



Cam Valley Forum

Response to the consultation on the Cambridge Water draft Drought Plan 2026

30th July 2026

General comments

CVF is grateful that Cambridge Water took account of our January 2025 response to the pre-consultation on the Drought Plan and have included our comments in Annex B. The revision does indeed address some of our concerns and is definitely an improvement on the 2021 Drought Plan. We note that the revision broadly follows the EA guidelines to water companies on how to prepare their drought plans but, as noted below, we have some significant concerns.

In CVF's January 2025 response, we urged that the 2027 Drought Plan should refer to and acknowledge 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. With the approval of the Cambridge Development Company this month, the current rate of development and house building will increase and put further pressure on water supplies. The draft Drought Plan still only makes glancing reference to this.

The draft Plan also continues to rely on historical and relatively old data on the climate, whereas there is now global, national and local evidence that climate change is occurring both faster and at a more irregular pace than originally experienced. It does not adequately explain the influence that this has on water supply and demand. There is now ample evidence and strong calls at national level for the introduction of extra safeguards, both to prevent damage to the environment and particularly our unique chalk streams, as well as to ensure adequate and sustainable water for all needs in the company's area of supply.

We assume that in making the final revision you will mention that already in 2026, a hosepipe ban is in place and that, as of 29th July, the EA has declared drought status for the region. We think this is further evidence for some of the points we have made below.

A minor point, but we think that readers would have more confidence in the plan if this could be properly edited. In many places, if not throughout, the word 'complemented' has been spelt 'complimented'.

Detailed comments

1. Introduction

Section 1.1 This states that Cambridge Water will “*review the detail following any dry weather or peak demand event **out of the ordinary** and revise the plan where appropriate*”. Such is the nature of change now that we feel the **ordinary** is now often **extraordinary** - the phrase ‘out of the ordinary’ does not have much meaning now. The point needs to be made that some sections of the drought plan will need **frequent** review and potential revision within the next five years. We think mention of the current serious situation should be made in this very first section of the plan. The Cambridge population must be helped to understand that climate change and the extreme variability in rain and dry periods, combined with periods of extreme high temperature and altered farming methods (that have caused soil compaction and lower soil carbon), all affect aquifer recharge. Until alternative supplies are forthcoming, successful winter aquifer recharge is critical to the prevention of drought.

Section 1.2. About the Cambridge Water supply area. This section only briefly refers to the proposed development and increased population within the supply area, the problems with the sources of supply, and the long time-scale involved in bringing new sources of supply (e.g. the projected Chatteris reservoir) into operation. Further explanation is needed and, at minimum, a phrase along the lines of “, *a population likely to increase dramatically in the next decades*” should be added to the sentence “*In the Cambridge region we supply wholesome potable water to a population of 370,000 in South Cambridgeshire and part of Huntingdonshire.*”

We recognise that supply is covered in more detail in the WRMP, but since the Drought Plan is likely to be read separately, we feel that it should give a better idea of the supply challenges, as this will result in improved understanding of why the actions proposed in the Plan are so important. Although it is not the purpose of the Drought Plan to cover the supply-side in detail, the draft does not indicate how perilously unsustainable the present system is.

An assessment for CVF by Dr Robert Evans (an ARU soil scientist) showed that, in 40% of years, Chalk aquifer recharge is inadequate by the Spring of each year¹. This was well illustrated by the autumn of 2025 when SMD was huge; although subsequently there was heavy rain, the recharge by March was still not enough to prevent a TUB being declared in July 2026. We question whether the SPE and SPEI have been correctly calculated?

Section 1.3 Links to other plans and the WRMP. This section states that “*We are committed to addressing these longer-term planning issues through our WRMP, which includes significant supply and demand measures to meet these needs.*” We are not convinced that the measures outlined in the WRMP will in fact address future needs (as expressed in our earlier response to the WRMP). The government itself expressed considerable concern that the WRMP was not adequate for the future, and requested changes, which were made but with considerable reservations on your part, as expressed in the letter from Cambridge Water to the EA/OFWAT/Defra in October 2025. The company is clearly aware of the tension between the governments push for growth and the environmental limits in this region and we feel that CWC customers would feel more sympathetic and willing to accept that changes must be made to their use of water, if this were to be made clear in the Plan.

¹ https://camvalleyforum.uk/wp-content/uploads/2020/05/Cam_Valley_Forum_Let_it_Flow_Full_report_26-05-20-compressed.pdf

Section 1.4 Environmental Responsibilities. We think that the current significant problems are inadequately addressed in this section and need much more emphasis and recognition of their scale. The current and projected increase in local population will have a major impact on the domestic and non-domestic demand-side, both of which CWC is obliged to meet. The water crisis is now recognised as being Europe wide, and droughts are clearly increasing as a result of both climate change and changes in land use and management.

We fully recognise the importance of ground water level recording, but have concerns that CWC is not, seemingly, monitoring upper chalk stream levels and thus noticing when these are critically low. The chalk streams have their best flow (and water quality condition) closest to their spring sources. Lower downstream the flows of many are augmented to some degree by Sewage Treatment Works (STWs) outfalls (and thus also polluted or at minimum have altered water quality). Lower Cam tributary stream flows are thus not good indicators of Chalk stream flows per se. For example, in a drought, the River Granta flow is primarily from STWs alone; that flow and any added augmentation may actually flow back into the aquifer itself (as in 2019 when the River Granta dried up totally at Stapleford). This is really disastrous for the environment.

Given that both land use/management and climate related problems are greater now than in previous periods, an explicit adoption of the precautionary principle is needed. **We recognise that CWC is beginning to reduce abstraction**, but a reduction of 7 megalitres a day over a period of ten years is barely a start set against what is needed. Although we recognise that the drought plan is not the vehicle for addressing this, we would like to feel there was more commitment from CWC to comply with the EA's recommended abstraction reduction target. CVF hold to the "Chalk Streams First" approach which has had wide acclaim across Chalk stream areas in England².

This is emphasised by CVF's experience from monitoring flow and water quality in the River Granta as part of our citizen science programme (data from which is provided to the Greater Cambridge Chalk Stream Project). In the late 1980s and early 1990s the augmentation scheme for the Cam Catchment chalk streams was initiated to compensate for the impacts of over-abstraction. Above Linton, in summer, the EA pumps water into the upper Granta from the Chalk aquifer. Such augmentation has been a life-line for over 20 sites in the Cam Catchment since then. The main trigger to starting and stopping the pumping is a flow of less than 26 litres/sec at Babraham. Since 10 July 2026, the gauging station data at Babraham has shown a flow of less than 26 l/s. Evidence from flow measurements upstream of this point, show that augmentation was already at a lower level than expected and that the flow at Babraham was in large part due to a further 17 l/s coming from the Linton STW effluent. By the time of the TUB implementation this year, indicating Level 2 had been reached, the natural Granta flow from the catchment was already very low, with over half the volume contributed by treated sewage. In 2019, the Granta in fact stopped flowing, with the augmentation and sewage effluent disappearing through the stream bed. Since the catchment supplies Cambridge Water with 10 megalitres per day (a flow equivalent to well over a 100 l/s), we feel strongly that a larger proportion could be made available for the river and its tributaries.

² https://camvalleyforum.uk/wp-content/uploads/2020/05/Cam_Valley_Forum_Let_it_Flow_Full_report_26-05-20-compressed.pdf

Section 1.7. Types of Drought. We are aware that the EA guidance requires you to define the 3 types of drought, but this description needs to be put into context of the droughts experienced in the Cambridge area – which type are these? Are there different expected responses to the different types of droughts? This section also emphasises historical data, rather than looking at future scenarios. As written, it is not clear how this section contributes to the plan.

Section 1.8. Lessons learned from 2025. The wording in this section needs revision, to explain what is currently happening in 2026 and how these events might alter previous lessons learned. For example, p.9 gives an assurance that due to the wet winter of 2025/26, no special measures will be required during 2026. However, as we now know this was not an accurate prediction, with the EAN PDW External Briefing on 22 June 2026 stating that only 37% of the long term average rainfall has fallen over the last 3 months, and that, if the hot weather continues, as it has, the EA *'cannot rule out the need for more formal abstraction measures'*. This section again emphasises that CWC is not looking at the predictions for future rainfall and heatwave periods, and is not considering the extent to which these might mean current expectations are wrong.

2. Drought Triggers

This section is key to the drought plan but setting appropriate drought triggers is a complex technical issue. The main plan does not explain these sufficiently clearly for a non-expert to understand. Appendix C2, the non-technical description of the drought triggers is not available, although C1, the technical description is available. We do not feel able to comment in detail beyond emphasising our serious concern that the triggers are still not appropriate for preventing serious water shortages in the future, and in particular that they do not adequately address the need for ensuring protection of the area's chalk streams. There seems to be much emphasis on using historical data for setting the triggers (e.g. in section 2.8. environmental triggers, the main reference is to historical data sets). We would like to see much more reference to predictive modelling and consideration of the known impacts of climate change.

We have noted that the new plan is taking a more tiered approach to drought triggers, and welcome this change. However, we particularly struggle to meaningfully understand, in Table 1 (section 2.1), the Levels of Service. The proposal that the drought action 'enhanced communications', as defined for Level 1, might be necessary only once in 5 years seems very inappropriate based on climate and water predictions. We think that increased communications about water consumption should be made as a matter of course at the end of winter every year, with the advice adjusted according to recent rainfall, aquifer recharge and predictions for the summer weather. Similarly, the suggestion that a TUB (Level 2) might be needed only every 10 years seems very out of step with the current efforts nationally and by local authorities to reduce per capita usage of water. The proposal within the draft Greater Cambridge Local Plan is for per capita usage to be set at 80 litres per person/day, which will require a significant reduction, and could be helped through the more regular imposition of TUBs. We are also concerned that there is an expectation that restrictions on non-household customers should not be required more often than one in 50 years. We firmly consider that restrictions on non-household customers should be more stringent and carefully designed. There is too little public understanding that unlimited availability of water is not an entitlement to either residents or the commercial sector.

The later sections (2.4 to 2.8) are very welcome, but clearly very technical. In 2.6 you explain how the SPI and SPEI measures are used to inform changes in potential evaporation. Are these measures ‘standardised’ in a fixed invariable sense or are they reflecting greater climate change events in their metric? We would like CWC to explain this (it is unclear if these figures are provided by some other source such as the Met Office). Relating to Section 2.8, where river flows are measured, CVF is very aware of the great influence that Anglia Water’s STW river outflows have on total river flows, particularly in drought years. Upriver stream flows are more important to monitor as has been amply demonstrated by the Wilbraham River group.

3. Drought actions

This section is extremely difficult to follow in the main draft plan, and the non-technical summary section on drought actions is so short that it is largely meaningless. The focus of the latter on hose pipe bans and what individuals can do seems out of place.

Our main concern in this section is that the actions proposed for each level should be taken at an earlier stage of prolonged dry weather. We feel that in the current situation, and applying the precautionary approach, actions for all Levels should be applied much sooner. Those at and before Level 1 are particularly important to bring in early in order to increase public understanding of all the issues involved in preventing, addressing and monitoring drought conditions.

We are also concerned that no real attention is given to leakage reduction until Level 1. This should be considered a high priority irrespective of the Drought plan: suggesting that somehow leakage reduction is only really needed to prevent drought is the wrong approach. CWC’s own data on leakage show that investment in leak prevention — particularly ahead of and during drought — is one of the most achievable actions to reduce demand. At Level 1, the action is to review ‘leakage position’ and increase ‘leakage efforts’ which is predicted to lead to a reduction in overall demand of 0.5-2.0Ml/d. If this is feasible in a drought period, surely it be undertaken anyway? There needs to be a much clearer explanation of why leakage reduction is part of the Drought Plan and not considered a key activity before drought conditions arrive. If there is still need to include it as a drought action, the actions proposed and timing need clearer explanation and justification.

Overall, we feel that, if there were more rational expectations about Levels 1 and 2, in terms of assuming that the actions required at these levels would be needed more often than the proposed 5 and 10 years, then the expectations that Level 3 actions would not be needed more than once in 50 years, and Level 4 more than once in 200 years might then make sense and be achievable.

5. Customer communications

We recognise that much of the solution must require a greater involvement of CWC customers in achieving the demand-side water saving goals. We would like to see the urgency for this ramped up, and recognition that customer communications are not just something that needs to be thought about during a drought. It should be an on-going activity regardless of levels of rainfall, hot weather, and droughts.

One small but urgent requirement is for CWC to provide very clear information on the front page of their website about how customers can provide their email addresses to the company, in order to receive information. It seems that only a small proportion of customers within CWC's supply area actually receive email notifications (a CVF committee member has been asked by a City Councillor how to do this, which shows the lack of communication on this particular issue).

6. Environmental assessment

This section of the Drought Plan is very difficult to understand with many technical terms. However, it is very important that this section can be made comprehensible for the river and chalk stream conservation groups in CWC's area. A clearer explanation is essential, as many of the water bodies referred to (River Granta, Millbridge Common Brook, Cherry Hinton Brook, Hobsons Brook, Little Ouse, River Thet and Sapiston River, Bottisham Lode-Quy Water, Swaffham-Bulbeck Lode) are in the Cam catchment and are subject to extensive monitoring, research and restoration work through local initiatives³, through CVF, the Cam Catchment Partnership and the many associated smaller friends' groups. These groups would be interested in participating in monitoring during droughts, but need to understand the CWC approach and methodology.

³ We note the Millbridge Common Brook was once a source area of Cambridge Water supply that you have not used since 2012.