we are likely to need to implement non-essential use bans in addition to the temporary use ban restrictions on our customers, although this will also depend on the time of year and any associated potential savings. The preparation and application to implement a NEUB will have mostly be completed within Level 2, so at Level 3 we are able to apply the drought order at an appropriate time following approvals to go ahead.

Table 6. Level 3 Actions

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
3a. Apply for NEUB	Make ordinary drought order application to Defra	None (possible negatives)	Board approval, Media attention, NHH customer contacts increase, economic challenges	2-3 weeks	+ive impact reduces demand
3a. Finalise NEUB	Consider any feedback on NEUB application and gain board approval to implement	None (possible negatives)	Requires approval from Secretary of State. Objections may require an inquiry or hearing	Approx 2-3 weeks, if inquiry or hearing required >3months	-ive impact can increase demand temporarily. +ive reduces demand via publicity
3a. Implement NEUB	NEUB comes into effect	2Ml/d	Requires approval from Secretary of State	Approx. 3 weeks	+ive reduces demand
3a. Maximise Supply availability	Consider acceleration of capital schemes or WRMP options where feasible	Varies	Resources, cost, permits/licences, planning	considerable	-/+ depends on options
Other Drought Permits	Prepare to apply for any applicable drought permits	No permits in current plan			

Action	Description	Estimated savings or benefits	Risks and barriers	Implementation timescale	Environmental impacts
3b. All possible options to avoid emergency drought orders	Extreme drought options	Varies – see extreme options section			

Actions to reduce demand

Further formal restrictions on water use can be made through a Non-Essential Use Ban (NEUB) which allows us to further restrict non-essential water use at commercial and institutional premises under the Water Resources Act 1991 Sections 74(2)(b). For this we must apply to the secretary of state for the approval of an ordinary drought order, as per sections 73 and 74 of the water resources Act 1991, and the secretary of state must be satisfied that a "serious deficiency of supplies in an area" exists, by "reason of an exceptional shortage of rain".

In our plan we do not propose to use any other ordinary drought order provisions within section 74 that may have an impact on the environment, such as taking water from any source subject to conditions or suspending or modification of restrictions relating to abstraction of water. Non- essential use restrictions are more wide-ranging than those included in a TUB and in addition to domestic customers, these restrictions would also affect commercial customers and businesses.

The range of purposes to which drought orders apply are as follows:

- Watering outdoor plants on commercial premises.
- Filling or maintaining a non-domestic swimming pool or paddling pool.
- Filling or maintaining a pond for ornamental use.
- Operating a mechanical vehicle washer.
- Cleaning any vehicle boat aircraft or railway rolling stock.
- Cleaning non-domestic premises.
- Cleaning a window of a non-domestic building.
- Cleaning industrial plant.
- Supressing dust.
- Operating automatic cisterns in unoccupied or closed buildings.

Before submitting an ordinary drought order application, we would discuss the need for such a measure with Defra as well as the Environment Agency and we would make sure that TUBS are being as effective as possible. The application process requires us to state the reasons and present our case for the need for restrictions including how an exceptional shortage of rainfall is likely to lead to a serious deficiency in water supply. Following our application, if any objections are received, the Secretary of State would hold a local inquiry or hearing unless they consider that the drought order must be made urgently.

Considering the timescales involved in preparing an application and granting an order could take 3-6 months; experience from previous droughts suggests 3 months from advertising the intention for a drought order to receiving notice of the order, and our triggers reflect the time required with planning for a drought order commencing in Level 2 for timely implementation at Level 3. As with TUBs, the timing of NEUBs being implemented will be considered as the time of year will influence how effective they are vs. the impact on commercial customers.

The stages required to implement a drought order are as follows:

1. **Preparing and lodging an application.** This includes publishing adverts in the press, followed by an application to the Secretary of State, including reasons for requiring the drought order, supporting evidence and information. There is a seven-day period for objections to be made.

2. **Hearings or inquiries.** If any objections are received, the Secretary of State will hold an inquiry or hearing. A seven day period is required to advertise the hearing.

3. **Implementation**. Once approved, the water company must again advertise the implementation of the granted drought order. It is not possible to be any more specific here on exemptions and concessions, as the range of drought order restrictions will vary according to the specific circumstances of a particular drought. However, we will follow the requirements of the relevant legislation and guidance. This includes Defra's guidance on drought permits and drought orders[7] and the principles laid down in UKWIR's code of practice. This is to ensure that our proposals are consistent, proportionate, and clearly communicated, and that any objections are considered fairly.

Drought permits to restrict water taken for certain purposes, or to increase the amount of water that can take could also be utilised at Level 3, however we have no proposed drought permits in our plan.

Drought orders and permits

Drought orders and permits give us additional flexibility to manage our water resources for water supply. The Environment Agency can grant drought orders to prohibit, limit, or allow modification by us, or the Agency to discharge, take or supply water to specific locations. Testing of our drought triggers and actions indicates that ordinary drought orders for the restriction of non-essential use would only be required in a severe drought because of three dry winters- conditions we have not experienced to date. As a result, the only permits, or approvals that we rely on in this plan are those for NEUBs. We discuss any further actions we might consider, such as extreme drought measures in section 4.

The Environment Agency can grant drought permits[8] to allow us to take additional water from sources, by modifying or suspending of conditions on, an abstraction licence. This plan does not include the option for us to improve our supply capability by taking additional water using drought permits. We consider this would only be necessary in extreme conditions, as previously described.

Actions to increase supply

By Level 3 we will have utilised available options to increase supply, and will be exploring any additional feasible options, these will include extreme drought options and accelerating any schemes that we might have in our capital plan or WRMP. However, it is likely that the lead time for many of these, which is accounted for at Level 2, could be many months.

By the time a drought has reached the severity of Level 3 actions it is possible that some of our sources would be restricted by groundwater levels, pumping and abstraction assets. A key area for supply would be maintaining the outputs where these issues could arise, and this could involve changing assets, for example lowering pumps or installing temporary treatment to address changes in water quality or increase outputs. The feasibility of these would have been considered at level 2 so that in level 3 we can progress with any that would provide supply benefits.

[7] Drought permits and drought orders, Defra, May 2011, www.gov.uk.

[8] Granted under the Water Resources Act 1991, Section 79a, as amended by Environment Agency 1995

Stakeholder engagement

There would be significant engagement with multiple stakeholders at Level 3, with a majority of this via national or combined groups. Our Drought management team will inform these groups, as well as supporting direct communications as necessary. We would have internal briefings as well as external communications on at least a weekly basis to ensure that all affected operational teams and stakeholders are fully apprised of the situation, and any changes.

Key stakeholders at Level 3 are retailers and NAVS as the non-household and commercial sectors would be impacted if NEUBs are implemented. Whilst this would have commenced at Level 2, the engagement in Level 3 would shift to the impacts of restrictions and our regular meetings with this sector would be supported with a dedicated internal stakeholder representative, to ensure that our plan is aligned with retailers/NAV plans and that actions are being applied consistently.

3.8 Level 4 actions

The water resources and climatic indicators associated with the Level 4 trigger have not been reached in the historic data records and are therefore extremely unlikely and would represent an unprecedented extremely serious drought of a magnitude not previously experienced. Our level of service for the risk of rota cuts or use of standpipes is on average less than once in 500 years.

At Level 4 we can resort to the use of Emergency Drought Orders that would allow us to further prohibit water use through rota cuts, and to supply water through standpipes or water tanks. Details of Level 4 actions will be included in a future Emergency Drought Plan (EDP) which would supplement our existing emergency planning arrangements. The first drafts of these EDPs will be published for review by the Environment Agency in the summer of 2026 and will be integrated into the revised draft and final drought plans. These emergency plans would be invoked by the Drought Management incident team for Level 4, together with an Incident team. We may seek additional support under the Civil Contingencies Act to avoid rota cuts and standpipes being required. Drought plan guidance confirms that drought plans do not need to include details of arrangements for providing water supplies to cope with situations when there is a civil emergency because of water shortage.

4. Extreme drought actions

The drought management actions outlined in this plan would allow us to manage a progressive drought sequence like those historically experienced – up to two dry winters - and beyond into a more severe three dry winter drought not experienced before. We have identified several further actions that would be available to us typically at Level 3, which are technically and practically feasible. Many of these would be temporary and not constitute a permanent increase to supply or deployable output.

1.1 Options Considered

Extreme drought actions would only be considered for use where we have implemented all our previously detailed actions, yet the severity of the drought is progressing. The options we have considered are summarised in table 7 below. Where these would require a drought order or permit application, we would have carried out some environmental assessment in advance to provide an early indication of the measures that might be required – for example, mitigation, monitoring or recovery activities. This enables us to understand when the likely triggers for these options with a lead-in time are likely to be, into Level 3 drought and before Level 4. These would be considered for the entire WRZ, although some may be more appropriate to specific demand centres, which would be assessed at the time.

Table 7. Extreme drought options (Level 3b)

Type of action	Summary	Estimated savings Ml/d	Risks and barriers	Likely trigger timescales	Environmental impacts	Priority (1 to 5)
Demand actions						
Removal of exemptions	Removing exemptions from TUBs/ NEUBs	0.2- 0.5	negative PR from restricting use from disabled and/ or vulnerable customers, disproportionate impact for savings. Health and safety concerns	6-8 weeks	None	1
Tariff changes	Higher tariffs for use over an allowed threshold, reward or incentive schemes for reducing pcc	0.5-1.0	Customer acceptability. Financial regulatory approval, voluntary only and therefore negligible savings over communications and awareness campaigns	3-6 months	None	2
Media and communications	Hard hitting messages - Social unacceptability of excessive water use, prosecutions for	0.5-1.0	Water efficiency messaging fatigue, unpopular messages negative feedback backlash, unwillingness to change	2-3 weeks	none	5

Type of action	Summary	Estimated savings Ml/d	Risks and barriers	Likely trigger timescales	Environmental impacts	Priority (1 to 5)
	breach of TUB or NEUB restrictions, Day Zero language					
Relocation of water users	Relocate certain commercial large users, such as farm stock or other business to area without drought impact	>10	Feasibility on engaging with other sectors (farming, manufacturing), scale of compensation, feasibility of relocating, availability of water resources elsewhere	3-6 months	Carbon costs	1
Shut down of manufacturing/ large users	Appeals for commercial large users to cease water using activities	4.5-5.5	Feasibility on engaging with other sectors (farming, manufacturing), scale of compensation,	3-6 months	None	1
Non-potable use	Capture of water for re-use at scale or in domestic setting, rainwater capture systems to prevent losses	0.5-2.0	Volume for re-use, purposes appropriate for non-potable use, water quality concerns, health. Resources and assets to deploy and effectively use. Meteorological reliance.	3-6 months	None	3
Supply actions						
Compensation flow reduction – Linton	Drought order/permit for temporary removal of licence conditions	1.9-2.7	Environmental impacts, risk to WFD objectives	Drought permit timescales	significant	3
Compensation flow reduction – Rivey	Drought order/permit for temporary removal of licence conditions	1.2-2.8	Environmental impacts, risk to WFD objectives	Drought permit timescales	significant	3
Compensation flow reduction – Babraham	Drought order/permit for temporary removal of licence conditions	1.9	Environmental impacts, risk to WFD objectives	Drought permit timescales	moderate	3

Type of action	Summary	Estimated savings Ml/d	Risks and barriers	Likely trigger timescales	Environmental impacts	Priority (1 to 5)
Recommission obsolete sources – Lowerfield	Refurbish BH source and use as non-potable supply	0.6	Environmental impacts WFD objectives	6-12 months	moderate	4
Transfer/trades with other companies	Short term transfers or trades with neighbouring companies or other sectors	>2.5	Transfers with other companies would already be explored to capacity if resource available. Other sectors would require infrastructure and treatment, unlikely to be from a more drought resilient or secure resources, Water availability	1-3 months	Low	4
Tankering	Moving water from areas with surplus and injecting into networks or storage	0.5-1.0 (per location depending on capacity)	Water availability, road tanker availability sea tankering arrangements, transportation and resourcing issues, Water quality concerns, limited localised benefits	1-3 months	Carbon costs	2
Supply schemes	Fast track WRMP or WRE schemes	1.0+	Significant infrastructure lead times, planning	6months minimum	moderate	4
Effluent re-use	Redirecting discharges to supply for potable or non-potable use	0.2-1.0 (per location)	Infrastructure requirements, liaison with WWTW operators, water quality, perception, treatment requirements.	3-6months	moderate	3
Network changes	Overland or temporary pipelines for new supplies	<1.0	Resource availability, water quality and treatment requirements.	1-2 months	Low	3

5. Customer communications

This section explains our approach to customer communications during an emerging drought. Customers include domestic customers, commercial customers, retailers, regulators and other stakeholders. The approach we describe has adapted and developed as we gain insights into what works best, and it remains an agile and adaptive plan to achieve the best outcomes.

5.1 Overview

Effective communication is an essential part of drought management, and we recognise the importance of keeping stakeholders and customers informed, before, during and after a drought. Our communications plan aims to ensure all stakeholders and customers are aware of the drought situation, our plans and actions throughout a drought, and to maximise the demand management savings that can be achieved by doing so. The types of communications tools that we use, stakeholders and audiences is set out in our Communications plan in appendix B and within this plan against actions for each drought level.

A key message that we are committed to always convey is the need to use water wisely and efficiently, and this message is shared as business as usual, with an increasing level of activity, engagement and information with stakeholders and customers as a drought progresses. We will use a variety of methods to communicate messages as deemed appropriate by the drought management team.

The objectives of the communications plan are to:

- Make the public aware of a developing drought situation and keep them informed of the measures that we are planning, explaining the need to save water and our efforts to encourage customers to help.
- Link the risks of drought with the environment, the impact that it can have and how customers actions to save water can directly help the environment.
- Provide information on and promote escalated water efficiency messages to mitigate the need for restrictions, and reduce demand, lessening the likelihood of further restrictions.
- Inform customers of any restrictions that we may deem necessary to implement during a drought situation, in advance of implementation, information on when they will happen, possible exemptions, and the impact of their efforts.
- Manage the timing and targeting of communications as stages of a drought progress.
- Provide a concise and consistent message relating to drought for all water consumers in the affected area, by working with neighbouring water companies, and regional and national groups.

Our communications strategy is not meant to be prescriptive; rather, it is an adaptable and agile framework.

For a drought with more widespread impacts, the Environment Agency, National Drought Group, WRE and others will co-ordinate additional communications at a national and regional level – our drought management team will feedback into these organisations.

5.2 Communications Plan triggers

The activities described in our communications plan are linked to the drought triggers set out in the table below. The actual messages and channels we will use are flexible and can be adapted as appropriate at each stage of a drought.

Table 8. Communications Plan actions

Drought Level	Messaging	Implementation time
Normal	Business as usual (BAU) • Proactive water efficiency awareness and education.	Ongoing
Environmental Stress	• Situation assessment and status – potential to worsen. • Enhanced water efficiency promotion, e.g. promotion of switching to a water meter, thinking about how much water is used in certain activities and whether they are necessary. • What we are doing to manage demands and protect the environment, e.g. our leakage commitment and our PEBBLE biodiversity initiative. • Engagement with local site managers and interest groups. • Bespoke education, advice and awareness visits where we can help the local environment.	1-2 weeks
Trigger Level 1	• Situation assessment and status – increasing severity. • Continued promotion of water efficiency, switching to a meter, water use in certain activities, and highlighting water wastage. • What we are doing to manage increased demand and protect the environment - and how customers can help. • Leakage levels and updates on demand and demand management effectiveness. • Enhanced metering campaign. • Bespoke education, advice and awareness visits. • Updates on our groundwater levels and license agreements. • Appeals for restraint, highlighting the potential for temporary usage bans. • Updates on environmental support schemes.	From one week, up to four weeks, depending on activity being implemented
Trigger Level 2	• Situation assessment and status – increasing urgency of messages. • Implementation of a temporary usage ban. • Updates on what activities are and aren't prohibited in the region. • Further appeals for restraint on excessive water use. • What we are doing to manage demand and protect the environment. • Leakage levels and updates on demand and demand management effectiveness. • Continuation of metering campaign. • Bespoke education, advice and awareness visits. • Updates on groundwater levels and license agreements.	From one week, up to four weeks, depending on activity being implemented
Trigger Level 3a)	• Situation assessment and status – increasing urgency of messages. • National messages on usage restrictions and activities. • Consultation for the ordinary drought order. • Information on implementation of non-essential use, activities restricted, exemptions, compensation arrangements. • Updates on regional and national water resource position. • Implementation of ordinary drought order NEUB. • Environmental urgency, day zero type messaging. • Implement drought permits – stakeholder and regulator communications. • Prepare for emergency drought order (EDO)Impacts of rota cuts.	Up to one week

Drought Level	Messaging	Implementation time
Trigger Level 3b All possible actions to avoid EDOs	• Updates on regional and national water resource position. • Environmental urgency, day zero type messaging. • Impacts of rota cuts, standpipes. • Explore extreme drought options – stakeholder engagement.	From one week, up to four weeks, depending on activity being implemented
Trigger Level 4 Drought Emergency Plan	• Emergency Drought Order – National and Government-led messaging.	From one week, up to four weeks, depending on activity being implemented
End of Drought	Consultation and liaison on the relaxation/ withdrawal of any ban. Proactive water efficiency awareness and education. Thanks to customers for their efforts. Information on the effectiveness of measures and water savings.	Within one week

Vulnerable Customers

We are mindful of the importance that we communicate to our customers in vulnerable circumstances, and provide additional support when needed. Our priority services register is designed for customers with particular needs relating to their water use. The register enables us to identify households which require additional communications and we can get in touch with customers using the most appropriate method, to ensure they are aware of and fully understand the situation. These communications will be used in the event of needing to implement temporary use restrictions, and will help to ensure those customers understand what the restrictions mean, and more importantly in which cases they will be exempt. FAQs tailored for more vulnerable customers. Most activities restricted under temporary use bans (TUBs) or non-essential use bans (NEUBs) have associated exemptions for health and safety reasons, which in many cases includes uses by customers on our priority services register.

Retailers and non-household customers

Our communications strategy recognises the importance of collaborating with retailers and NAVs so that they are informed of the water resources situation, and the current drought plan status so that they can align their own plans and communications to customers. We will work with retailers and NAVs through regional (WRE) and national (WaterUK) liaison contacts as well as directly as required. If we reach the triggers for restrictions in our drought plan, then the level of coordination will increase with more regular liaison.

As part of our commitment to retailers and NAVS we will provide the following:

- Regular updates on the water resources situation, monthly then weekly as a drought progresses.
- A dedicated liaison single point of contact for any issues arising following drought plan activation.
- Access to our tailored water efficiency information and FAQs on TUBS and NEUBs.
- Industry specific advice and water using data for reducing demand in the non-household properties sectors.
- Data analysis of consumption patterns and targeting high use customers.
- Advance notice of the need for any restrictions so that drought plans can be aligned.

Measuring success

We will use available data to determine and validate the success of water saving actions throughout a drought. The data used will vary depending on the severity of drought and how far we have progressed through the drought triggers, but would include:

- Overall customer demand vs typical and antecedent conditions.
- District Metered area (DMA) demand reductions vs typical.
- Customer meter readings.
- Retailer and non-household customer meter readings.
- Data loggers deployed into high water use areas or for large water consumers.
- Water balance consolidation.

Monitoring the reach of our communications

Depending on the method of communication deployed, there are various levels of qualitative and quantitative data that can be used to determine the reach of our communications. Where we are using customer contact details provided to us, we can quantify the number of messages sent out, but not measure the direct benefit of these. Other channels such as those online, allow us to determine the reach of the messages and how engaged the interactions are, for example where links are followed or media messages shared.

We can also undertake customer research and surveys that complement our usual outreach programmes which include specific questions to customers on how we performed during a drought and how the communications messaging landed. This can also be a useful indicator of the effectiveness of our communications during a drought, but these do require some specific planning to be rolled out, and may be most appropriate for a more significant drought event with wider impacts and requiring more intense communications. We may do ad hoc quantitative feedback requests on our email communication to understand whether our messaging is appropriate.

6. Environmental assessment

This section explains the environmental requirements and expectations for a drought plan and in legislation. It sets out the environmental monitoring that we would plan to undertake during a drought, how our drought actions could impact the environment and what mitigation we would put in place.

6.1 Overview

To ensure minimum environmental impact from our supply-side drought management actions, there is a requirement to monitor and assess the impact of these activities. The Environment Agency provides guidance on the recommended approach[9], which we have followed in producing this plan.

Our current plan does not propose any supply-side drought orders, drought permits or temporary water transfers; our supply actions use existing water sources available under our abstraction licences. The use of abstraction licences over and above recent volumes up to full licenced abstraction volumes has been identified as a risk to achieving WFD objectives through WINEP. So, we will carry out specific environmental monitoring when increasing abstractions above historic rates.

We will also have due regard to designated sites, priority habitats and other protected areas that may be impacted. Designated sites include Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), and Local Nature Reserves.

6.2 Environmental Assessments

We have followed the Environment Agency's guidance on environmental assessments, identifying likely changes to flows and impacts from our supply-side actions on the environment and assessing the sensitivity any likely impact. This follows the approach set out in the guidelines shown in figure 8 below.

This drought plan includes an assessment of:

- the likely impact of implementing supply-side options,
- the likely impact from the increased use of existing licences,
- details of permits required to implement any options,
- the risks of implementing any supply-side options, and
- monitoring and mitigation actions required for any drought management action.

We explain our approach in more detail in in appendix E.

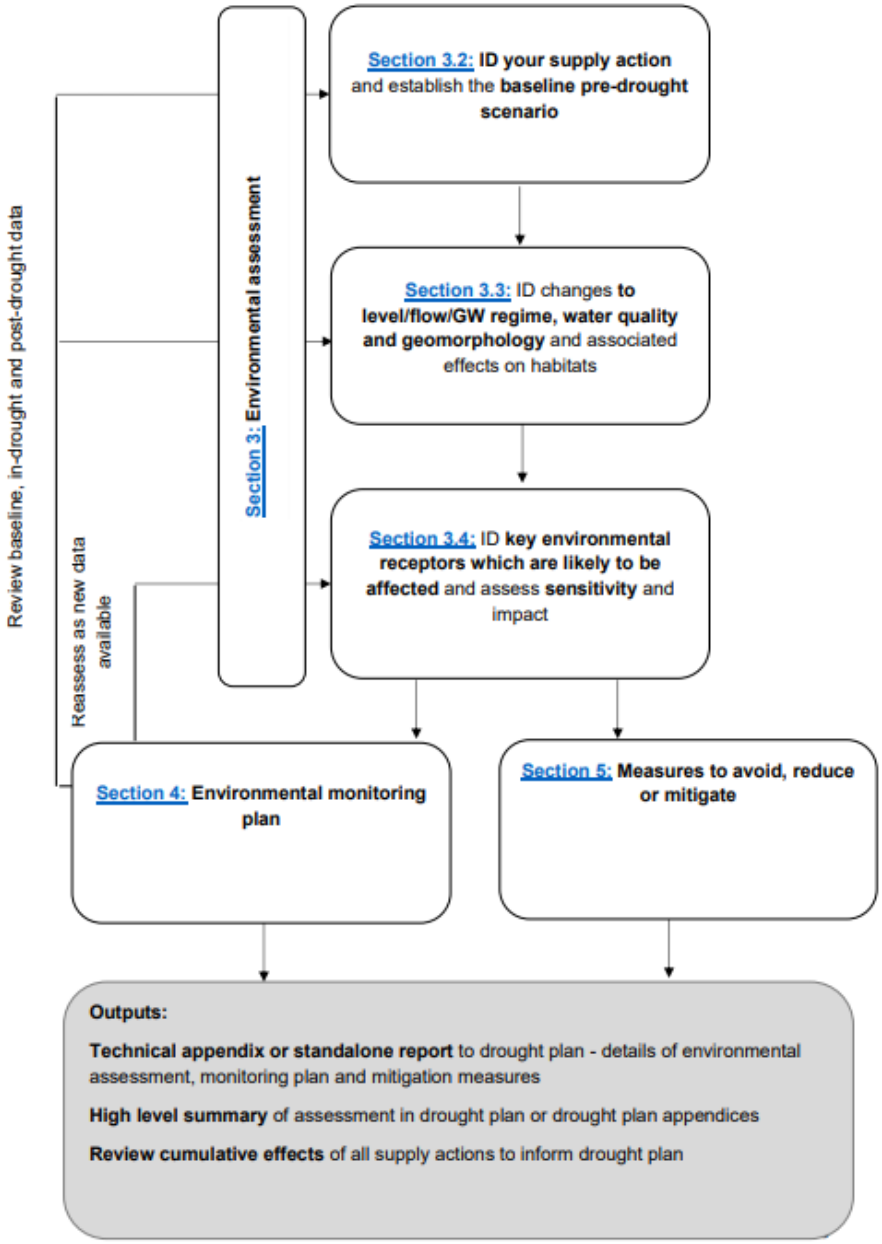
As a result of our assessments, we have produced several environmental monitoring plans to assess the impact of implementing our supply-side actions to optimise licenced abstraction and of utilising existing licence headroom, focused on surface water bodies identified through the WINEP review of our abstractions. We have assessed the environmental impact against the WFD requirements[10] by means of changes in flow regime that could impact ecological status. These drought actions are expected to be required at level 2 and into Level 3 and will be assessed on a least-worse basis for

[9] Environmental Assessment for Water Company Drought Planning, Supplementary Guidance, Environment Agency, 2025.

[10] Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations) , UK SI No. 407.

prioritisation of use to minimise environmental risk. We would always endeavour to implement demand management, in particular TUBS before using any licenced headroom that poses a medium-high risk to the environment.

Figure 10. Approach to environmental assessment



Source: Environmental assessment for water company drought planning – supplementary guidance, Environment Agency, September 2025.

6.3 Use of existing licensed headroom

Our WRMP includes demand management and other options that ensure we do not increase the overall volume of water that we abstract from the chalk aquifer on a permanent basis over the plan period. In addition, the supply demand balance in the plan includes indicative sustainability reductions to prevent any risk of deterioration to WFD status. However, we maintain licensed volumes to abstract without the requirement of drought permits, with headroom equivalent to those reductions included in our WRMP.

Under normal operational conditions, the potential requirement for supply options of this magnitude would not be expected until at least drought trigger Level 2, and into Trigger Level 3, and would be following applications for demand

manage measures to be in effect. While using this licenced headroom will not require application for a drought permit, where a risk of deterioration of WFD standards is a reason for an indicative sustainability reduction, we will ensure that there is no deterioration from increasing abstraction, except in circumstances in which Article 4.6 of the WFD might be applicable.

In our final WRMP we have include the outcomes of additional work carried out across all our chalk groundwater sources to assess where the threshold for increased risk of deterioration would be under various abstraction scenarios. This has provided maximum sustained average abstraction rates across all our sources which would not pose a risk of deterioration. For this drought plan we have identified two locations where using licenced abstraction volumes above those planned for a typical year could increase the risk of deterioration at surface water bodies, but where we may need to implement the option of using licenced headroom. For these two locations, we are developing additional in-depth environmental action plans so that we can monitor the risk of deterioration and other impacts to the water courses and ecology.

The environmental assessments set out in appendix E demonstrate how we would go about monitoring any environmental impact and plan for appropriate mitigation of any impacts, and Appendix E includes the Environmental Action Plans (EAPs) for the two locations with increased risk. This monitoring will continue whilst the drought options are in effect, and the monitoring triggers indicate an increased risk to WFD status. The action plans will develop detailed monitoring approaches in liaison with the EA and other stakeholders through the consultation of this plan, for publication in full for our revised draft plan. Our review of possible supply actions in producing this plan has determined that the risk of environmental impact from these is considerably lower than would be expected from any drought permits. We would expect any futures changes to deployable output because of licence changes to be offset by new regional supply options, or by drought permits to access the previously licenced volumes. If these changes are made, they would be reflected in subsequent drought plan publications.

Assessment of environmental risk

Any deterioration to WFD status of the groundwater body would be of a temporary nature, and any significant impact because of groundwater deterioration would be to the status class of the surface water bodies and ecology. We would only expect to need this action at Level 2- Level 3, following appropriate demand management measures and in exceptional drought circumstances.

As any impact would be to surface water bodies, and the supported ecology, we have carried out assessments and produced environment monitoring plans for the following water bodies, which are supported by groundwater base flows. The water bodies in the catchment are:

- River Granta.
- Millbridge Common.
- Cherry Hinton Brook.
- Hobsons Brook.
- Little Ouse, River Thet and Sapiston River.

Our assessments describe the proposed baseline, and during and post-drought monitoring for groundwater sources identified in the WINEP for which it may be necessary to increase use above recent abstraction but within existing licence conditions, and where this may cause a risk of deterioration.

The reports include the type of monitoring required, proposed locations, frequency, and duration before during and after the supply drought action is implemented. Monitoring will continue until recovery from drought is observed, typically no longer than 6 months once our triggers are at BAU.

For the two sources where increases in abstraction could pose a higher risk of deterioration for which we have included EAPs, these will be developed in detail through the consultation period. Monitoring will continue for no longer than 6 months following the abstractions are returned to low risk levels or the impacted elements have returned to normal (flow and levels). The water bodies concerned are:

- Bottisham Lode-Quy Water
- Swaffham-Bulbeck Lode

We do not consider that these actions, or any of our actions in this plan would impact on cultural or heritage sites, the spread of non-native species, water quality or biodiversity under the Natural Environment and Rural Communities Act 2006.

Habitats Regulations assessment

The EU Habitats Directive was transposed into UK law by the Habitats Regulations 1994. The Regulations require a Habitats Regulations Assessment (HRA) to be conducted to determine whether plans are likely to have a significant effect on European Sites, including Special Areas for Conservation (SACs), candidate SACS (cSACs), Special Protection Areas (SPAs) and Ramsar sites (Wetlands of international importance).

We have conducted screening to fulfil our Habitats Regulations obligations. Our supply actions do not propose increasing abstraction at any sources where Habitats Regulations sites may be affected, so we have determined that the plan is unlikely to have a significant effect on a European Site, and that an Appropriate Assessment, under the Habitats Regulations, is not required.

Strategic Environmental Assessment

European Directive 2001/42/EC, otherwise known as the Strategic Environmental Assessment or SEA Directive, requires the “assessment of the effects of certain plans and programmes on the environment”. Water companies, as responsible authorities, must determine if their drought plans fall within the scope of the SEA Directive. We have applied government[11] and industry guidance in the decision-making process to determine the requirement for an SEA for this plan.

Having followed this guidance, it is our conclusion that an SEA is not required in respect of this drought plan.

[11] A Practical Guide to the Strategic Environmental Assessment, ODPM, 2005.

7. Recovery from drought

This section explains how we identify the end of a drought with sufficient confidence that the situation has returned to normal, and the actions that we would carry out towards the end of, and after a drought has ended.

7.1 Identifying the end of a drought

The end of a drought can be defined as the period when the risk of impacts from drought is no greater than during a normal year, and where normal conditions have continued for a period. Each drought sequence is different, and to determine the end of a drought we will use the observations and data captured in our drought management tool to inform our decisions. We would normally expect a drought event to have ended when we are no longer in trigger Level 1, however there can be residual environmental stress when recovering from drought, and our triggers also reflect this, and our environmental monitoring and actions would most likely continue.

With a groundwater sourced supply system, it is important to note that it may require several months of above LTA rainfall for recovery from a prolonged groundwater drought scenario. Therefore, it may be necessary for restrictions to be in place whilst groundwater levels fully cover, even with weather that does not represent what is expected for drought conditions. This poses a requirement for careful communications with our customers, to explain the improving situation and clarify when recovery is complete, including that continued water efficiency post drought is important.

Triggers for the end of drought

The key triggers and indicators than inform the recovery from drought are presented in table xx below.

Table 9. End of drought triggers

Drought Level	Drought Triggers	Drought indicators	Actions
Normal	Business as usual.	No SPI, SPEI, GW or flow thresholds reached.	Routine demand management messaging, normal operations.
End of drought	Leave level 1 to environmental stress	All 12 month SPI above -0.5; AND All GW level above 1 in 5 year.	Normal supply operations, environmental stress measures remain.
	Leave environmental stress actions	12 month SPI for current river(s) above 0; AND All rivers above their 30-day triggers.	Return to BAU - Thank customers and stakeholders. Normal operations/recovery.

It is important in a prolonged drought to ensure confidence in sufficient sustained recovery in resources before the end of a drought is declared, and when drought measures are lifted. 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. We would expect to liaise closely with the Environment Agency and other water companies to align our decisions with the regional situation as far as is practical and to complement the Environment Agency's and regional position on drought status.

Lifting of Restrictions

Ending drought management actions is likely to be made progressively, in accordance with our triggers and indicators, although we are committed to removing any restrictions on customer use through TUBs or ordinary drought orders as soon as is reasonably practical where the impacts on managing the drought would not be outweighed by those on our customers' activities. We will consider the status of our triggers, time of year and forward-looking meteorological outlooks before lifting restrictions.

The lifting of restrictions requires notification to be published on our website and in two newspapers circulating in the affected areas. Unlike the imposition of restrictions, there is no lead in time or consultation required and restrictions will be lifted immediately when the notice is given. We would look to alignment with neighbouring water companies when lifting restrictions, and with regional communication.

Environmental Monitoring

The monitoring that would have commenced at different levels of the plan may continue beyond the end of drought, to monitor the ecological recovery or confirm no actual deterioration to WFD status has occurred. Continuation of enhanced environmental monitoring may last for up to 12 months, possibly longer where specific reasons would justify it.

Stakeholder Engagement

We will aim to inform customers and stakeholders in a timely manner when the situation has returned to normal. Restrictions may remain in place as a drought situation heads through recovery to ensure consistent messages and maximise the benefits of water saving; however, we will inform customers within a week of restrictions being lifted through multiple channels.

Following a drought of any severity, we will thank all customers and stakeholders for their efforts in reducing water use, and for supporting us through the drought. Following our post drought review, we will publish our lessons learnt report and information on the effectiveness of our drought actions and water savings measures.

7.2 Post-drought actions

The drought management team will be responsible for stepping down or stopping any ongoing drought actions such as restrictions, once approval has been provided. There are several post drought actions that would be taken, alongside regular reviews.

Post drought review

Should a drought event occur, we will conduct a timely post-drought review, which will examine the effectiveness of our drought plan in specific areas, including the following.

- Environmental monitoring during and after drought – was it appropriate and effective?
- Drought management actions – were they successful, what was their quantifiable effect in reducing demand?
- Performance of sources – did deployable output and yields meet expectations?
- Demand measures – were the savings realised as expected, and were these effective during periods when most required?

- Were any strategic investments made which might have a material effect on other plans?
- What was the cost of implementing drought actions?
- Was our communications strategy effective in changing customer behaviours?
- Any other lessons learnt from the experience of the drought, and review of data.

Not every drought event will extend long enough that all the above are required, and the detail would be more comprehensive post level 2, the list above is also not meant to be exhaustive.

Our lesson learnt review will be signed off by the Director of Strategy and Regulation, and will take account of pre drought, drought and post drought, alongside experiences of implementing drought actions across the various parts of the business responsible for implementing these

We will work closely with the Environment Agency and with other key stakeholders to produce our review as appropriate. We will conduct our review within three months after the end of a drought, and we will produce a 'lessons learned' report within three months after that. We will follow this, within a further 12 months, by a monitoring report update on any actions identified and taken. Any significant learning arising from our reviews that leads to changes in our approach to implementing drought actions or managing a drought situation could trigger a revised and updated plan. The lessons learnt review for 2025 is included in Appendix G and has informed this draft revised plan.

Drought plan updates and health check

Once a drought has ended, we will use the post drought review findings and lesson learnt to refine and improve our plans if required due to any recommendations arising. This could require updates to the drought plan, and if they are significant and constitute a material change, then this may include producing a revised draft plan and undertaking consultation on a revised plan. We would always do this every five years, or if directed to by the Secretary of State for Defra. Changes to our drought plan may require updates to the WRMP, which would be published as part of the WRMP Annual Review.

Regardless of drought or dry weather, we will undertake a drought plan health check annually. This is an opportunity ensure the actions presented in our drought plan have not changed, and to identify any updates that may be required. In a year without drought, we may undertake a drought exercise to assess elements of our drought plan or emergency drought plan. This review will be shared with the Environment Agency, and published on our website where any significant changes are identified.

8. Additional information

This section includes additional information that supports our drought plan and drought activities, which the guidance requires us to include, relating to transfer opportunities, compensation and support for other sectors that may be impacted during a drought.

8.1 Bulk Transfers

We currently supply and receive small volumes of water to and from neighbouring water companies at the boundaries of our supply area. These routine supplies are defined by bulk supply agreements between the two companies. The maximum volume that we currently import is 0.05Ml/d, and we can export agreed volumes of up to 0.25Ml/d and 0.37Ml/d, although actual utilisation varies from year to year and seasonally. There is little scope for optimising these small quantities in drought conditions as it would normally affect the neighbouring companies in a similar manner. These bulk supplies are made under standard commercial terms, and the volumes are either stated in a commercial agreement, or subject to connection size limits under our commercial charging scheme, and consumer demands. These would be in place for the range of droughts being assessed by this plan.

An additional bulk supply arrangement allows water to be transferred to a neighbouring company in an operational emergency. This supply cannot be maintained during a drought and would not be provided once trigger Level 2 is reached, as per the commercial agreement in place. We would not rely on emergency drought supplies from neighbouring companies in a serious drought but may consider them in the short term while other options are implemented.

As part of our communication with other water companies, we will review and update the position and availability of transfers. These transfers are detailed below.

Table 10. Bulk supplies

Name & Type	Receiving / Donor Company	Volume agreed	Transfer limits Ml/d	Description
Odsey (import)	Affinity	Demand based – typical 0.05	0.05	Continuous
Hadstock (export)	Affinity	Demand based – typical 0.37	1.0	Continuous
Earith Bridge	Anglian	Demand based – typical 0.01	0.5	Continuous
Barnham X	Anglian	0.25	2.5	Continuous

We also provide a supply to a commercial customer outside of our supply area, which is used seasonally. We would engage with this customer once trigger Level 2 is reached to reduce the use of this supply before implementing an ordinary drought order, which would legally restrict its use. The potential savings of 1Ml/d are in addition to those estimated for an ordinary drought order.

8.2 Compensation arrangement for drought measures

Unless it is judged unreasonable by virtue of exceptional circumstances, if customers' supplies were to be interrupted or cut off under the authority of an ordinary drought order (NEUB) or emergency drought order, we may consider that compensation would be payable (or credits made) to those affected. Customers may be able to claim compensation in the event of supplies being interrupted or cut of that are as a result of our mismanagement during a drought.

Any compensation payments would be in accordance with our Code of Practice for household and non-household c customers, and the Guaranteed Standards Scheme (GSS), available on our website, and periodically updated. Total payments will be capped at the average annual bill for the previous year. Our guarantees do not apply if we are prevented from meeting standards in exceptional circumstances or severe weather, including droughts.

The payments will be varied from time to time, in line with our guaranteed standards scheme.

8.3 Supporting other sectors

If alternative supplies are required by our customers during a drought situation, our priority is to look after our most vulnerable customers and priority sites (e.g. hospitals) in the first instance. We will then endeavour to support non-household customers wherever possible.

We are aware that many businesses, especially those with livestock and in rural communities, have alternative supplies or contingency plans in place for these situations, which we are supportive of. However, whilst we cannot offer any guarantee of being able to provide alternative supplies in an incident, we will work with Retailers to prioritise our available resources to support businesses where we can e.g. priority given to businesses which care for livestock or provide vital community support functions. Any of our business customers can contact us for advice during these situations.

We are also conscious that there are private water supplies within our region. If a drought adversely affects people with a private water supply, we encourage them to contact their Cambridge Water drought plan 2022 44 Local Authority in the first instance. The Local Authority responsible will consider whether the circumstances pose a danger to life or human health. In such a case we may be required to supply water by means other than in pipes, if practicable, for a period. We will also consider how we can help without putting our own customers' supplies at risk. The needs of vulnerable people shall be considered and would be agreed with the Local Authority, accounting for the water companies' capabilities at the time, and provided accordingly. It is expected that large domestic private water supplies (more than 10,000 litres a day) make their own arrangements for alternative supplies. In the event of widespread requests for support we would seek support and direction from the relevant industry regulators or government departments.

8.4 Fire and Rescue Service

We are required as part of the Fire and Rescues Services Act 2004, to provide reasonably required water for firefighting. Before Level 4 and Emergency Drought Orders, there are a small number of actions we take that could affect fire hydrants. The most obvious of these is if we lower pressure during a drought to reduce leakage. In these situations, it is important that we take every action to mitigate the impact on the fire service, and the below details our actions to deliver this:

- We will communicate with the fire service to keep them updated of our situations and any planned interventions. We have engagement meetings with the fire service as part of business as usual, and we will engage with these contacts through our drought management team.

- If appropriate, we advise them of alternative locations to take a supply from that have higher pressure/ flow. For example, we may suggest that they connect to a larger main or bypass fittings (PRV) that may be creating a reduction of pressure.
- If required, we will support on site by sending a Cambridge Water technician to the area to assist.

South Staffs Water

Cambridge Water

To help create a world where essential services and infrastructure deliver for customers, clients and our planet

south-staffs-water.co.uk | cambridge-water.co.uk