



Secretary of State,  
Department for Environment Food and Rural Affairs (Defra),  
Drought Plan Consultation,  
Water Availability and Quality Programme,  
Area 2C, Ergon House,  
Horseferry Road,  
London, SW1P 2AL

12th January, 2012

Dear Sir,

### **Veolia Water Central Draft Drought Management Plan 2011**

The Dacorum Environmental Forum Water Group welcomes the opportunity to comment on this draft plan. The Group appreciates the serious implications of the lack of rainfall over the last year and that the scenario that Drought Zones 3 or even 4 are distinct possibilities. The Group recognises that under drought conditions water supplies may have to take priority over riverine environmental issues. Nevertheless we believe that more attention could be paid in the Drought Management Plan to the impact of drought conditions on the water environment.

Clearly the water company's heavy reliance on groundwater sources from the Chiltern aquifer, 60% of total supply, has potentially serious environmental implications, in drought conditions for the Chilterns AONB and its valuable chalk streams in terms of low flows and even waterless rivers with consequential widespread ecological damage. What for instance would be the implications for the Chiltern chalk streams of a drought of Zone 4 scale? Could this not be spelled out in the final plan?

The Group is particularly concerned about the riverine environment of the valleys of the rivers Gade, Bulbourne and Ver. Our main concern is that the plan does not adequately indicate what the environmental effects of severe drought conditions on these rivers would be. The potential Environmental Impact Statements in appendix 6 are designed to show the impact of additional abstraction from certain rivers. We note what is said about the Gade in paragraph 4.4.6 and the complications arising from its interactions with the Environmental Impact Statements to showing the impact of groundwater abstraction on the Chiltern chalk streams in general and on rivers such as the Gade, the Bulbourne and Ver in particular? It would appear that the main means of monitoring these rivers will be solely by photographs as set out in Appendix 5.

The Drought Management Plan as presented previously treated drought as some exceptional occurrence i.e. less than 40% rainfall when this is to be expected from time to time. Yet under climate change scenarios we can expect the frequency of extreme events to increase, so it is appropriate to consider these events as becoming more common, but the approach appears to be responsive and focused on supply management rather than developing 'adaptive capacity' of people or the environment. There is some acknowledgement of demand management but not to the same extent. Adaptive capacity as a strategy has become more influential over the last decade and places emphasis away from simply using technology to greater emphasis upon planning and behavioural changes. The DMP is presented as responding to an inevitable problem based upon lack of rainfall whereas the problem is really a lack of water through 20<sup>th</sup>/21<sup>st</sup> Century catchment land use changes. I suspect that this will only begin to be addressed through some form of metering and monitoring i.e. demand reduction but this is not without problems.

I have previously written identifying the need for enhanced catchment storage of water and the potential role of wetlands under sustainable urban drainage (SUDS) together with the placement of sewage treatment plants as a key strategy, particularly in the headwaters of the river basin. I am disappointed at not receiving a response.

Although it is beyond the immediate remit of the Group, it is noted with regret that the rate of metering has slowed which can only aggravate a drought situation. We also query the scope of increasing bulk transfers from other sources when such sources are likely to be already overstressed.

The Dacorum Environmental Forum Water Group trusts that these comments will be helpful in finalising the Drought Management Plan.

Yours sincerely,

Roger Hands,  
Chairman,  
Dacorum Environmental Forum Water Group

## **Appendix of questions pertinent to Veolia Water Drought Management Plan**

Pg 14 2<sup>nd</sup> para – they mention they are relying on Thames water to maintain flows on the lower Thames. How certain are they that this will be possible in a serious drought situation?

Pg 17 Table 1.2 – How many days of supply would the emergency sources last for?

Pg 25 Zone 1 – Drought awareness .. what extra monitoring is done and how is this disseminated to the EA.

Pg 25 Zone 2 – Voluntary Demand Restrictions .. how will the public be made aware?

Pg 26 last para .. How is the SMD calculated?

Pg 31 first bullet point, what exactly is meant by ‘Season’ is it just summer (June to September) or do you count summer as May to August, what do you define spring and autumn as?

Pg 32 Use of Oxford rainguage, Oxford is a long way away and on the other side of the Chilterns. Is some sort of adjustment made to the long term record to account for the difference in climatic conditions between Oxford and the Veolia Water supply area. There is also quite a difference across the supply area itself, the east being much drier than the west.

Pg 54 Table 4.4 title says Examples of Periodicity of monitoring ... but the table doesn't seem to show this.

Pg 56 4.6.2 Ver Catchment ... operating FRIA will also delay recovery. What about the augmentation of flows at Michael's Bridge, has this been occurring, how is it triggered, do the EA tell Veolia when to augment?

Pg 56 4.6.4 Mimram catchment ... What sort of monitoring was done in 1997 when there was a significant reduction from FULL, was the river already dry, was there any effect on the nearest OBH levels? What does the phrase ‘We have been notified by the EA that they will impose sustainable abstractions declines on the FULL licence’ mean? Is the abstraction at FULL to be reduced permanently as part of an RSAp scheme.

Pg 57 4.6.6 Gade Catchment .. what about effects on flow of PICCT and MARL pumping stations?

Pg 58 4.6.11 River hiz... when I saw the pond upstream of Charlton Mill in Jan 2011 the lining had been pushed up in a number of places so it looked like there was a small whale in it. Pond was stocked with ghost koi carp. River Restoration Centre has made recommendations for river restoration options for the Hiz from source to confluence with Henlow Bridge TL18803832.

Dacorum Environmental Forum Water Group