

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 and Bulbourne. 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 Grand Union Canal. However, would it not be possible to extend the principle of 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 and the Bulbourne in particular? It would appear that the main means of monitoring these rivers will be solely by photographs as set out in Appendix 5.

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 Group trusts that these comments will be helpful in finalising the Drought Management Plan..