



10th Jan 2025

Dear Cambridge Water

Cam Valley Forum's response to Cambridge Water's pre-consultation for the 2027 Drought Plan.

As chair of the Water Conservation Working Group, that has been set up by Cam Valley Forum (CVF), I have been asked to respond to this consultation.

CVF shares the concerns of many stakeholders that Cambridge Water has not embraced the gravity of the situation and the harm that is being caused to the environment in our severely water stressed area, which is increasingly subject to extreme weather events. We hope that the new Drought Plan will address this, and take full account of the fact that we are now in a new era of climate change (with 2023 and 2024 now shown to be globally the hottest years on record)

Too much water continues to be abstracted from our Chalk aquifer, particularly during the summer season, when generally evapotranspiration greatly exceeds any replenishment that precipitation may bring. The Environment Agency (EA) has warned of the impending crisis, and yet their objections to major new developments, because there is inadequate water to service them, are being over-ruled by the Local Planning Authority. This is because of the over-riding pressure for growth that is being imposed by central government. In the light of this Cambridge Water will have an increasingly onerous task of continuing to provide essential water services while not harming our chalk streams.

In relation to the specific points that the Drought Plan will cover, we have the following comments.

- 1. A full review of the current plan to ensure that it meets the latest EA guidance on drought planning, legislation on drought, and aligns with the latest draft WEMP and meets the Government expectations for water company drought plans.**

We are pleased to see that you will be ensuring that the plan meets the latest EA guidance. We note that the EA is currently consulting on the guidelines that water companies in England must follow when preparing their new drought plans. We are pleased to see the following statement on the EA public consultation website:

We expect water companies' drought plans to show how they will do more to protect the environment. We received a number of responses to our 2019 consultation of the drought plan guideline asking for better protection for chalk streams. For this guideline update, we have included further information on the use of environmental triggers for environmentally sensitive sites and in particular providing the examples of chalk and greensand rivers.

We hope that Cambridge Water will take full note of this.

- 2. Further development of Environmental indicators and triggers to ensure that we can take appropriate measures earlier in a drought or emerging drought to protect the**

environment and work with stakeholders and customers to do so.

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

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

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

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

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

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

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

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

6. Undertake the appropriate level of environmental assessment of our drought options and the drought plan, including Strategic Environmental Assessment (SEA) where applicable.

We agree that this is essential.

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

We agree this is essential

8. Update our communications plan.

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

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

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

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

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

10. The EA would like to see the five regional water resources groups take a more prominent to reduce role in drought planning and management. WRE already organises regular Drought Group meetings to bring representatives together from across sectors to plan for and coordinate future drought events. We would be interested to hear your thoughts on how regional groups could play a greater role in drought management so that we can include a 'Statement of Intent' from the relevant regional group(s) in our 2027 Drought Plan. WRE is planning a webinar to discuss this in more detail in mid-January, with details to be publicised closer to the time.

We communicate regularly with WRE, and have been involved in many discussions with them so far. We plan to participate in the forthcoming webinar to discuss this and are hoping that an appropriate 'Statement of intent' can not only be developed, but also acted on subsequently.

11. Demonstrate how we will work with water retailers for non-household customers in our area of supply, and other New Appointment and Variation (NAV) organisations with their own domestic customers in our area of supply to develop clear and consistent drought communications

This is a vital area of work and has unfortunately been overlooked previously. Water retailers for non-household customers must be brought into the discussions and take part in finding and implementing drought measures including solutions for the reduction of water consumption. You should be working with them so that non-domestic water consumption can be significantly reduced

In conclusion, we urge that the Drought Plan refers to and acknowledges the particularly high rates of growth in Cambridge as a fundamental cause of over-abstraction from the chalk aquifer, particularly during the summer season and periods of low rainfall. We are fully aware of the mechanisms being proposed to address this (such as the water credits scheme) but, like many, we have little confidence in the effectiveness of many of the proposals. A good drought plan will be vital if we are to be prepared for the uncertainty of the future.

Kind Regards

Michael Goodhart- on behalf of Cam Valley Forum.