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RESPONSE TO THE ENVIRONMENT AGENCY CONSULTATION PAPER:

DRAFT WATER RESOURCES PLANNING GUIDELINE

This paper sets out the Cam Valley Forum's response to the [Consultation paper](#) issued in July 2020.

Q6 Do you have any concerns, suggested improvements or comments regarding the guideline that you would like to highlight?

The guideline fails to underline the rarity and global significance of the 225 Chalk streams in the UK (some 85% of the known world total of this habitat type). In a natural state, the constant year-round temperature of water from Chalk aquifers, its stable chemistry, and reliable supply through periods of low rainfall, supports distinctive and fragile habitats. Yet Chalk streams have been significantly damaged by many decades of over-abstraction, exacerbated by pollution and habitat modifications. In the Cam Valley, the fact that 14 groundwater support schemes have been put in place since 1990 to support some 30 headwater Chalk streams testifies to the extent and long-standing nature of the low-flow problems caused by over-abstraction. Many local wetlands and distinctive wetland species have been lost.

The exhortation on page 39 '*Your plan should protect and improve the environment, for example, by providing greater protection to sensitive habitats and vulnerable rivers, such as chalk rivers*' is welcome but needs to be strengthened. It should repeat the statement in the Defra/EA/OFWAT 'Green Future' letter to water companies of 21/08/20: '*Restoring England's internationally important chalk stream habitats is a government priority. Many suffer from low flows, poor water quality and habitat loss and we need your help to tackle these pressures. Positive work is already improving these catchments and it is important that you continue to work through regional water resource planning groups and with regulators to agree a clear long term environmental destination. We want to look at what further action you can take to improve the condition of chalk streams, including by tackling groundwater infiltration and storm overflows.*'

Against this background, all relevant sections of the paper should include a paragraph highlighting the particular need, in water supply zones that abstract water from Chalk aquifers, to develop a sensitive and tailored approach that reflects the distinctive value of Chalk streams as environmental assets of national and global significance. The overall strategy should be to:

- (a) Cap abstraction from Chalk aquifers permanently at current levels.
- (b) Meet any additional demand not from the aquifer but from water transfers from surface water sources.
- (c) Progressively close or reduce abstraction from boreholes so that Chalk streams run naturally, throughout the year, every year, whatever the weather.

(d) Invest as necessary in new downstream reservoirs, treatment and distribution infrastructure to abstract the water as surface water instead.

For an assessment of the impacts of over-abstraction, role of groundwater support schemes, and actions to restore flows to Chalk streams, please see our *Let it Flow!* report, attached. This is also available on the Cam Valley Forum website at <https://camvalleyforum.uk/water/#waterresources>.

Q7 Do you believe that the guideline allows water companies to produce plans with secure and resilient water supplies?

Water supplies must not be pursued regardless of the cost to the environment. Affinity Water and Cambridge Water can probably obtain all the water they need from the Cam Valley if they close or dramatically reduce abstraction from their current boreholes and instead abstract the water as surface water further downstream. This may be more costly, and they may need to arrange additional water transfers from elsewhere, but this operational model will be much less damaging to the environment because Chalk streams will no longer be losing their water at source. The guideline needs to be framed so that it leads water companies to deliver secure and resilient water supplies *in ways that have the least possible damaging impact on the environment*.

Q8 The 25 Year Environment Plan states that it is the Government's ambition to leave our environment in a better state than we found it. Do you think the guideline sufficiently contributes to this aim?

The guideline needs:

(a) To highlight the need for a sensitive and tailored approach in water supply zones that abstract water from Chalk aquifers (see response to Q6).

(b) To make it clear that water companies need to deliver secure and resilient water supplies in ways that have the least possible damaging impact on the environment (see response to Q7).

Q9 The guideline incorporates a natural capital approach into decision-making. Do you agree with the approach set out in the guideline and supplementary guidance which combines the natural capital approach, biodiversity net gain and Strategic Environmental assessment into decision-making?

Despite a request, the Supplementary Guidance on natural capital has not been provided. We support the use of natural capital approaches to inform decision making in principle but decisions should not be based on monetised approaches alone. In assessing natural capital it is important that water bodies are not treated as if they are all equal. Chalk streams are distinctive, rare and fragile habitats (in the UK and globally). These points need to be reflected in assessments of the benefits that they currently provide to society or could do, if better protected and managed.

Q10 We are facing a climate emergency. Do you think our guideline adequately addresses this challenge?

Again we have not yet seen the Supplementary Guidance. It is essential to assess the implications of climate change (we are *in* a climate emergency, not just *facing* it). It is also important to consider the impacts of future development, which will add to existing pressures on water resources, especially in Cambridge (possibly now the fastest-growing city in Europe). However, it is also important to focus

on remedying the damaging past and current impacts of water abstraction on the environment. Water companies that abstract from Chalk aquifers will need both to tackle past impacts, to restore Chalk streams, while also planning to cater for future impacts, to ensure that there is resilience not only for water supplies but also for the water environment.

Q12 Our guidance asks companies to plan on the basis that the: water available is that they would have in a severe drought (with a probability of a 0.2% occurrence each year or known as a 1 in 500 drought); demand in a hot dry year before temporary use bans are in place (known as dry year annual average). This is considered to be a worst case scenario. Do you think this approach is appropriate? Or should water companies plan for a demand for water under the same severe drought scenario as their water supply assumptions?

The Guideline (section 4.7, page 31) asks water companies to 'explain the frequency that you plan to restrict water supplies for your household and non-household customers using temporary use bans and non-essential use bans.'

We consider that Water Company Service Levels need to be revised to take full account of environmental impacts. Current service levels focus entirely on the supply of water, the implication being that supplies must always be maintained to meet the standards set, regardless of the environmental impact.

We consider that the guideline should be amended to make it clear that water companies that abstract from Chalk aquifers should:

- (a) Define their service levels from the starting point of ensuring that Chalk streams flow naturally throughout the year, every year, whatever the weather.
- (b) Promote a fundamental shift in public attitudes by getting people to understand that water is precious and it is reasonable to have Temporary Use Bans every summer, e.g. from May to August inclusive (not just as for Cambridge Water 'once in 20 years'), and Non-Essential Use Bans also far more frequently (not just as for Cambridge Water 'once in 50 years').
- (c) Adjust their drought triggers to reflect the risks of environmental damage to Chalk streams during periods of dry weather. The result should be that publicity campaigns, Temporary Use Bans and Non-Essential Use Bans are always introduced sooner than at present.
- (d) Align their Drought Management Plans, which currently focus solely on supply side actions, with the Environment Agency's drought response framework, which is informed and driven by the need to safeguard the water environment.

We would also commend to the Environment Agency the more detailed, nuanced approach to drought management adopted (and proven in practice) in South Africa. The UK could learn a great deal from this exemplar. The Cam Valley Forum report *Let it Flow!* provides a summary and links to further sources of information.
