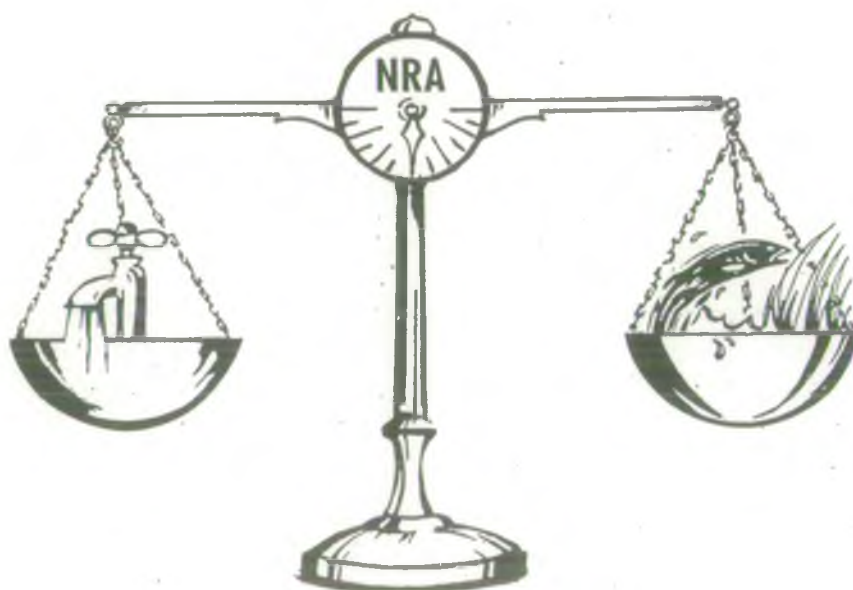




**WATER RESOURCES STRATEGY
REPORT ON PUBLIC CONSULTATION**



*National Rivers Authority
Anglian Region*

DECEMBER 1993

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WATER RESOURCES STRATEGY: REPORT ON PUBLIC CONSULTATION

1 SUMMARY

This report summarises the public response to NRA, Anglian Region's "Water Resources Strategy - Consultation Draft".

During the four month consultation period (May to Aug 1993) 115 written responses were received, together with many contributions at public meetings. We are pleased that the tenor of the public's response is of general support for the 'package' of measures which we put forward towards our objective of "secure water supplies and a better environment."

This document summarises the many comments for public dissemination. We will use this summary as input to our Regional Water Resources Strategy, to be published in 1994.

2 INTRODUCTION

2.1 The Water Resources Strategy - Consultation Draft

Anglian Region's "Water Resources Strategy - Consultation Draft" was launched on 27th April 1993. It describes the region's water resources and the demands upon them, human and environmental; it analyses the development and management options and puts forward a Draft Strategy for public discussion.

When refined in the light of consultation and of NRA's National Strategy, the Regional Strategy will be a framework within which all concerned can work together towards the stated aim of "Secure Water Supplies and a Better Water Environment".

2.2 The Consultation Process

Launch of Consultation Draft Strategy	27th April 1993.
A 4 month consultation period	May to Sept 1993.
Consultation Review	Sept to Nov 1993.

15 meetings were held around the Region, attended by invited audiences totalling over 500. 550 copies of the full Consultation Draft and questionnaire were circulated and 5000 leaflets distributed to raise awareness of the issues and invite comments.

Comments were received at the Water Resources presentations and at the NRA's consultative committee meetings. Some 72 questionnaires were returned. 43 additional letters and reports were received. 115 organisations and individuals responded and are listed in Appendix I. A summary of the questionnaire replies is given in Appendix II. A summary of the various other comments which were offered is given in Appendix III.

3 THE MESSAGES

The responses have been many and varied. Few issues produced a clear consensus view, and in many cases there were diametrically opposite opinions. Clearly it is impossible to act on every individual comment. However, several themes emerge, which we summarise below and will carry forward to the full strategy in 1994.

3.1 **The Proposed 'Package'**

We put forward a 'package' of measures to achieve a reasonable balance between competing interests. Our subtitle is "secure water supplies and a better environment". We see these twin objectives as being of equal importance and we intend to achieve both.

We are pleased that the general tenor of the public's response is of support for that 'package'. Not everyone agreed wholly with it, but most disagreements were on points of detail, or were related to particular functional or geographic interests. We take all these points very seriously, and we try to reflect them fairly below, but as an overview we believe that the consultation exercise has endorsed our proposals in principle.

3.2 **Demand Management**

Support for "using water wisely" is universal. There is also a strong view that NRA should do more to achieve it, although few suggestions were made that were both new and practical as to how to do so. NRA will continue to foster wise use, both Regionally and Nationally. But we add a word of warning that 'saving' water in inland areas can actually reduce low flows in rivers which are sustained by returning effluents; the key word should be selective demand management.

The principal means of demand management which respondents stressed were

- metering, with appropriate tariffs which combine care for the environment with care for those who have to pay.
- leakage control
- public education
- more efficient appliances
- incentive charging for water
- "more efficient" irrigation (but again a word of warning; some farmers apply less irrigation than they might, and 'more efficient' could mean more water).

We will carry forward "wise use" as a key part of our water resources strategy.

3.3 Protecting and Improving the Water Environment

There is universal support for "a better environment", but only a minority says "at any price". We think that the consensus view is summed up by "the environment should be protected at the highest sustainable level, within reasonable cost".

We agree fully with this, and with the widely expressed view that English Nature and organisations such as Wildlife Trusts should play an important role in defining conservation criteria. However we must still balance aspirations with practicalities and costs. We note with interest several suggestions of "environmental levels of service" to help us do this, which we shall explore with the appropriate bodies.

3.3.1 The River Environment

We described the many issues which combine to establish the river environment; but we focused the discussion, in a water resources context, on the issues of river flows.

We were pleased with general acceptance of the principle of artificially supporting low flows which might otherwise be unacceptably affected by abstraction. Although one or two respondents queried this 'on principle', others suggested it could be extended to provide better than natural low flows.

Several respondents pressed for the setting of minimum acceptable flows (or perhaps river flow objectives). We agree in principle and are working on it.

There were mixed views on our progress towards putting right low flow problems caused by excessive abstractions; but clear support for continuing to do so subject to budgets and worthwhileness.

3.3.2 The Wetlands Environment

The need to protect wetlands causes widespread concern, which we share. Since publication of the draft, our licensing procedures have been strengthened in this respect, and we have entered into discussions with English Nature and others regarding Wetland monitoring and protection.

3.4 Meeting People's Needs

Most respondents accept that meeting reasonable human needs at reasonable cost is a valid objective. However many add caveats such as "only if ... no detrimental ecological effects". Almost all believe that if NRA undertakes works to increase reliability of water supplies, then the beneficiaries should pay.

Comments on specific forms of water resource development were as follows:-

3.4.1 Groundwater Development

People view groundwater development with suspicion. Only two respondents opposed it outright, but many others voiced concern, particularly over the potential effects on wetlands. On the other hand several water users pointed out that groundwater is a valuable resource, whose use should not be unnecessarily constrained. We believe that groundwater can be used, but must not be abused, and we will continue to work to that end.

3.4.2 Reservoirs

There is general support for a new reservoir, as and when it is shown to be needed. People clearly recognise both the environmental gains and losses that a reservoir entails and there is a general view that the gains can outweigh the losses. There were several voices in opposition to a reservoir, very understandably, from people who might be adversely affected.

Only one respondent explicitly favoured reservoirs as opposed to groundwater development, but that preference was implicit in many more responses.

There was widespread support for farm reservoirs to store winter water for summer irrigation, and recognition of their environmental value. Several agricultural respondents called for financial incentives for farm reservoirs.

3.4.3 Inter Basin Transfers

Our proposals played down any need for substantial further imports from the Trent, but advocated increased Ely Ouse - Essex transfers. Respondents expressed concern over the effects on water quality, recreation and navigation in receiving rivers. There was particular opposition to any transfers which could cause deterioration in river quality classification.

3.4.4 Possible Reductions in Flows to Estuaries

Several respondents were concerned about potential adverse effects in the Ouse estuary. We share this concern and the issues are already under investigation.

3.4.5 'Other' Options

There were many suggestions relating to desalination, national grid, transfer by canals etc. We retain a 'watching brief' on all of these. Our National Strategy enlarges upon them, but no case has yet been made for them in preference to more conventional developments.

3.5 Licensing and Charging Policies

There is a widespread view that licences of right should be revocable without compensation, and/or that NRA should revoke 'offending' licences even if compensation is payable.

There is also considerable support for proposals for tradeable permits, incentive charges and for bringing 'slacker' abstractions within licensing control. (These are summer transfers of river water 'backwards' into fen drain systems.)

3.6 The Role of Development Planning

There is a clear view that Development Planning and Water Resource Planning should be better integrated. However the view that development plans should actually be restricted where water resources are stressed, is a minority one. The more general view appears to endorse our policy of advising planning authorities of the implications and costs of making water available in an environmentally acceptable way; and for them to include this with all the other factors which influence development planning.

3.7 The Effects of Land Drainage on Water Resources

Two respondents, one of them very forcefully, suggested that reliable water resources are substantially reduced by 'efficient' land drainage. After debate, we believe the effect is real, but limited. We propose some research work to clarify the issue.

4 CONCLUSIONS

We should like again to thank all those who took the time and trouble to listen to our presentations and to offer their views.

We shall now carry forward the results of this consultation exercise into the preparation of our full strategy in 1994, and into our day to day efforts to achieve a better water environment and secure water supplies.

APPENDIX I : CONSULTEES

- * Questionnaire style reply.
- # Questionnaire and/or letter received.
- + Roadshow comment.

- # Agricultural Development Advisory Services
- + ARC
- # Anglian Water Services
- # Babergh District Council
- # Bedford Borough Council
- + Beds Group of Drainage Boards
- * Braintree District Council
- # Breckland District Council
- * Broadland District Council
- # Broads Authority
- + Broads Society
- * Bucks County Council
- + Burn Action Group
- # Cambridge Water Company
- * Cambridge City Council
- * Cambridgeshire Federation of Womens Institutes
- * Cambridgeshire County Council
- * Carlton Parish Council
- * Carlton Residents
- # Castle Point Borough Council
- # Chelmsford Borough Council
- + CIBA Composites
- * Clean Rivers Trust
- * Consultant Hydrogeologist
- * Country Landowners Association
- # Council for the Protection of Rural England
- # Department of the Environment
- * Eastern Council for Sport & Recreation
- # East Midlands Regional Planning
- * East Cambs District Council
- * Ely Group of Drainage Boards
- * English Nature
- * Environmental Consultants
- # Essex County Council
- # Essex Water Company
- * Essex Wildlife Trust
- + F Hiam Ltd
- + Farmer
- + J Garrett (MP)
- # Great Bradley Residents

- * Great Ouse Boating Association
- + Great Ouse Flood Defence Committee
- * Greens of Soham Ltd
- * Great Bradley Parish Council
- # Humberside County Council
- # Huntingdon District Council
- # Individuals
- * Individual/Parish Council
- * Inland Waterways Association
- # Institution of Directors
- * Ipswich Borough Council
- * John R Keeble & Son
- + Joint Anglers Federation
- * King's Lynn Conservancy Board
- # King's Lynn/ West Norfolk Borough Council
- # King's Lynn Internal Drainage Boards
- + Kirtling Residents
- + Lakenheath Internal Drainage Board
- + Local Flood Defence Committees
- # Lincolnshire Trust
- + Lincs & District Angling
- # Lincs County Council
- * Lord de Ramsey
- * Met. Office
- + Mid Beds Councillor (RAC)
- * Mid Beds District Council
- + Middle Level Commissioners
- * Milton Keynes Borough Council
- * Mott Macdonald
- + North Norfolk District Council
- * National Trust
- * National Farmers Union
- # National Farmers Union (East Anglia)
- * National Farmers Union (East Midlands)
- * Norfolk County Council
- * Norfolk Friends of the Earth
- + Norfolk Fisheries and Wildlife Advisory Group
- * Norfolk Naturalists Trust
- + Norfolk Rivers Groundwater Group
- # Norfolk Society
- * Northants County Council
- * Norwich City Council
- # Notcutts Nurseries
- # Notts County Council
- + OFWAT
- * OFWAT Eastern CSC

- # Powergen
- * Ramblers Association Essex
- * Rochford Council
- # Regional Rivers Advisory Committee
- # Royal Society for the Protection of Birds
- + RST Irrigation Ltd
- * Residents for Stour Valley Preservation
- # South Cambridgeshire District Council
- * South Holland District Council
- * South Norfolk District Council
- * Salmon & Trout Association
- # Standing Conference of East Anglian Local Authorities
- # Southend Borough Council
- # Suffolk County Council
- # Suffolk Wildlife Trust
- # Tendring District Council
- * Tendring Hundred Water Services
- * Thetford Society
- * Three Valleys Water Services
- * United Kingdom Irrigation Association (Silsoe)
- # Uttlesford District Council
- * West Wickham Parish Council
- * Waterman Agricultural Engineers
- + Wensum Internal Drainage Board
- * Wensum Valley Project
- * West Wrating Parish Council
- * Westley Residents
- + Willingham Green Residents
- * Woodditton Parish Council

APPENDIX II : RESPONSES TO THE CONSULTATION QUESTIONNAIRE

Chapter 13 of the Strategy contained a questionnaire with 10 questions. This was not a market research exercise in the true sense but was designed to stimulate thought and generate structured discussion on key issues. The resulting responses are summarised as follows. Many consultees did not answer all the questions, so percentage figures do not always add to 100.

Saving Water

Q1: Are there other opportunities for using less water in dry periods, for recycling it or reducing wastage ?

A majority (69%) of responses suggested that there was scope for using less water in dry periods as indicated below. 11% thought that further scope was limited.

23% suggested that irrigation could be applied more efficiently.

19% suggested domestic metering in selective areas and/or leakage control.

8% suggested that publicity/ education was required.

6% suggested increased re-use of effluents.

Q2: Should NRA be doing more to promote and influence the wise use of water ?

A large majority (83%) said yes.

47% suggested improved publicity and education, or Water Company publicity co-ordinated through the NRA.

22% suggested that domestic metering in selective areas should be endorsed/ leakage control target levels set.

8% suggested that NRA should endorse water efficient appliances.

Meeting Water Needs

Q3: Taken as a 'package' are our water resource development proposals acceptable ?

53% said yes, but many added specific comments and suggestions.
20% said no, the most common reasons being:-

- Greater enforcement role required.
- More detailed investigations required to support proposals.
- Too much of a demand led approach.
- Does not achieve the duty to "conserve and enhance".
- Costings of proposals inadequate.
- Unhappiness with reservoir proposal.

The remainder were neutral.

Q4: Should NRA seek to increase the reliability of supply to irrigators (and who should pay ?)

44% said that NRA should seek to increase supply reliability, and 30% said no. However, of those who expressed the view as to who should pay, 93% stated that if the NRA were to increase reliability, then the beneficiary should pay.

Protecting and Improving the Water Environment

Q5: Should the water environment be protected at any price or should the most important sites be afforded the greatest protection and the least important less protection ? If the latter, then what criteria should be used to decide importance?

9% said 'at any price'.
47% said protection should be related to the importance of the site.
11% said that the environment should be protected at the highest sustainable level, within 'reasonable' cost.

19% stated that English Nature and other conservation bodies such as the Wildlife Trusts should determine the criteria used for deciding importance.

Q6: Is some-reduction in 'run of the mill' river flows acceptable, in exchange for improved minimum flows guaranteed by river support pumping ?

55% said yes.

Many of those who said yes added the caveat "...provided there are no detrimental effects."

14% said no.

Reasons included:-

Should be used in emergency, and not as policy.

'Adequate' flows should be guaranteed.

Concern over concept.

Emphasis should be on reducing water lost to sea.

Q7: Is the attention paid to alleviating low flow problems due to excessive abstractions too high, about right or too low ?

3% said 'too high'.

33% said 'about right'.

31% said 'too low'.

33% said no comment or that each case should be treated on its merits.

Q8: Can the construction of reservoirs achieve a net environmental gain ?

56% said yes.

9% said no.

14% said that each case should be judged on its merits.

General Issues

Q9: How should development planning take account of water needs ?

41% said that Local Authorities should treat water issues as primary considerations.
19% suggested that development should be constrained if water resources is a limiting factor.

8% said that integration of the consultation procedure is required into statute law.

6% said that Structure Plans should allow for enhancement of the water supply infrastructure.

Q10: In what other ways could we manage the Region's water resources better for the benefit of us all ?

Comments have been incorporated into Appendix III.

APPENDIX III: OTHER COMMENTS RECEIVED

This section analyses other written and verbal comments including those under Question 10 of the questionnaire relating to 'any other comments'.

Abstraction Licensing

Many suggestions and comments were received under this section; in summary:-

- * Three comments suggesting that closer liaison is required regarding 'slacker' abstractions/ or that 'slacker' abstractions should be licensed.
- * Ten comments requesting review/ revocation of licences of right.
- * Five comments welcoming the examination of tradeable licences.
- * A call from a conservation body suggesting that they should have more say in licence determination.
- * Two comments welcome the investigation of incentive charging, one comment expresses concern.

Canal Transfers

One comment expressed concern over the environmental consequences of using canals for inter-regional transfers, another stated that the Trent/canal option should be pursued, and another stated that the NRA should express their views on canal transfers.

Demands

Several technical queries regarding our demand forecast techniques. Several concerns from various quarters regarding likely impacts if predicted component trends are realised.

Desalination

Six comments suggesting the investigation of desalination as a strategic option.

Development Planning

Six comments suggested that development should be constrained if water resources are limiting and/or the NRA should play a more proactive role in the development planning process.

Domestic Metering

General support exists for implementation of domestic metering in selective areas. However, many comments express the need for care over the charging system adopted and its social effects.

Drainage

Two comments concerned with the impact of land drainage on low flows and wetland water levels. However, a conservation body commented that the "opportunities of land drainage should also be considered."

Effluent Re-use

Three comments support effluent re-use proposals subject to proper consideration of quality, whereas five comments express concern over possible effects on drinking water quality.

Environmental Levels of Service

Three comments from conservation bodies suggested that environmental levels of service should be determined.

Existing Water Resources

Most responses received under this heading were technical comments or queries relating to methodologies of assessment and existing water resource development and management. Some concern exists over some existing local levels of licensed abstraction, and licensed exports from the Anglian Region. There is some confusion over the 'sustainable' management of our resources, particularly from Local Authorities.

Inter-basin Transfers

Eleven comments directly were concerned with the effects on water quality and water resources of both recipient and donor catchments.
Four comments requesting examination of the effects on recreation and navigation.

Irrigation

Widespread support exists for promotion of winter storage reservoirs for summer spray irrigation; and for increased care and efficiency in the use of irrigation. Some concern exists over the requirement from supermarkets for crops which need irrigation to meet quality specifications. There are calls for research into crops with lower irrigation requirements.

Leakage Control

Seven requests for a tight leakage reduction programme with the setting of targets.

Minimum Residual Flows (MRF's)

The NRA was commended for listing MRF's for the region's rivers. General concern exists over possible environmental effects arising from potential reductions in MRF's at Offord and Denver in particular. Main concerns relate to increased siltation leading to navigational problems, and saline incursion leading to water quality and ecological problems.

New Resource Development - Proposed Reservoir

General recognition of the need for a reservoir, provided that it does not fuel demand. Large benefits and disbenefits of reservoir construction have been acknowledged (the latter mainly by conservation bodies and residents in the Great Bradley area.) Many technical queries have been received investigating why a reservoir is required in the package of options. Management for multiple use would be welcomed by many interests.

New Resource Development - Further Use of Groundwater

- * Seven comments expressed unease over groundwater development proposals.
- * Two comments rejected the proposals outright.
- * Two comments stated that abstractions should not occur at the expense of wetlands.
- * One comment suggested that further research was required.
- * One comment suggested that a reservoir would be preferable to groundwater development.

Other Strategic Options

Several 'other' options were suggested, including artificial recharge, flood storage, use of soakaways, sand and gravel pits as reservoirs and use of buffer strips. The decision not to include a Wash storage option has been commended.

River Support

There is some concern as to whether river support by pumping from underground should be used just to ameliorate the effects of abstraction on low river flows, or whether it should be used for environmental improvement.

One comment suggests that more research is required into supplementing the resources of the Middle Level Fens.

Water Grid

Nine calls for a feasibility study into a National Grid. (See Inter-basin transfers).

Wetlands

- * Eleven comments indicating that the Sheffield University list of wetlands (Table 10) is incomplete, and/or that the wetlands section requires strengthening.
- * Five comments stressing the importance of the wetland environment, and the requirement for a precautionary approach.

Wise Use of Water

Twenty comments have stated that more is required from the NRA to promote the wise use of water by education and/ or publicity. However, only eight have provided suggestions; these are listed below:-

- * Four comments suggesting NRA endorsement of efficient appliances.
- * Free tap re-washing from water companies.
- * Dual supply systems.
- * Bathwater used to flush W.C.'s
- * Re-structuring of abstraction charges as an incentive for wise use.

One Local Authority suggested that the scope for improving demand management is limited, but programmes should still continue.

Miscellaneous

Many miscellaneous comments were received, in summary:-

- * Six comments suggest that 'human demands versus environmental demands' is the wrong approach, because the two are synonymous.
- * Several calls for the sustainable management of water resources, but no clear definition of 'sustainable'.
- * A water company feels that environmental needs should be scrutinised in the same manner as Water Company needs.
- * Three comments suggesting a lack of ecological perspective, and that the environment has been given too low a priority.