



BY EMAIL: consultations@thameswater.co.uk

Thames Water Business Plan Consultation
Facts International LTD
Ashford
TN24 8BR

24th June 2013.

Dear Sir/Madam,

Thames Water - Draft five-year plan 2015 - 2020

Background to comments.

The Cotswolds Area of Outstanding Natural Beauty is covered by three water companies. By far the largest area of the AONB lies within Thames Water and includes the principal Thames tributaries of the Evenlode, Windrush, Leach, Coln and Churn as well as the source of the Thames and the key oolitic limestone aquifer.

Bearing in mind the purposes of AONB designation and those of the Board (see appendix 1), our comments are limited to the sections of the consultation dealing with water availability, good quality water and protecting the environment.

Response to consultations

The Cotswolds AONB Management Plan 2013 -18 identifies water supply as one of the special qualities of the Cotswolds AONB. Both the Cotswold rivers and Oolitic limestone aquifer are important sources of water, principally for large areas outside the AONB. Thames Water, in particular, relies on water from the Cotswolds.

The two issues affecting water in the Cotswolds are natural low flows during periods of drought and diffuse water pollution. Consequently the Board is looking to the Five Year Plan to:

- Avoid exacerbating low flows through water abstraction
- Work with land managers and farmers to reduce diffuse water pollution to improve water quality. The benefit to Thames Water is the reduction of water treatment costs.

Low flows (water availability)

The rivers in the Cotswolds are fed by the oolitic limestone aquifer and are prone to low flows during periods of low rainfall leading to the concentration of pollutants and loss of habitat and wildlife. Whilst the largest volume abstraction points are downstream of the Cotswolds, Thames Water does abstract water from the aquifer within the AONB e.g Brasseley, near Bourton-on-the-Water. It is important that abstraction does not exacerbate low flows. To help achieve this, the Board supports Thames Water's plans

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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to reduce demand by promoting water use efficiency and continued programme to reduce leakage.

Diffuse Water Pollution (Good quality water)

Tackling diffuse water pollution should be a priority but is only given a brief mention in the plan. There are currently 50 Catchment Sensitive Farming Projects across England, most, if not all, funded by Defra via the Environment Agency and Natural England. One of the major beneficiaries of these projects is the water industry and its customers. Research is showing that preventing diffuse pollution is more cost effective than traditional water treatment.

Consequently, the Board encourages Thames Water to engage in and support catchment management schemes. The Board would be interested in becoming involved where catchment management is being considered within the Cotswolds.

Protecting the Environment

The Board supports the increase in energy efficiency and energy generation from sewage. However, there are other technologies Thames Water should be adopting, particularly within its own estate. Other forms of renewable energy should be considered such as photovoltaics, and micro-hydro. Buildings could be heated by ground source heat and woodfuel. Whilst this involves investment, payback times are shortening due to the rising cost of energy.

Improved treatment of sewage is supported. Better sewage treatment leading to reduced phosphates etc being put back into rivers not only contributes to achieving the requirements of the Water Framework Directive but also benefits extraction and water treatment for drinking water supply further downstream.

If you have any questions or would like to discuss any of the above responses, please do not hesitate to contact me.

Yours faithfully



Mark Connelly
Land Management Officer

Appendix 1

Cotswolds Area of Outstanding Natural Beauty (AONB)

The Cotswolds Area of Outstanding Natural Beauty (AONB) was designated in 1966 and extended in 1990, under the National Parks and Access to the Countryside Act 1949. The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area.

AONBs are also recognised and valued at the international level. The World Conservation Union (IUCN) considers AONBs to be of international importance as Category V Protected Landscapes and are therefore listed on the World Database of Protected Areas compiled by the United Nations Environment Programme's World Conservation Monitoring Centre

Cotswolds Conservation Board

The Cotswolds Conservation Board was established by Parliamentary Order under part iv of the Countryside and Rights of Way Act 2000. The purposes of the Board are :

- To conserve and enhance the natural beauty of the Cotswolds AONB
- To increase the understanding and enjoyment of the special qualities of the AONB, ensuring these are compatible with its conservation and enhancement.

In carrying out its twin purposes, the Board shall seek to foster the economic and social well-being of its local communities.

The CROW Act 2000 underlined the importance of AONBs and introduced specific requirements for local authorities and public bodies, including water companies, in looking after these special areas. Section 85 of the Countryside and Rights of Way Act 2000, places a duty on public bodies to have regard to the purposes of AONB designation when carrying out their functions in relation to, or so as to affect, land.

The Board is responsible for producing the statutory management plan for the Cotswolds AONB as required by section 89 of the CROW Act and in doing so, involves a wide range of agencies, authorities, organisations and individuals with an interest in the Cotswolds through participatory events, surveys and consultation. The 2013 – 18 plan, adopted in March 2013, was subject to a Strategic Environmental Assessment and Appropriate Assessment and has wide support, including the 15 local authorities with territory within the Cotswolds AONB.