

Cambridge Water draft Drought Plan Consultation, 2 Aug 2021 Response of Cambridge Green Party

The Cambridge Green Party welcomes the fact that Cambridge Water has made their draft drought plan available for consultation. We understand that Cambridge Water must abide by the policy and regulatory framework in which it operates, and that the plan is designed in particular to (a) manage the water available to supply customers and meet their demand; (b) set out how it will minimise the impact of its activities on the environment; (c) communicate with customers, regulators and other key stakeholders in relation to planning for droughts; and (d) identify triggers for the actions to be taken if a drought seems likely.

Given these objectives, we consider that the Draft Drought Plan fails to recognise the very serious situation that the region finds itself in as a result of excessive water abstraction caused by the dramatic urban development in and around Cambridge. The situation is made worse by the growing and very obvious impacts of climate change on residents, businesses, agriculture and biodiversity. The draft plan barely acknowledges either the rapid growth of the city, or that fact that the anticipated increased frequency of drought periods and more erratic rainfall will negatively impact the ways that water is obtained and distributed. New development is adding particular pressures in Cambridge Water's supply zone and **the final plan must therefore reflect the formal designation this year (1st July 20210) of the company's supply zone as an 'area of serious water stress'**.

There is a brief statement in the introduction noting that Cambridge Water operates "*in one of the driest and fastest growing regions in the UK, and significant future housing growth is planned in the coming years*". This is the **only** reference to the current over-development and water abstraction crisis. We are equally concerned about the use of the word 'may' in the statement '*We also acknowledge that not all existing abstractions are sustainable over the long term and may already impact river flows*' and '*we are investigating any abstractions that may impact the environment through the Water Industry National Environment Programme*'. This suggests a reluctance to acknowledge, and even institutional blindness to, the current emergency situation. The introduction indicates that the company is waiting for "long-term planning" to come to fruition, a completely inadequate response, given the many actions that can be taken now. As suggested by the Cam Valley Forum, Cambridge has the expertise and capacity to become the "No.1" water-saving city in England, and Cambridge Water could help to provide the necessary leadership. We are thus very disappointed by the draft.

Lack of emphasis on environmental issues

We do not think that the draft plan describes the current water context and the close interaction of the city's water supplies with the environment sufficiently accurately. There is no explanation of how current abstraction rates are damaging the environment, particularly our Chalk streams which are now seriously at risk – we are astonished that there is no mention of these streams. The long-standing impacts of over-abstraction on Chalk streams in the Cam catchment are proven and increasingly recognised by public bodies, both regionally and nationally (see documentation available through the Cam Valley Forum and Friends of the River Cam). For example, the Government's draft Strategic Priorities for Ofwat include: '*We expect companies to support environmental protection and enhancement of priority habitats such as chalk streams*'. Affinity Water's recent Draft Drought Management Plan specifically references its environmental responsibilities and makes 81 references to 'Chalk', reflecting its commitment to restoring Chalk streams in the Chilterns; Cambridge Water's draft makes a single reference to "Chalk". We would like to see Cambridge Water make a similar commitment to fulfilling its global responsibility to care

for and restore the Chalk streams affected by its activities, in all its policies, plans and relevant actions, including its Drought Management Plan.

Respective roles of Cambridge Water, the public and other stakeholders

The plan puts too much onus on the public to reduce water use: agriculture and industry are also major users. While we need to be sure that food is produced there are huge changes that all these industries can make to reduce water use: farms can make their own reservoirs and use the regenerative farming approach; industries can change how they use water and design less wasteful methods. We recognise that it will take collaboration between many organisations, regulators and the private sector to address all the issues involved, but the Drought Plan needs to set this out clearly, in order to identify exactly where Cambridge Water itself has the potential to show leadership.

Improved communication and awareness-raising

Lessons can be learnt from mechanisms (such as road shows, mobile information stalls, identifying community “champions”) currently being used to improve up-take of COVID19 vaccinations which are having a demonstrated impact. Cambridge Water needs to work more closely with voluntary groups and the media to communicate the importance of water and water-saving messages to households and businesses including recycling, re-use (grey water) and collection of rain water. The website quoted in the draft plan (<https://www.savewatersavemoney.co.uk/>) gives a very limited range of options, does not cover all water-saving options available (e.g. SUDS, wetland systems etc) and the draft plan fails to provide local examples of good practices that in many cases are ahead of government requirements: as an example, many allotments have, of their own accord, installed rain water collection mechanisms (e.g. Foster Road Allotments Trumpington Cambridge have just installed a 6,000 litre rain water collection butt). Cambridge Water could provide more help and advice to such groups – allotments in particular are contributing increasingly to food security in the city as more and more people start to grow their own vegetables, often sharing their crops with those unable to do so.

Key changes needed

We are sorry that the points made by Cam Valley Forum and others in their pre-consultation response, were not fully addressed in the draft. We believe the following are essential components that should be covered in more detail in the final Drought Plan, with the overall ambition of reduction of abstraction from the Chalk aquifer in the Cam catchment *at source*, so that **springs and headwaters run freely throughout the year, every year, whatever the weather:**

- Defining a **minimum baseline of mandatory restrictions** on household and business use of water **to be applied at all times**, with further restrictions to be imposed as a matter of course from May to August at minimum every year (e.g. a ban on household use of sprinklers and hosepipes, including high-pressure hoses used to clean driveways and patios). TUBs are a key component of drought plans, and Cambridge Water lags behind other companies in implementing these. As pointed out by the Cam Valley Forum, Cambridge Water is still working to standards for the use of Temporary Use Bans (TUBs) and Non-Essential Use Bans that would be more appropriate for Scotland.
- **Cambridge Water’s drought trigger levels should reflect environmental impacts**, not simply the availability of licensed quantities. There appears to have been no significant change to the mechanism for determining triggers for action, and it is highly likely that if action is taken using the mechanism in the draft plan, it will come too late. The Environment Agency’s approach to

drought management should be fully integrated into the company's plans. Although the draft plan includes several environmental indicators, these do not appear to make any material difference to the timing of the introduction of restrictions on water use which appears still to be based solely on the availability of water supplies.

- **Immediate reduction of water wastage** through investment in leakage control, compulsory metering, and demand management in all its forms, as mentioned above.
- Reconfiguration of the company's water supply systems by **applying a 'Chalk-streams first' solution**, as Affinity Water plans for its Central supply area, supported by water transfers. We would also like to see capping of Chalk aquifer abstraction at current levels, regardless of licence entitlements; immediate increases in public demand can be met via surface water transfers from Anglian Water.