

# Response form

## Water for life and livelihoods: Challenges and choices

### Your details

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<p><b>When we come to analyse the results of this consultation, it would help us to know if you are responding as an individual or on behalf of an organisation or group. Please select from the following options:</b></p> <p><input type="checkbox"/> Responding as an individual</p> <p><input checked="" type="checkbox"/> Responding on behalf of an organisation (<i>Please specify which organisation or group you are responding on behalf of and include what type it is e.g. business, environmental group</i>) <b>Cotswolds Conservation Board- established by Parliament to conserve and enhance the Cotswolds Area of Outstanding Natural beauty</b></p> <p><input type="checkbox"/> Other (<i>please specify</i>) _____</p> <p><b>Put a cross in this box if you are requesting non-disclosure of your response. <input type="checkbox"/></b> <b>Please provide an explanation to support your request.</b></p>	

### How the Environment Agency will use your information

The Environment Agency will look to make all responses publicly available during and after the consultation, unless you have specifically requested that we keep your response confidential.

We will also publish a summary of responses on our website in which we will publish the name of the organisation for those responses made on behalf of organisations.

We will not publish names of individuals who respond.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but we will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it

## We welcome your views on the Severn River Basin District

### The significant issues

#### 1) What do you consider to be the biggest challenges facing waters in the Severn River Basin District?

The newly-adopted Cotswolds AONB Management Plan 2013 -18 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.

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 Severn 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.

**2) Do you agree with our description of how the significant issues are affecting the water environment and society? Please specify which issue(s) your response refers to and provide relevant information to help explain your answer.**

The Board broadly agrees with the descriptions. However, the consultation document does not recognise the importance of the water environment for landscape and public appreciation and enjoyment.

The principal Cotswold rivers which lie within the Severn River Basin include the Bristol Avon, Frome, Chelt and Isbourne.

These rivers, and the landscapes that are associated with them, are essential elements of 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.

**3) How do you think these issues should be tackled, and what would you choose to do first? Please specify which issue(s) your response refers to. Please consider any resource implications.**

### **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 most of which are already prone to low flows during periods of low rainfall, with consequent concentration of pollutants and loss of habitat and wildlife. Consequently 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 Severn Trent Water and Bristol 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.

### **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.

### **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 river basin 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.

### **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.

## The catchments

**4) How are the significant issues in a catchment affecting the water environment and society? Please specify which catchment(s) your response refers to and provide relevant information to help explain your answer.**

The relevant catchments for the Cotswolds AONB are:

- Warwickshire Avon
- Severn Vale
- Bristol Avon & North Somerset Rivers

The issues and their impacts are the same as in questions 1 and 3 above

**5) How do you think the challenges affecting each catchment should be tackled and what would you choose to do first? Please specify which catchment(s) your response refers to. Please consider any resource implications.**

Please see responses to questions 2,3 and 4 above

## Strategic Environmental Assessment (SEA) scoping document

6) The SEA scoping document is used to identify environmental effects that are important at the river basin district level and will affect the plan to improve the water environment. Do you agree we are focussing on the key environmental effects?

The Board agrees that the SEA is covering the key environmental effects. The Board also notes the inclusion of AONB and National Park Management Plans in Appendix A, table 2. The link to the Cotswolds AONB Management Plan is:

[http://www.cotswoldsaonb.org.uk/management\\_plan/index.html](http://www.cotswoldsaonb.org.uk/management_plan/index.html)

We can supply a hard copy if required.

7) Is there any other information that we should be taking into account as part of this strategic environmental assessment?

If you would like your response to apply to one or more of the other river basin districts, please select all that apply from the list below.

- Anglian
- Humber
- North West
- Northumbria
- South East
- South West
- Thames

Please tell us how you found out about the Challenges and choices consultation:

- From the Environment Agency
  - From another organisation
  - Through an organisation you're a member of
  - Advert
  - Press article
  - Social media e.g. Facebook, Twitter
  - Through a meeting you attended
  - Other (please specify)
-

## Returning your response

Your response to this consultation needs to be returned by **22 December 2013**.

We would like you to use this form if you are not submitting your response online. You can return it by email to [SevernRBD@environment-agency.gov.uk](mailto:SevernRBD@environment-agency.gov.uk). Please use this email address if you have any questions regarding this consultation.

Or you can return it by post to:

Suzanne Bennett  
Environment Agency  
Sapphire East  
550 Streetsbrook Road  
Solihull  
B91 1QT

## Other comments

This form is to be used when responding to the **Water for life and livelihoods: Challenges and choices consultation**. If you have any queries or comments in relation to other issues you would like to raise with us, please contact our National Customer Contact Centre:

Tel: 03708 506 506 (Mon-Fri, 8am - 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

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