

BY EMAIL: consultations@thameswater.co.uk



Dear Sir/Madam,

Thames Water – Draft Long-term Strategy 2015 – 2040

Background to comments.

The Cotswolds Area of Outstanding Natural Beauty is covered by three water companies. By far the largest part of the AONB lies within the area of 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 on the draft Long-term Strategy are limited to the sections of the consultation dealing with water resources, water treatment and wastewater treatment. The comments strongly reflect those made in the Board's response to the Thames Water draft Five-year Plan 2015 – 2020.

Response to consultation

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 Thames Water through the Long-term Strategy 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.

Water resources strategy

With a statutory duty to supply drinking water against a background of climate change and increasing population, Thames Water faces a tough challenge particularly with water deficits already predicted for 2015 and 2040. Reducing leakage, promoting water use efficiency and improving links between supply zones are priorities supported by the Board.

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

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Looking to develop ground water schemes within the Cotswolds is a concern for the Board. The Oolitic limestone of the Cotswolds in the west of the Thames Water area is an important aquifer already relied upon for water abstraction. Cotswold rivers such as the Windrush, Coln, Leach and Churn are largely 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. Further ground water abstraction from the Oolitic limestone could exacerbate low flows. Consequently the Board would consider objecting to further abstraction from within the AONB

Water treatment Strategy

As the draft Strategy states 'the better the quality of water we take from the environment, the less treatment it requires'. The water quality in some Cotswold rivers and ground water resources is poor due to diffuse water pollution and to sediments, for example from agriculture, water treatment works and run-off from roads. Research is demonstrating that preventing diffuse pollution is more cost effective than traditional treatment. Consequently the Board encourages Thames Water to develop its engagement in catchment management and would be interested in becoming involved where catchment management is being considered within the Cotswolds

Wastewater treatment strategy

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 abstraction 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.