Appendix A

Drought Plan Consultation

1. Introduction

Cambridge Water is committed to engaging with all the stakeholders who have an interest in this plan. The Company has undertaken consultation with these stakeholders and the public in preparing our drought plan, as explained in this document.

2.1 Pre consultation

In accordance with the EA drought plan guidance we have consulted with statutory consultees prior to producing our draft plan to identify any issues of importance and for any comments that we should consider in our plan. Our pre-consultation ran from December 2025 until the 10th of January 2026. We asked for comments from the following stakeholders for consideration in the revised plan;

- Canal & River Trust
- Environment Agency
- Natural England
- Historic England
- DEFRA
- Ofwat
- The Environment Agency
- Severn Trent

Under the EA guidance companies are also required to consult with any licensed water supplier which supplies water to premises in the undertaker's area via the undertaker's supply system. These are 'inset' appointments, and there are currently two such licensed water suppliers operating in the South Staffs Water area of supply, one of which is Severn Trent.

The comments received during the pre-consultation are summarised in table 1 below;

Table 1. Summary of Pre Consultation Comments

Consultee	Nature of response received	Relevant section of Plan
Defra	No Comment	N/A
Environment Agency	1. Specific areas to address in your Drought Plan There are a number of significant issues that you should resolve when preparing your draft Drought Plan. Review of drought triggers When reviewing your drought triggers and control curves for your Drought Plan, you should ensure the spacing of the drought triggers leave sufficient time to undertake the relevant actions. The control curves in your current plan are compressed with numerous actions triggered at each drought level. We are not certain if this would give you sufficient time to complete all of the steps required for each action. Your drought triggers should allow enough time to both prepare for and carry out the actions associated with each trigger. Triggers can also be used for decision making points and should include the initial consideration and preparation for an action through to the implementation and removal of an action. You should ensure your draft drought plan outlines how you have considered these requirements when developing your drought triggers and control curves. You should also consider the time taken to realise the benefit from your actions in developing your triggers. Please see section 3.2 of the Drought Plan guidance guideline for further information on drought triggers. Your current drought triggers focus on Blithfield Reservoir. Your drought triggers should also represent your other abstractions, including the River Severn and individual groundwater sources. An example of a trigger for the River Severn could link to the number of days of regulation, with a metric tracking your actual abstraction vs your 100 day pro rata limit. You should also review the scenario testing carried out to demonstrate how your Blithfield Reservoir triggers work alongside the Environment Agency's Clywedog Reservoir triggers in practice to ensure drought resilience. You should continue to work closely with the Environment Agency as you develop your drought triggers. Inclusion of Environmental Triggers The environment may show signs of drought stress before your water supply sources are affected. You should consider incorporating environmental triggers in your Drought Plan to avoid local impacts to surface water or groundwater features and dependant species. Please see section 3.2 Decide on your drought triggers (environmental triggers) of the drought plan guideline for further information on expectations around	

	environmental triggers. You should continue to work closely with the Environment Agency as you develop your environmental triggers. Extreme drought sources Your current Drought Plan discusses bringing Hulme Spring, Shenstone & Sandhills Groundwater Sources back into use during an extreme drought. The Environment Agency position is that such sources should not have an abstraction licence for public water supply but should be operated under a drought permit. Therefore, you should confirm revocation of extant licences in your draft Drought Plan and you should develop an environmental assessment report (EAR) and supporting drought permit information for each source. Please see section 4.4 of the drought plan guideline for further information on extreme drought actions. You should share your planned approach with the Environment Agency ahead of your draft plan submission, to help us fully understand and review the EAR and supporting information produced for each source. As set out in section 4.3 of the Drought Plan guidance, you should include a trigger/s for each of your supply actions, the drought level that you will plan and prepare for the action and the drought level at which you will implement the action if they are different, as well as an implementation timetable. Your current drought plan references that there is a long lead in time to make these sources available. Therefore, including this information would help ensure these sources are available when needed. Further, the terminology of emergency source, used in your current Drought Plan, may cause confusion with level 4 actions and emergency plan. You should review these issues and continue to develop extreme drought actions. Please refer to the drought plan guideline in relation to these issues. Incorporating lessons learned from the 2022 drought As part of your draft WRMP24, you developed Appendix R 'South Staffs Water 2022 Drought Review'. You should ensure the learning from the 2022 drought detailed in this appendix is fully incorporated into your updated Drought Plan. Your pre-consultation letter states you will carry out scenario modelling of drought events including the 2022 drought event. When carrying out this scenario modelling, you should: • Consider the River Severn Drought Order and its impacts on abstraction at Hampton Loade. We are happy to discuss the representation of the River Severn and Hampton Loade with you. Any outputs of the modelling work that show major differences to previous work will need to be investigated and changes to the water resource model may need to be made. • Incorporate any changes to operation from the River Severn as a result of WRMP24 options of your own or other companies that might impact over the lifetime of the plan. • Use this modelled scenario alongside other droughts scenarios. As stated in section 3.3 of the Drought Plan	

	guidance, you must provide worked examples in an appendix to your drought plan to show how you have tested your chosen triggers and that they are appropriate to a range of droughts. • Incorporate the impact of water quality on abstraction as during the 2022 drought, ammonia spikes caused poor water quality in the River Severn, resulting in varied abstraction at Hampton Loade. This put additional pressure on Blithfield Reservoir. You should consider including the impacts of water quality on abstraction as a worked example. See section 3.3 of the Drought Plan guidance for more information on worked examples. You should consider how water quality will be monitored and how you plan to manage the impacts during a drought. Development of Environment Assessments Your pre-consultation letter states that you will undertake the appropriate level of environmental assessment, including Strategic Environmental Assessments (SEA) where applicable. As stated in section 6 of the guidance, early consultation with regulators is particularly important for SEA. Therefore, you should determine early in the planning process whether you will be undertaking a SEA and inform regulators. You should complete an environmental assessment for all the supply actions in your draft drought plan. You should identify the impacts of your drought actions on all water bodies affected and for all relevant classification elements. Particularly if deterioration is likely to occur. You should ensure your actions do not risk WFD deterioration. This is important as many of your potential sources fall within 'poor at risk' groundwater bodies with associated groundwater balance, dependent surface water and groundwater dependent terrestrial ecosystem test failures. When preparing your draft drought plan, you should consider how your drought management actions will support the environmental objectives set out in the River Basin Management plans. Please refer section 6.6 of the 'Environmental assessment for water company drought planning' supplementary guidance for further information. Your current plan refers to several environmental monitoring plans to assess the impact of implementing supply-side actions on existing licence headroom. You should review these plans to ensure the monitoring included for each catchment is sufficient to determine environmental impact (including WFD compliance). This should include detail on the location and frequency of monitoring work. These plans should also refer to recent WINEP investigations and any updated conceptual understanding when determining appropriate monitoring. Sections 6 of the guideline states your environmental assessments should include any mitigation measures you plan to implement. Mitigation measures presented in the current plan focus on surface water, flows and wetlands. Increased flow augmentation (sources from groundwater) is no longer considered appropriate as this would further result in additional groundwater body balance issues (where the groundwater body is already at poor). You should no longer include	

	increased flow augmentation as mitigation measures. Furthermore, in section 1.1.1.3 of Appendix F of your current Drought Plan it states, 'Where we identified a significant moderate (or higher) impact, we consider appropriate mitigation measures'. You should clearly set out the significant impacts identified and what the planned mitigation measures are. In appendix F of your current Drought Plan, section 1.2 and 1.3 states that designated sites have been assessed as part of this plan. However, the information provided is limited. You should include a table of all the sites assessed as part of this work which have been identified near to or downstream of your abstractions and any anticipated impacts. Appendix F also details how you have reviewed the impact of ecological receptors in your Environment Assessments. A more detailed review of ecological receptors has been provided for the River Blithe and River Trent pump back than the River Severn at the River Severn Works. There are also multiple species which have not been adequately assessed, such as water voles and white clawed crayfish. You should ensure the screening of impacts to ecological receptors is applied to every abstraction point to understand if species downstream will be impacted and that all relevant species have been adequately assessed. Your current plan lists the River Blithe pump back and River Trent as a potential site for a drought permit application. It is predicted that the transfer scheme could potentially transport zebra mussel from the River Trent to the lowest reach of the River Blithe. You should confirm in your draft drought plan how you will limit the spread of zebra mussels. As stated in section 6.5 of the Environmental assessment for water company drought planning supplementary guidance: • You must review whether the supply side options in your drought plan will risk spreading Invasive non-native species. • You must investigate mitigation and risk reduction measures that you can apply. • You should also consider options that can be taken before drought to reduce the risk of spread of existing species and the introduction and spread of species. You should refer to section 6.5 of the ‘Environmental assessment for water company drought planning’ supplementary guidance and work with the Environment Agency as you produce your draft drought plan. Section 3.2 of the updated ‘Environmental assessment for water company Drought Planning’ supplementary guidance states you may consider using hydroecological modelling approaches to help understand the relationship between flows/levels, habitat, water quality and ecology and assess environmental sensitivity where limited long-term data is available. The supplementary guidance suggests the Hydroecology toolkit as an option for this work. If you are considering using modelling, this should be discussed with the Environment Agency and any queries regarding the Hydroecology toolkit should be directed to the Environment Agency Hydroecology Team at hydroecologyteam@environment-agency.gov.uk .	

	River Severn drought order In your current drought plan, you state that in the event the Environment Agency is granted and implements a River Severn drought order, you would need to apply for a drought order. If granted, this would reverse the 5% reduction on abstraction and other temporary changes resulting from the River Severn drought order. You committed to not using this as a drought option until the relevant environmental work for Appropriate Assessment and in-combination impacts were completed. This was an action for you to complete the Habitat Regulations Assessment (HRA) when your final drought plan was published in 2022. We expect you to work at pace with the regulators (Natural England, Natural Resources Wales and ourselves) to complete all necessary work on your drought order before you publish your draft plan for consultation later this year. Use of Brindley Bank source Section 3.3.3 of your current Drought Plan discusses transferring raw water from Brindley Bank borehole into Blithfield Reservoir during droughts to assist with refill. This licence is currently under review. You should discuss how you plan to include this source in the drought plan with the Environment Agency before publishing your draft plan. Status of Barr Beacon 1 and 2 service reservoirs You should ensure that the status of Barr Beacon 1 and 2 and the impact on your resilience are considered within your draft Drought Plan and set out how you will factor this into your drought response. Alternative options to replace transfer of potable water into Blithfield Reservoir Since you published your 2022 Drought Plan you have carried out further investigations into the supply option to transfer potable water into Blithfield Reservoir. Through this work, you have recommended that this option not be taken forward as an option in future plans. You should investigate the need for alternative options that could be included in your draft Drought Plan. We encourage early dialogue with us if you are considering including any new / different options within your new draft plan. Demand Management As set out in section 4 of the Drought Plan guideline, you should implement demand reduction measures before application for drought permits/orders and before the implementation of extreme drought actions. These should be clearly set out in the demand actions of your Drought Plan and should include leakage management and pro-active customer	

	communications. You should review and update your demand management actions considering any lessons learned during recent dry weather. You should review the implementation timetable for Temporary Use Bans (TUBs) presented in your current drought plan. Carrying out preparatory work during non drought periods should allow this timetable to be shortened to ensure TUBs are implemented at pace when required. Building in flexibility to the length of your representation period to take into account different types of drought and your specific situation may also allow the current timetable to be shortened. You should refer to the UKWIR UK Water Industry Research (UKWIR) report 'Managing through drought: code of practice and guidance on water use restrictions - 2023' as well as section 4.2.1 of the Drought Plan guidance when reviewing your implementation timetable. You should review the wording used to describe TUBs to 'normalise' their implementation. Currently section 2.3 of your Drought Plan states you will only implement TUBs in 'genuinely exceptional circumstances', creating negative connotations. As stated in sections 4.2.1 of the Drought Plan guideline, water companies are not financially penalised by Ofwat if they implement temporary use restrictions (such as temporary use bans) during a drought. You should ensure this is clearly set out in your draft Drought Plan as well as any performance commitments you have chosen related to your use of temporary use restrictions. As set out in section 4.2.2 of the Drought Plan guideline, you should consider what further actions you can take to reduce residential water use at any time of year, including implementing temporary use restrictions, as drought can occur across more than one season/year and can be quick or slow onset. You should also look at what further innovative demand actions you can implement to help your residential customers to significantly reduce their domestic water use when other actions, such as temporary use restrictions, are not achieving the desired reduction. Section 4.2.2 of the Drought Plan guideline sets out that when including further demand actions in your plan, you should: • identify from what drought level you would implement the further demand actions • consider if there is any impact on your drought levels of service • ensure you could implement actions at any time of the year • consider how these actions could be both fast tracked and scaled up as a drought worsens • identify ways to monitor any changes in residential demand that result from these further demand actions in order to understand their effectiveness across all residential groups and explain how you will share this with your customers Working with NAV companies during a drought The number of NAV companies and the proportion of the population they serve is increasing. You should ensure you have a good understanding of which NAVs are operating in the South Staffs area and how you will engage with each	

	company. As the NAV market in continually changing, you should ensure you are aware when new NAV companies begin operating in the South Staffs area and update your communication plan to include these companies. As stated by the guideline in section 2.1, you should consider holding pre consultation discussions with NAVs. Holding these discussions early in the process will help ensure alignment of drought actions, including joint communications (section 2.2). 2. Additional considerations You should follow the water company Drought Plan guideline when preparing your draft Drought Plan. This will be available, along with the supporting guidance on the Environment Agency's external SharePoint site: https://defra.sharepoint.com/:f:/r/sites/Community1339/Guidance/Drought%20pl an%20guidance?csf=1&web=1&e=sJD3Rz Please contact our mailbox if you need access to this site or would like to request copies of the guidance: Water-Company-Plan@environment-agency.gov.uk. You should also consider all relevant statutory requirements including the latest Drought Plan (England) Direction and the government's letter to you on its expectations for Drought Planning when issued. You should consider any lessons learned from any recent experience of dry weather, along with any relevant lessons from other companies. We encourage you to consult with a range of statutory and non-statutory stakeholders at this Drought Plan pre-consultation stage, including your customers, neighbouring water companies, NAVs, water retailers, environmental NGOs, Wildlife Trusts, local community and catchment groups. We recommend engaging with Natural England regarding your environmental assessment report, monitoring plan and SEA. Please ensure you prepare the environmental assessment reports you need for your Drought Plan early enough to allow adequate time for you to consult with regulators and for their review. You should include a programme of work in the draft plan you consult on for any outstanding environmental work you need to complete to be application ready for any of your more frequently or more likely permits or orders. Please refer to section 4.3.1 of the water company Drought Plan guideline for more details on application ready requirements. We would also encourage you to further develop your understanding of possible water quality and drinking water quality issues and risks your system may experience during times of drought and outline what actions you would take to mitigate these in your Drought Plan. 3. Pre-consultation letter questions Our response to the specific question you raise in your pre-consultation letter is included below. You requested views on: The role of regional planning in drought management Since your last Drought Plan, regional water resources groups have played an increasingly important role in water company water resources planning. We expect you to work with your neighbouring water companies and the regional groups that	

	you are a member of to identify opportunities to collaborate and align your Drought Plans where possible. We expect your Drought Plan to align with the regional group's 'statement of intent', which will set out the role that the regional group will take in drought. Further details on our expectations regarding the statement of intent will be included in our Water Resources National Framework 2.0. Your Drought Plan should include details on how you will share water with your neighbouring water companies, how you will operate sources to benefit other water users whilst minimising risk to your supplies, and any joint communication or actions you plan to undertake during a drought. You may wish to consider and develop triggers based on the situation of neighbouring water companies, members of your regional groups or other sectors that are under drought stress.	
Natural England	Habitats Regulations Assessment A water company is a competent authority under Regulation 7(1) of the Conservation of Habitats and Species Regulations 2017 as amended (referred to as the Habitats Regulations). Under Regulation 9(3) a competent authority, in exercising any of its functions, must have regard to the requirements of the Habitats Directive so far as they may be affected by the exercise of those functions. Cambridge Water must ensure that its drought plan meets the requirements of the Habitats Regulations and, if necessary, must undertake a Habitats Regulations Assessment (HRA) on the effects of the drought plan (including any supply-side drought management options) on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, alone or in combination with other plans. The HRA should be a clearly distinguishable document or section of the plan. Strategic Environmental Assessment (SEA) Please note that where specific drought management actions (including drought permits an orders) in a drought plan are assessed as likely to have a significant effect on a Habitats Directive site, the plan will require an SEA under Article 3.2(b) of the SEA Directive. If an assessment is required, Natural England would like to see the in combination and cumulative assessment linked both to the water company WRMP proposals and to drought plans of other companies where they could affect the same environmental receptor. Sites of Special Scientific Interest (SSSIs) and biodiversity Section 28G of the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) places a duty on public authorities, including water companies, to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of	

	SSSIs. These duties are mirrored in the general recreational and environmental duties placed on relevant undertakers in the Water Industry Act (1991) as amended. Natural Environment and Rural Communities (NERC) Act and the Environment Act 2021 In addition, under Section 40 of the Natural Environment and Rural Communities Act 2006, every public authority, including water companies, must in exercising its functions have regard so far as is consistent with the proper exercise of those functions to the purpose of conserving biodiversity. Conserving biodiversity in this context includes restoring or enhancing a population or habitat. The Environment Act 2021 amends and strengthens this duty, requiring public authorities, including water companies, to "further, so far as is consistent with the proper exercise of their functions, the conservation and enhancement of biodiversity", reflecting the aim of restoring or enhancing a species population or habitat. Government guidance (Complying with the biodiversity duty - GOV.UK) sets out information for public authorities to understand what the biodiversity duty is and how to meet it when carrying out all activities. Prioritisation of drought actions Any proposed drought action affecting a designated site should be properly justified. Such actions should only be proposed where there is a considerable risk to water supply from significant and infrequent drought events and should not represent routine responses to relatively frequent water shortages. Reasonable steps to reduce water demand should be taken before drought actions are carried out. Actions with a high environmental risk (as identified through the HRA, SEA and Environmental Assessment Reports) should be selected only as a last resort. The level of risk will be determined by the: • sensitivity of the site(s) affected • extent of the impact • availability of mitigation options. We would be pleased to support Cambridge Water in the development of its Drought Management Plan and the associated environmental assessments through Natural England's Discretionary Advice Service (DAS). Further information on this chargeable service can be found here: Developers: get environmental advice on your planning proposals - GOV.UK	
Ofwat	No Comment	

Severn Trent	No Comment	
Canal & River Trust	The Trust is keen that any impacts on navigation across our 2000 mile network of canals and navigable rivers, including on our water resources such as reservoirs, licensed and exempt abstractions from surface or groundwater sources, that may arise through the implementation of Drought Plan options, are carefully considered and assessed in the development of options. The Trust will be happy to engage with you on discussing details and possible impacts, so that any draft Drought Permits or other drought measures can ideally be supported by the Trust, through the development of the Drought Plan and thereby avoid any challenge if the Drought Permits or options need to be implemented in the future. The Trust is also keen to explore, via the development of Drought Plan options, any opportunities to utilise our inland waterway network for potential water transfers (drought or otherwise) as well as more conjunctive schemes/options (e.g. utilising any available Trust sources such as reservoirs, where appropriate) to build longer term resilience to public water supplies. This is already taking place via the RAPID SRO process in some locations, and there is the wider Regional Water Resources Planning process underway, but specific Drought Plan options may require detailed consideration which we are happy to support.	
Historic Engalnd	General comments in relation to planning for drought and the historic environment: The draft Drought Plan is of particular interest to Historic England for the following reasons: 1. The vulnerability of some heritage assets (designated and non-designated as set out in the National Planning Policy Framework) to drought, and the potential harm to, or loss of, significance as a result of changes to water catchment areas; 2. The potential impact of water catchment and abstraction measures on heritage assets and their settings, including impacts on water-related or water dependent heritage assets; 3. The potential impact of changes in groundwater flows and chemistry on preserved organic and palaeoenvironmental remains: where ground water levels are lowered, this may result in the possible degradation of remains through de-watering; 4. The potential impact of hydro-morphological adaptations on heritage assets: this can include the modification/removal of historic in-channel structures, such as weirs /coastal and estuarine features such as historic sea defences; as well as physical changes to rivers/the coastline with the potential to impact on archaeological and palaeoenvironmental remains;	

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

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

Evidence gathering

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

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

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

	It is important to note that archaeology can be deeply buried and/or buried by deposits such as peat and alluvium, which can mask archaeological remains. In these cases, standard evaluation approaches (e.g. some geophysical techniques) may not be able to identify archaeological remains and so alternative approaches may be needed (e.g. geoarchaeology geoarchaeology and deposit modelling deposit modelling , increased use of evaluation excavations etc.). Although it may be appropriate for this evidence gathering and assessment to take place at the more detailed design/application stage, it is important to raise these issues and signpost how they might (further down the line) be tackled in relation to physical infrastructure interventions. Please note also that in order to take account of unrecorded and non-designated archaeology, the relevant Historic Environment Record should be referred to, and the views of local authority archaeological advisers sought. Further research relating to drought We also refer you to a recent research project that you may already be aware of. It was a research council funded project on drought issues. It was led by Professor Lindsey McEwen (Director: Centre for Water, Communities and Resilience), Department of Geography and Environmental Management, University of the West of England. It was called 'DRY' which stands for 'Drought risks and you'. The web site is http://dryproject.co.uk/ The aim of the project was to build a better picture of drought risk and coping with drought. This may be helpful to you as you develop the Plan. Specific Feedback on the previous Drought Management Plan There is very little mention of heritage assets and their settings or the historic environment throughout the Plan. The only reference is at section 6.2 which states that 'We do not consider that our actions in this plan would impact on cultural or heritage sites'. However, we consider that the drought Plan does have the potential to impact on heritage assets for the reasons set out in this letter. Therefore, in the next Drought Plan, reference should be made to historic environment issues outlined above. The current Plan is very focussed on impacts on customers and also the natural environment. Some consideration should also be given to impacts on the historic environment in drought scenarios in the new Plan.	

	Heritage assets may be at risk of harm through drought events. We list some examples of ways in which heritage assets could be at risk below: • A listed watermill that relies on the flow of water could be at risk • A registered park and gardens with water features could be at risk • A scheduled monument that has been designated because of the importance of the presence of internationally important waterlogged archaeology could also be at risk • Drought can harm plants that make up designed and historic landscapes • Drought can affect archaeological deposits, in particular waterlogged deposits, affect the stability of buildings and other structures • Desiccation of wetlands can have a dramatic effect on the preservation of waterlogged archaeological and palaeo-environmental material • The drying out of certain geologies (for example, clay) can affect ground stability and increase subsidence affecting historic structures and affecting archaeological sites. It can also lead to increased erosion • Preservation (in the ground) will become increasingly difficult as these damaging cycles create stressful environments for buried archaeology, see our guidance on Preserving Archaeological Remains). (2016) The question is therefore what could and should be done in a drought situation to reduce impacts on the historic environment. The strategies to seek to minimise impacts on the historic environment should be set out in the Drought Plan. Consideration should be given to long-term predicted changes to climate in cumulative impacts or when modelling risk to understand impacts. Effects of drought (eg. soil cracking, reduced vegetation, increased risk of wildfires) can magnify secondary impacts (eg. erosion) when severe storms/rain hit after a period of drought. These extreme events are becoming more frequent. Works affecting site hydrology may increase a site's vulnerability to predicted climate impacts. Conversely, measures to control affected areas could improve landscape resilience, so their plans may have positive outcomes. If possible, cumulative impacts should consider those beyond the immediate effects of any plans. This will obviously include a level of uncertainty, but it would be good to see that changes to rain patterns have been considered as part of a wider climatic system.	

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

2.2 Consultation on the Draft Plan

We will publish our draft plan to Defra by the 31st of March and following direction to publish our draft from the Secretary of State, there will follow a further public consultation on the draft plan and a statement of response to representations received.

The legislation and Drought Plan Regulation guidelines for consultation on the Drought Plan indicate that the following groups must be notified of the consultation, along with any organisations involved in pre- consultation discussions.

- The Secretary of State for Environment Food and Rural Affairs
- The Environment Agency
- Ofwat
- Relevant water undertakers – Severn Trent
- The relevant Local Authorities
- Natural England
- English Heritage
- Canal and Rivers Trust (formerly British Waterways)
- The Consumer Council for Water

In addition to meeting these minimum requirements for consultation the Company will undertake additional consultation with a selection of interest groups or individuals.

- Members of Parliament
- The British Horseracing Authority
- The British Swimming Pool Federation
- The Car Wash Association
- The Horticultural Trades Association
- The National Council for the Conservation of Plants and Gardens
- The Royal Yachting Association
- The Racecourse Association
- The Turfgrass Growers Association
- The National Farmers Union
- The Country Land and Business Association Limited
- The Drinking Water Inspectorate
- The Angling Trust
- The Cambridgeshire Beds and Northants Wildlife Trust

Stakeholders wishing to make representations, comments or raise questions on the draft plan are advised to submit them to:-

Defra

Water Company Drought Plan

Department for Environment Food and Rural Affairs

3rd Floor

2 Marsham Street

London

SW1P 4DF

Or by E-mail to water.resources@defra.gsi.gov.uk

The consultation will be communicated to these parties by direct correspondence, and to the wider public via the Company website, a press release and any other appropriate communication channels.