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14<sup>th</sup> October 2013.

Dear Sir/Madam

**Water for life and livelihoods. Thames River Basin District: Challenges and choices**

**Background to comments.**

The Cotswolds Area of Outstanding Natural Beauty (AONB) is drained by two major river basins, the Severn and the Thames. The most significant in terms of water resource is the Thames River basin, for which the Cotswolds are in turn an important source of water from both the rivers and Oolite aquifer. The principal Cotswold rivers which form the Cotswold Catchment - the Evenlode, Windrush, Leach, Coln and Churn – all drain into the Thames, the source of which also lies within the Cotswolds AONB.

These rivers, and the landscapes that are associated with them, are essential elements in the Cotswolds. They add beauty to the valleys through which they run, create attractive village scenes that draw tourists from around the world, and support a diversity of wildlife. Without these rivers, the Cotswolds would not be the nationally outstanding landscape that it is. Maintaining the health of these rivers is therefore a central responsibility for all concerned.

**Response to consultation**

The newly-adopted Cotswolds AONB Management Plan 2013 -18<sup>1</sup> identifies water supply as one of the special qualities of the Cotswolds AONB. Both the rivers and Oolitic limestone aquifer are important sources of water.

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<sup>1</sup> The Cotswolds AONB Management Plan 2013-18 is a plan required by section 89 of the CROW Act 2000; a range of public service providers is statutorily obliged to take it into account.

The two greatest threats to the part played by water in the Cotswolds are low flows during periods of drought, and diffuse water pollution. Other areas of concern are the impact of invasive non-native plant and animal species, and constraints on the role the Cotswolds can have in mitigating exceptional flooding events. Whilst the River Basin Plan does not cover flooding, there are clear links between managing land for flood management, and protecting and improving the water environment. Consequently the Board is looking to the Environment Agency through the Thames River Basin Management Plan to:

- Avoid exacerbating low flows through excessive water abstraction
- Work with land managers and farmers to reduce diffuse water pollution so as to improve water quality.
- Take action to control and limit the spread of non-native species
- Work with land managers to develop natural flood management

It is also important that the Environment Agency recognise the requirement placed upon it by Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purposes of AONB designation. Therefore, impacts on the special qualities of the Cotswolds AONB need to be taken into account when considering measures to protect and improve water quality.

### **Low Flows and abstraction**

The Oolitic limestone of the Cotswolds is already subject to water abstraction; the Board would be very concerned if there were plans to expand volumes of abstracted water, or create any new water abstraction schemes. Any further abstraction would adversely affect the flow of Cotswold rivers, such as the Windrush, Coln, Leach and Churn, which are already prone to low flows during periods of low rainfall, with consequent concentration of pollutants and loss of habitat and wildlife. All these rivers were classed as 'No Water Available' in the last round of Catchment Abstraction Management Strategies and the Board would object to any further abstraction of water from within the Cotswolds AONB.

### **Diffuse water pollution**

80% of the Cotswolds AONB is farmed, divided almost equally between arable and pasture. Consequently the Cotswolds is a source of diffuse water pollution, particularly metaldehydes, nitrate, phosphate and sediment. A Catchment Sensitive Farming Project has been in operation in the Cotswold catchment for the last two years with some success. It is essential that working with farmers is continued.

Ultimately, it is the public who must fund dealing with diffuse pollution, whoever meets the immediate costs, and research has shown that preventing diffuse pollution is more

cost effective than traditional water treatment. Water companies such as Thames Water, who are the main beneficiaries of prevention at source, should be encouraged to meet the costs of such work, as far as this can be achieved.

### **Natural flood management**

Advice and guidance for land managers to prevent diffuse pollution should also include measures for natural flood management. While many landowners and managers in the Cotswold catchment are keen to improve drainage to enable land to shed water more efficiently, this approach is often misguided. Instead the Environment Agency should work with landowners and managers to encourage water to move more slowly through the catchment by increasing soil infiltration, reducing flow connectivity and storing water on land during flood events. This not only reduces flooding downstream but can also improve water quality by trapping sediments and other pollutants.

### **Invasive non-native species**

There are two relevant policies in the Cotswolds AONB Management Plan 2013 – 18:

*BP1: There is no further net loss of characteristic habitats and species*

*BP4: Targeted action is taken for the recovery of characteristic species and the enhancement of characteristic habitats*

Non-native species of particular note in the Cotswold catchment are the signal crayfish and mink. Himalayan balsam is also present on some stretches of river. It is important that invasive non-native species are controlled or eliminated and their spread prevented.

### **Impacts on the Cotswolds AONB**

Any actions coming out of the Thames River Basin Management Plan and individual Catchment Management Plans should take account of the purpose of AONB designation. One example is the potential impact of watercourse fencing. Permanent watercourse fencing can be intrusive in the landscape and the fenced off area can become overgrown with rank vegetation and colonised by non-native species such as Himalayan balsam and Japanese knotweed

The Landscape Strategy and Guidelines, developed from the Cotswolds AONB Landscape Character Assessment by the Cotswolds Conservation Board, identify watercourse fencing as a potential threat to the Cotswold landscape. Permanent fencing can be intrusive in the landscape, particularly in the more open flood plains of the Evenlode and Windrush. Permanent fencing can also be a problem by trapping unsightly debris and impeding water flow.

Permanent watercourse fencing may be appropriate in some circumstances but it should not be the automatic response. Instead, the Board believes that a more considered approach should be adopted, taking into account the need for the fencing and whether an alternative solution, such as temporary fencing or reduced stocking density, may be more appropriate in terms of environmental and visual impact as well as reducing costs.

### **Prioritising and tackling the issues**

As stated, the Cotswolds Conservation Board's priorities for the area are i) avoiding exacerbating low flows, ii) tackling diffuse pollution, and iii) encouraging natural processes of water management. To summarise, we believe that:

- The Environment Agency should avoid exacerbating low flows by a strict policy of water abstraction licensing.
- Natural England, the water companies and land managers should tackle diffuse pollution in partnership, using the New Environmental Land Management Scheme (NELMS) and the Catchment Management Group approach as piloted in the Upper Thames Catchment.
- the Environment Agency should lead in encouraging land owners and others in the catchment to adopt a more natural approach to flood management.

### **SEA Scoping Document**

The SEA scoping document has identified the key environmental issues including landscape and in particular effects on landscapes designated for their quality. The list, table 2, of plans, policies and programmes relevant to the Thames RBD needs to include the Cotswolds AONB Management Plan 2013 – 2018 adopted and published by the Cotswolds Conservation Board in 2013.

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  
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