ENVIRONMENT AGENCY

Managing Water Abstraction: Towards a Shared Strategy

Consultation Response

January 2001

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EXECUTIVE SUMMARY

Following the publication of *Taking Water Responsibly: Government decisions following consultation on changes to the water abstraction licensing system in England and Wales* in March 1999, the Environment Agency has been developing its proposals for strategies for the sustainable management of water resources at a catchment level. These strategies are known as Catchment Abstraction Management Strategies (CAMS). CAMS will provide a more consistent and structured approach to water resources management and an opportunity for interested parties to contribute to their development.

In April 2000, the Agency published a consultation document, *Managing Water Abstraction: Towards A Shared Strategy*, containing its proposals for the process of developing CAMS. We received a large number of responses to the consultation from a wide range of sectors. These included local government and other statutory bodies, water companies, hydropower, agriculture, industry, fisheries, recreation, navigation, environmental groups and members of the public.

A wide range of differing views was expressed. Many supported the proposals with some offering suggestions of possible improvements. Some raised concerns about elements of the proposals or highlighted aspects that they considered had been missed. This document summarises the responses received and forms our initial response to issues raised in the consultation. The Agency is now considering the views and suggestions put forward as we develop the CAMS process further.

A national document, *Managing Water Abstraction: The CAMS Process*, will be produced which sets out the policy and framework underpinning all CAMS and will explain how CAMS will be implemented locally. Elements of the process that are still under development will be detailed in this document. We intend to publish this document in April 2001.

INTRODUCTION

In April 2000, the Environment Agency launched *Managing Water Abstraction: Towards a Shared Strategy*, a consultation document on its proposals for Catchment Abstraction Management Strategies (CAMS). This consultation formed a crucial stage in the development of the CAMS process.

CAMS will provide a more consistent and structured approach to water resources management and an opportunity for interested parties to contribute to their development. Our vision for CAMS is "a shared strategy for the sustainable management of water resources within a catchment".

We distributed around 3,500 copies of the consultation pack and received 194 responses. We appreciate the time and thought given by respondents and value their ideas and suggestions. Breakdowns of the responses by Environment Agency Region and by sector are shown in Figures 1 and 2.

Managing Water Abstraction: Towards a Shared Strategy highlighted issues that had arisen in the development of the CAMS process. The responses to the consultation have aided our development of the process and significant progress has been made. Resolution of many of the issues will prove challenging, and we anticipate a continuing evolution of the CAMS process as our expertise and knowledge increase.

This document forms our initial response to issues raised during the consultation exercise. We intend to launch CAMS in April 2001 with a further document, *Managing Water Abstraction: The CAMS Process*. This will set out the policy and framework underpinning all CAMS and will explain how CAMS will be implemented locally.

Figure 1: Responses by Environment Agency Region

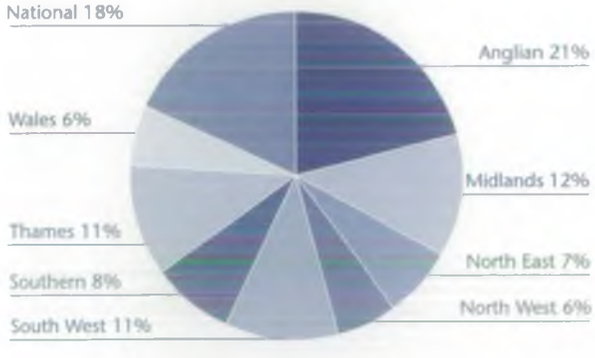
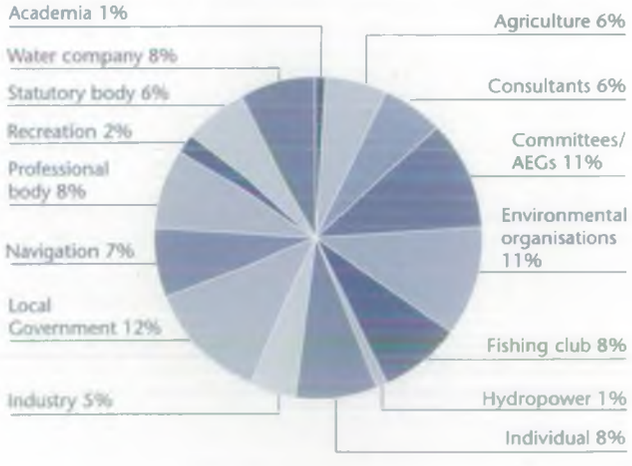


Figure 2: Responses by sector



In general, the concept of CAMS was widely welcomed and respondents were positive about many of the proposals included in the consultation document. In this document, we have summarised the range of responses that we received on each issue. We have not been able to present every facet of every argument but we have considered each response in detail in preparing this document. We hope that the document provides respondents and others with a good understanding of the range of views that were expressed.

We have structured this document in a similar manner to the original consultation document, but have grouped or split sections where this aids clarity. We have also provided an Agency response on the issues in light of the views of external parties. In some cases further thought is needed before we can come to a clear view. These areas will be dealt with more fully in *Managing Water Abstraction: The CAMS Process*.

This document does not refer to regional issues that were raised in some responses. However, our Regions have access to all responses and these will be available to support the implementation of CAMS.

In addition, information received as a result of the recent Water Resources Strategies consultation is being considered as we develop the CAMS process. This information will also be available to them in the future as CAMS are developed at a local level. This approach will contribute to more integrated management of water resources at local, regional and national levels.

CATCHMENT ABSTRACTION MANAGEMENT STRATEGIES: ISSUES AND RESPONSES

Links to other initiatives (5.1)

There were no specific questions for this section but many respondents commented that there must be clear links between CAMS and related initiatives, both internal and external.

The consultation document referred specifically to Local Environment Agency Plans (LEAPs) and Water Resources Strategies.

Many respondents felt that the relationship between CAMS and LEAPs needed to be clearly defined. There was emphasis on minimising duplication of effort and avoiding confusion among stakeholders.

Similar emphasis was placed on the links between CAMS and the Water Resources Strategies. Many respondents commented on the need for greater clarity on how they fit together.

With respect to other initiatives, respondents were again looking for greater clarity on the links with CAMS. These initiatives included Biodiversity Action Plans (BAPs) and non-statutory wildlife sites, Water Level Management Plans, water company Water Resource Plans and Drought Plans, the Asset Management Planning (AMP) process, the EU Habitats and Water Framework Directives, and local development plans.

There were several important factors that respondents felt had been omitted. For example, respondents noted that there was no reference to climate change in the CAMS Framework. Some questioned how CAMS would deal with competition in the water industry and proposed trading of licences.

Agency response

- There is a need for clearer explanation of the links, both internal and external, between CAMS and other initiatives that interact with them. Further detail will be provided in *Managing Water Abstraction: The CAMS Process.* In developing each strategy we will need to consider any plans relevant to CAMS.
- The uncertainty facing the management of water resources arising from the effects of climate change is a key reason for the development of CAMS. However, the national and regional Water Resources Strategies cover a larger area, making them the primary tool for considering the potential effects on water availability and demand. CAMS will need to take account of relevant Regional Water Resources Strategies and identify necessary actions for maintaining sustainable management.

CAMS structure (5.2)

We proposed that CAMS would involve documents at a national and local level.

Nationally there would be:

- *The CAMS Framework setting out the structure and content for a CAMS*
- *The national supporting document presenting the supporting legislative framework, national policy and guidelines within which CAMS will operate,*

and for each CAMS area:

- *A CAMS consultation document*
- *A Catchment Abstraction Management Strategy*
- *A Technical Document containing the supporting detailed information on which the Strategy is based.*

We also proposed that CAMS would be set out on a catchment basis and would examine resource balance and sustainability status, provide guidance on the assessment of new licence applications and set out the future licensing strategy for the catchment including any changes to existing licences.

Can the relationship between the national supporting document, the CAMS and the Technical Document be made clearer? If so, how? (5.2a)

Most of those who responded to this question believed that the relationships between the documents were clear. Some respondents thought their different roles in the CAMS process needed more definition. They also provided valuable suggestions of ways to simplify the structure and provide cross-referencing.

Some respondents felt that the number of different documents making up CAMS could be rather unwieldy.

Agency response

- The Agency now intends to produce one national CAMS document, *Managing Water Abstraction: The CAMS Process*. This will present the supporting legislative framework, national policy and guidelines within which CAMS will operate. There will be no separate CAMS Framework document, as *Managing Water Abstraction: The CAMS Process* will also incorporate information on the structure and content of local CAMS documents.
- The CAMS documents will be as follows: the national document, *Managing Water Abstraction: The CAMS Process*, and for each catchment, a Catchment Abstraction Management Strategy, and a Technical Document. Implicit in these arrangements is that the Catchment Abstraction Management Strategy will be preceded by a CAMS consultation document.
- The documents' relative roles will be clearly defined and cross-referencing will be used where appropriate in order to minimise duplication. Ideas suggested by respondents will be incorporated.

Does the CAMS Framework provide the information you need? Are there any areas not covered? (5.2b)

Respondents generally felt that the information provided in CAMS documents, illustrated in the CAMS Framework, was not sufficiently detailed and did not include enough information to enable informed views to be taken.

Some highlighted specific issues that they felt had been missed but which they considered were essential elements of CAMS. These included navigation, recreation, amenity, drainage and water transfers, archaeology, water quality information and non-statutory wildlife sites. There were suggestions of additions to the maps in the CAMS Framework, for example, major towns, roads, and sites that have been given over to wetland creation.

Some respondents felt that there should be greater clarification on certain elements of CAMS and definitions of terms and concepts used. For example, several respondents felt that the boundaries of CAMS areas and water resource management units should be defined and justified.

Agency response

- The detailed information to support CAMS will be held in the Technical Document. The CAMS itself is intended to be a concise and readable document.
- Most of the aspects which respondents felt had been missed (e.g. navigation, recreation) were inherent in the CAMS Framework. This should have been more explicit and we will ensure that CAMS refers to all relevant factors.

Can the CAMS Framework be structured in a more helpful and understandable way? If so, how? (5.2c)

Respondents were positive about the proposed structure of the CAMS Framework, as a template for Catchment Abstraction Management Strategies. It was accepted that this structure is suitable for use in the first CAMS produced, with some acknowledgement that there will inevitably be improvements with experience.

Respondents were complimentary about the use of visual aids and the language used. Some respondents suggested minor ways in which they felt the Framework could be improved but, equally, many felt that no alterations were necessary.

Agency response

- The Agency intends to proceed with a structure for CAMS largely based on that proposed in the CAMS Framework. Improvements and additions suggested in the responses will be carefully considered in finalising the structure. The detailed content and presentation of CAMS are being reviewed and views and suggestions from respondents will be taken into account.

What information should there be in the supporting Technical Document? (5.2d)

Appendix A of the Consultation document proposed a list of contents for the Technical Document. Comments on this were generally positive. Some respondents suggested additional aspects which they felt should be included. As with the responses relating to the CAMS Framework, respondents were concerned that certain interests, in particular navigation, recreation and drainage, were not included explicitly.

There was a range of views expressed about the level of detail that is appropriate for the Technical Document. Some respondents felt that the document should contain all the detailed information relevant to the development of the CAMS. Several responses suggested or implied that it should be at a level appropriate for use by engineering consultants.

Many other respondents felt that a "detailed summary" would be more appropriate. They suggested that a balance should be found between providing a sufficient level of detail for well-informed readers and still being a clear and comprehensible reference for non-experts.

There was significant concern from many abstractors, water companies in particular, regarding the inclusion of information relating to individual abstractions. They argued that much of this information is commercially confidential, especially with the introduction of competition in the water industry.

What form should the information take in the Technical Document? (5.2e)

Some respondents felt that the Technical Document should include raw data and suggested ways of providing this.

A large number requested that the information be clear and simple allowing immediate analysis rather than requiring detailed examination. There was general support for summarised data and appropriate diagrammatic representation (charts, graphs, maps) accompanied by source references.

A number of respondents requested that information be provided in electronic form.

How should the information in the Technical Document be made available? (5.2f)

Nearly all respondents requested, many quite strongly, that the Technical Document be available in electronic format, in addition to hard copy. They suggested a variety of electronic media including floppy disk, CD-ROM and the Internet. Some requested that data on the Internet be updated during the six-year life of the CAMS.

There was an acknowledgement from a small number of respondents that extensive use of electronic media has resource implications and may not be possible in the immediate future. However they felt it should be an aspiration for the future.

Some felt that at the perceived level of data inclusion in the Technical Document, it would be difficult to make it widely available and it should therefore be held at Agency offices. Alternative locations such as local authority offices and libraries were also suggested. Others saw the document to be of a more manageable size and felt that it should be circulated to all those who were involved in developing the strategy.

Some suggested that different media should hold different levels of detail, for example, a detailed summary as the hard copy and the detailed data on CD-ROM or the Internet.

Agency response

- We will consider respondents' comments on the content of the Technical Document as it is further developed.
- The Agency intends to provide the supporting technical information for CAMS in two parts. A technical summary will contain tables, graphs and charts summarising the detailed information. We are looking at making this available on the Internet. The detailed information, for example the raw data used in resource calculations, will also be available on request. This will provide a static reference of the data set used to develop the CAMS. The Agency will also be looking at ways to make this information available in electronic format.
- The Agency does not intend to update the information published for a CAMS within the six-year period. The Technical Document is designed to be a permanent record of the information that was used to develop the CAMS. However, subsequent updates to resource availability status may be provided on the Agency's website.
- With respect to the issue of commercial confidentiality, the Agency will continue with its current approach to provision of information based on the Environmental Information Regulations 1992 and other relevant legislation.

CAMS consultation (5.3)

We proposed that the development of CAMS should be done in consultation with interested parties and that the methods of consultation need to be appropriate to the local situation.

What form should the pre-consultation take, and how should interested parties be involved? (5.3a)

The majority of respondents viewed pre-consultation as an opportunity for the Agency to engage interested parties at an early stage in the development of CAMS. This would ensure that the proposals contained in the consultation document have already taken account of external views.

A range of views was expressed on the extent of pre-consultation, that is the number of parties that should be involved. Some took the view that pre-consultation should be as extensive as possible, on a similar scale to the main consultation exercise. Others felt that it should be targeted in some way. Generally, the water industry suggested that it should be consulted initially, in line with the Agency's statutory duty to have particular regard to public water supply. Some other abstractors felt that they should be consulted on their water needs. Others felt that all the key interested parties (abstractors, environmental groups and other water users) should be involved.

Some respondents suggested that pre-consultation should take place through established channels such as the Agency's local Area Environment Groups (AEGs), statutory committees and liaison group meetings with water companies and other major abstractors.

There were a variety of suggestions on the mechanism for pre-consultation. Some respondents felt that it should consist of the initial circulation of a draft CAMS consultation document, with the invitation to comment. Others suggested alternative mechanisms such as focus groups, meetings, presentations, questionnaires and invitation to make written representation.

Some felt that the pre-consultation phase is the mechanism for raising awareness of the development of the CAMS and the ensuing consultation exercise, rather than to get an initial idea of external views. They felt awareness raising would need to include clear indications of the timetable and the opportunities for people to be involved.

How extensive should the consultation on CAMS be? (5.3b)

Most respondents felt that the consultation should be as extensive as possible. Some suggested that there should be some demonstration of interest in order to be included but generally the feeling was that no one with a genuine interest in water resources should be excluded from the consultation.

There were concerns expressed that, if too extensive, the consultation process could be unmanageable and impractical and could cause delays in implementation.

Some respondents highlighted that key stakeholders are not always based in the catchment. For this reason they felt that consultation should incorporate not only local people and interest groups but also national organisations and professional bodies. They suggested that these bodies could then be responsible for publicising and consulting on the CAMS among their members.

Some respondents felt that local knowledge, provided by people such as fishermen, farmers, long-time residents and naturalists, is important and should be evaluated to support technical assessment, in particular where there is limited data. They felt that the consultation process should engage this type of interest.

In responding, would you like the opportunity of a public meeting, or is responding in writing or by the Internet adequate? (5.3c)

The respondents were divided on this question. Some believed that public meetings are an essential component of the consultation process. These meetings have the advantage of being "open" and allowing all interested groups to publicise their case. They also provide flexibility in the consultation process; some respondents see meetings as an alternative for people who would rather not express their views in writing.

Conversely, many respondents questioned the effectiveness of public meetings. Concerns included the potential for them to be emotive, confrontational and biased towards vocal minorities. Others felt that they are time-consuming and sometimes poorly attended. Some suggested alternative mechanisms such as individual meetings with abstractors and other interest groups/sectors, in addition to the opportunity to respond in writing or by the Internet. Others felt that written/Internet responses alone would be sufficient.

The majority of respondents suggested that a public meeting should not be ruled out but should be dependent on the extent of issues in the CAMS area, the level of interest in them and the likelihood of significant variations to existing abstraction rights. It was suggested that a public meeting should be held for all CAMS during the first six-year cycle but that in subsequent cycles they should be used only if necessary.

Agency response

- The Agency is developing the consultation process for CAMS and will take the views expressed into account. Details of the CAMS consultation process will be provided in *Managing Water Abstraction: The CAMS Process.*
- We are also conducting a wider review of our approach on public participation, the results of which will feed into the CAMS consultation process in due course.
- Consultation on CAMS will include a pre-consultation stage. This will ensure that the Agency is aware of all essential elements in the development of CAMS. We have carefully considered the responses and have come to the view that pre-consultation should, as far as possible, be focussed on the Agency's existing arrangements for external involvement through its Area Environment Groups. These are non-statutory groups of external representatives set up to provide a link between the Area and the local community and those it regulates. Additional expertise may need to be co-opted depending on the issues involved.
- We intend to be flexible in our approach to consultation, to ensure that the scale and mechanism are appropriate for each catchment.
- We recognise the value of local knowledge of a catchment and will aim to involve all relevant parties in the development of CAMS.
- We intend to use public meetings where appropriate. We are giving further consideration to the role of public meetings and identifying the situations in which they would be useful.
- The Agency will consult national organisations through their local/regional offices. This will allow them to disseminate information on CAMS to their members.

Data and information requirements (5.4)

In the consultation document, we proposed to make data more widely available by using the Internet. We also proposed that a CAMS would be a stable document, updated within the six-year cycle only if there are major, unanticipated changes.

What data do you expect to be available, how should it be presented, and where should it be located? (5.4a)

This question was closely linked to questions 5.2d–f on the Technical Document and the responses received were therefore similar.

Many respondents highlighted the need for the Agency to make available the raw data used in the assessment of resources. They also felt that the data should be supported by clear explanations and definitions.

As in the responses to question 5.2f, the common view was that supporting data should be available in electronic form, preferably on the Internet, as well as on hard copy.

Agency response

- All data and information used in the development of CAMS will be available on request. The Agency will be reviewing ways to provide it in electronic format.

Do you agree with the update proposals? If not, what is an appropriate update frequency? (5.4b)

Generally, respondents supported the proposals that CAMS be produced on a six-yearly cycle. Some questioned the choice of six years, as opposed to five, which is currently the update frequency of LEAPs, Water Resources Strategies and the Asset Management Planning (AMP) process.

Broadly, abstractors felt that a six-yearly update is too frequent. They suggested that CAMS should be produced less frequently, possibly with minor reviews every six years. Some respondents believe that the review period should be flexible and responsive to the particular locality and changing circumstances. A "risk-based" approach was

suggested whereby a stressed catchment would be reviewed more regularly than an unstressed one.

Regarding the proposal that CAMS should only be updated more frequently when there is a "major, unanticipated change", most respondents thought this was reasonable. However, they felt that it is important to define how we classify such a change. Some were also concerned about the potential cumulative effect of many small changes.

Agency response

- The proposal that CAMS should be on a six-year cycle was introduced by the Government in *Taking Water Responsibly*. The choice of six years ties in with the update cycle in the EU Water Framework Directive. For this reason, the Agency intends to proceed with this proposal.
- We are not planning to use a risk-based approach in relation to the update of CAMS but the intention to conduct a review when there is a major, unanticipated change in the catchment is a reflection of increased risk. Where there is such a change this will be approached in a consistent way.
- We recognise the cumulative effect of many small changes, but this is unlikely to be on a scale which will require a review of the CAMS within the six-year period.

Resource assessment and management (5.5)

We proposed that we would move to a consistent framework of resource assessment techniques. We also proposed to research the interactions between water levels, flow regimes and aquatic plants and animals to help us protect the environment in future.

Does the resource balance in section 4 of the CAMS Framework give the information that you need? (5.5a)

Most respondents supported the objective of a consistent approach to resource assessment. However, some stressed the need for flexibility to take account of the catchment's individual nature, for example, geology, topography and land use. Some concern was raised that the process did not reflect the uncertainties involved in water resource assessment.

Some respondents were satisfied that the CAMS Framework presented the subject of resource balance adequately. Many, however, expressed reservations and insisted that it needed clearer definition and explanation. Others supported the concept of resource balance but felt that it was inadequately covered in the document, given its importance.

The robustness of the methods used for calculating the resource balance was questioned. Two specific issues were raised. Firstly, all the various components of the resource balance assessment, including transfers, treated effluent, and new input, must be taken into account. Some questioned how the operation of large impounding reservoirs would be handled. Secondly, respondents highlighted the need to recognise variability in water resources seasonally and from year to year, and the associated fluctuations in water demand.

Several respondents raised questions about the definition of key elements of the water resource balance; in particular "total resource" and "available resource".

Are there other methods of presentation that you would prefer? (5.5b)

Many respondents were positive about the presentation of the resource balance. Others suggested additional methods of representation.

Some respondents felt that the presentation did not reflect the complexities of water resource systems and did not provide all the information required. Some requested that the source and reliability of the information be included.

Agency response

- There are significant complexities and uncertainties involved in resource assessment. We are working on the development of a consistent framework methodology for use in the CAMS process.
- The development of the framework will ensure that all the components of a resource balance are considered. The resultant methodology will need to be robust. Flows do change throughout the year, and the issue of preserving flow variability together with the impact this has on the available resource will also be considered as we develop the framework.
- The amount and presentation of information on the resource balance in the CAMS documents will be considered as we develop the framework. We will take account of the comments of respondents in finalising this part of the process.

Should the environmental allocation used for the catchment or water resource management unit be consulted on as part of the consultation process for CAMS? (5.5c)

The environmental allocation was one of the most widely discussed topics of this consultation. Many respondents acknowledged the importance and complexity of the subject. Some expressed concern about the infancy of the science involved. Given the uncertainties involved there is much need for further research, particularly into the flow requirements of river ecology.

A fundamental theme addressed by some respondents concerns the way in which the Agency views the environmental allocation. While most respondents understood that the Agency has a duty to meet statutory objectives and legislation, many of the aspects of environmental allocation were regarded by some abstractors as a luxury that should be costed against, for example, reliability of public supply.

Some respondents commented on the assumed default use of Q_{95} as the environmental allocation. Some accepted that ecological requirements in terms of flow for key species are poorly understood but felt strongly that the use of Q_{95} was no longer adequate. In addition to the ecological requirement, respondents recognised the other key component of "environmental allocation", the requirements of other water users in a catchment; for example, recreation and amenity. It was suggested that the Agency needs to establish the impacts of flow ranges on these other uses of water. Again Q_{95} might not be adequate for this and there is likely to be a seasonal aspect to these requirements.

Another key issue raised by some respondents was whether flow objectives are adequate to protect environmental features dependent on groundwater. Groundwater levels and surface water levels in wetland sites are not necessarily protected by maintaining river flows.

In light of the above issues the overwhelming view of respondents was that the CAMS process should involve consultation on the environmental allocation. It is essential that the Agency is fully aware of the issues affecting stakeholders and equally important that stakeholders understand how and why the allocation has been defined. However, opinions on the extent of consultation varied.

Some felt that environmental allocation should be fully consulted upon. Others felt that the Agency is best placed to make an assessment of environmental allocation and that, in view of the complexity of the subject, there was room for only very limited consultation.

Agency response

- The relationship between flow and river ecology is the subject of much research, both within the Agency and by external organisations. We are reviewing methods of setting the environmental requirements of different habitats as part of the development of the framework for resource assessment. In addition to this, water is used for other purposes such as amenity and recreation which, together with the environmental requirements, result in the total "in-river needs".
- As part of the development of the framework, the Agency is seeking to integrate groundwater and surface water management more closely. The use and applicability of control measures other than surface water flow restrictions is also under review.
- We intend to involve stakeholders in the identification of in-river needs. This will be at the pre-consultation stage and will ensure that all relevant water-dependent requirements are identified. The Agency will then use the resource assessment methodology to determine the in-river needs.

Sustainability status of water resource management units (5.6)

We proposed to use sustainability status criteria to show the relative balance between committed and available resources.

Does the concept of sustainability status help you understand how we manage water resources? (5.6a)

Generally, there was wide support from respondents for the concept of sustainability status. However, there was some concern expressed that the term "sustainability status" was not appropriate and could be misunderstood. Several respondents suggested clearer terms for this concept of an indicator of the degree of water resource commitment.

There was concern expressed by abstractors that the concept of sustainability status does not reflect the broader framework of sustainable development. These respondents felt that sustainable management of water resources should include the consideration of economic and social factors as well as the environment.

Several respondents were concerned that the concept of sustainability status does not allow for the dynamic nature of the water environment, as total resource and environmental needs can vary both in space and in time. Respondents representing both abstraction and environmental interests questioned how these uncertainties would be handled.

There was a strong feeling from many respondents that sustainability status needs to be based on a consistent and agreed methodology.

Agency response

- We now intend that "sustainability status" will be referred to as "resource availability status". We will continue to develop the methodology on which to base the categorisation.
- The "resource availability status" is based on the environmental element of sustainability. It will feed into a sustainability appraisal for each unit, which will also take account of the wider concept of sustainable development, that is, social, economic and resource use factors.
- The resource balance in a catchment may vary in space and time and we will consider this as we further develop the "resource availability status" classification, as part of the wider framework for resource assessment and management.

Could we improve our approach to defining sustainability status or its presentation? If so, how? (5.6b)

Various organisations requested that more detail be presented on the methods used to determine sustainability status and the associated uncertainties. Some respondents suggested ways we could improve the presentation of sustainability status.

There was some concern expressed that the colour-coded categories for sustainability status

could cause confusion with the EU Water Framework Directive categories. It was also suggested that the sustainability status categories should be redefined to include criteria comparable with those in the Water Framework Directive.

Respondents, particularly those representing environmental interests, questioned whether the distinction between "over-licensed" and "over-abstracted" categories was appropriate. They felt that the Agency has limited powers to prevent increased uptake of licences and the move from "over-licensed" to "over-abstracted" could therefore potentially happen rapidly.

Agency response

- The comments made by respondents on the presentation of "resource availability status" will be taken into account as we further develop the classification system.
- The concerns expressed on using a colour-coded categorisation and the potential confusion with other initiatives have been recognised. These comments will be considered as the concept is developed further.
- The detail of the categories is still being considered, including the appropriate number of categories. We consider that there may be benefits in retaining the distinction between "over-licensed" and "over-abstracted" but this will be reviewed as part of the final development of the classification system. The latter represents abstraction that is already unsustainable whereas the former represents the potential for damage should the full licensed amount be abstracted. This categorisation helps to distinguish the type of resource recovery measures and the degree of urgency required.

Future strategy for resource recovery (5.7)

We proposed that we detail and consult on feasible options for resource recovery to bring about a more sustainable abstraction regime. This will include the consideration of costs and benefits.

Should the Agency state its preferred option for resource recovery? (5.7a)

There was general agreement among respondents that it would be helpful for the Agency to present a series of feasible options for resource recovery and that these options should be consulted on within the CAMS process. The majority of respondents felt that we should state our preferred option or options, supported by a clear justification.

Opinions varied on how these options should be developed and specifically on the appropriate stage that interested parties should become involved. Some respondents suggested that the Agency should develop the options before public consultation, whereas others felt that it is important to involve interested parties from the early stages of option development. There was a strong feeling from abstractors that they are in the best position to contribute information on costs of resource recovery to the development of options.

There was some concern expressed that the development of options should take account of economic and social factors. There was also a concern that consultation on these options must be genuine.

Specifically on the issue of resource recovery, several respondents expressed concern that revocation of licences should not be the only method used for reducing abstraction. It was stated that, where possible, improvements in efficiency, infrastructure and voluntary agreements should be pursued as a preference.

Agency response

- The Agency will generally present a range of options and state its preferred option or options for resource recovery, in the CAMS consultation document.
- As part of the involvement in the preparation of each strategy, there will be an opportunity for interested parties to contribute to the development of resource recovery options. Details will be given in *Managing Water Abstraction: The CAMS Process*.
- It is our intention that the options for resource recovery should be developed using a sustainability appraisal process that is currently under development. This process takes account of environmental, economic, social and resource use factors.
- It is important that we consider options to achieve a sustainable abstraction regime in water resource management units that are "over-abstracted". The revocation of active licences would only be pursued where it has not been possible to secure a reduction in abstraction through options such as improvements in efficiency, waste minimisation measures or other voluntary agreements.

How should information on licences that need to be varied or revoked be given? (5.7b)

Two main views on this issue were expressed in the responses. Some of the respondents felt that information on licences that need to be varied or revoked should be fully in the public domain. Some suggested that it could be included in the local CAMS documents. Others suggested the use of local and national press to make this information available, in the same way that licence applications are advertised.

In contrast, a number of respondents had significant concerns about making this information publicly available. They felt that this information may be commercially confidential and, therefore, a matter for negotiation between the Agency and the licence holder only.

Many were of the opinion that this information could be released into the public domain but only after it had been discussed with the licence holder and an approach agreed.

Agency response

- The Data Protection Act 1998 has important implications for the provision of information. We are examining this in more detail, together with concerns raised by respondents, in formulating our approach.
- We do not intend that a publicly available document would be the means by which licence holders would learn about any potential changes to their licences.

Do you have any views on how costs and benefits should be assessed in the CAMS process? (5.7c)

In the production of CAMS the Agency needs to fulfil its duty to take account of costs and benefits. There is general agreement from respondents that taking account of this duty is challenging and could lead to controversy. It was clear that the term "costs and benefits" can be interpreted in a number of different ways and responses therefore covered a wide variety of issues.

Two strong opinions were echoed throughout the responses. Those broadly representing environmental interests expressed concern that "non-use" benefits are not sufficiently valued in cost-benefit appraisal. Abstractors, in particular water companies, felt that costs must be rigorously justified and that social factors must also be taken into consideration.

There were suggestions from several respondents of methods to apply in the development of CAMS. Many respondents called for a consistent method to be adopted and, in some cases, the involvement of interested parties in the development of such a method was requested. There was general support for the idea that the analysis should include evaluation of environmental, social, economic and resource values and benefits.

Agency response

- The concerns of respondents have been considered and a process is currently under development to have regard to costs and benefits in the production of CAMS. This process is a sustainability appraisal that covers the Government's four objectives of sustainable development (relating to environment, economics, society and resource use).
- A review of the draft sustainability appraisal process by external parties representing the key stakeholders in water management issues was undertaken in January 2001.

IMPLEMENTATION OF TIME LIMITS: ISSUES AND RESPONSES

Introduction (6.1)

In the consultation document we proposed that all new abstraction licences would be issued on a time-limited basis with a presumption of renewal where licence holders can satisfy the Agency that three tests are met. These tests are detailed in Renewal Arrangements (6.3).

The majority of respondents supported the introduction of time-limited licences. Many cited the increasing evidence of climate change and the long-term uncertainty this causes as a reason for adopting a precautionary principle and using time limits as a mechanism for reviewing licences.

Conversely, some abstractors questioned the value of time limits, given that the Agency already has the power to review abstraction licences.

There was concern about the potential effect that time-limiting of licences could have on the introduction of trading in abstraction licences. It was felt that short time limits could reduce the potential trading value of a licence.

Agency response

- Time limits are an effective tool for managing water resources and provide a means for the Agency to deal with environmental uncertainty, changing needs for water and for ensuring efficient use. The Agency supports the Government's confirmation, set out in *Taking Water Responsibly*, that all new abstraction licences should be time-limited. Details of the Agency's policy on time-limiting will be included in *Managing Water Abstraction: The CAMS Process.*
- The Government is still considering its approach to trading in abstraction licences. The Agency will take account of Government proposals in this area when they are known.

Variation of licences (6.2)

The Agency proposed that, except in cases of a reduction in volume or other similar minor change, a time limit will be introduced to the entire licence subject to a variation.

Overall the respondents supported this proposal. Some highlighted the need for clear definition of the phrase "other similar minor change".

Some respondents expressed the view that applying time limits to historic licences of right should only be carried out with suitable compensation.

It was also suggested that, in order to avoid a licence becoming time-limited, some abstractors would simply not seek to vary a licence, potentially constraining their ability to increase production.

Agency response

- The Agency has powers to impose conditions on the entire licence when a licence holder applies for a variation. Applying a time limit to a whole licence is an extension of this approach. This will contribute to meeting the Government's aspiration for gradual conversion of permanent licences to time-limited status. The Agency therefore intends to proceed with this proposal. Applicants will be made fully aware of proposed conditions before a final decision is made.
- We recognise the need for clear guidance on what is a "similar minor change". Applications in this category would generally be those that will have no impact on the environment.

Renewal arrangements (6.3)

The Agency proposed that time-limited licences will carry a presumption of renewal where licence holders can satisfy the Agency that all of the following three tests are met:

- *environmental sustainability is not in question*
- *there is continued justification of need*
- *the licence holder can demonstrate that water is being used in an efficient manner.*

Subject to the above tests and satisfying relevant statutory procedures for a licence renewal, the holder of an existing licence would have priority in the allocation of the available resource over a new applicant coming in at the point when the licences are being reviewed.

Where the Agency considers that a licence will not be renewed on the same terms, it will provide six years notice of non-renewal to affected licence holders.

There were no specific questions for this section but views were invited on our proposals for the renewal of time-limited licences as part of the following section.

Normal duration of licences (6.4)

Do you support our proposed approach to renewing time-limited licences? (6.4a)

Overall there was support for the Agency's proposed approach to the renewal of time-limited licences. Key issues of concern related to the detailed interpretation of the three renewal tests. There was particular concern that the degree of justification required to satisfy the three tests was not clearly defined.

A number of respondents viewed the requirement for environmental sustainability as a potential problem. They requested that the Agency defines the term "environmental sustainability" more clearly, and states how it will be measured and the time-scale over which assessments should be made.

Regarding the test for ongoing justification of need, some water company responses pointed out that unused licences (or parts of licences) often constitute an important component of their resource strategy plans. They requested that this be taken into account in the assessment for this test.

The incorporation of a test of efficient use was widely welcomed and several respondents suggested that it should be made stronger by requiring continual improvements in efficiency. Some, generally abstractors, were more cautious about this test and requested that the term "efficient manner" be clarified. Some water company responses highlighted the difficulty of demonstrating efficient use by their customers.

Some respondents were concerned about the evident onus of proof on the licence holder. Several expressed the view that the responsibility for justifying the revocation or reduction of a licence at its review date should lie with the Agency. Some pointed out that the assessment required is impractical and costly, particularly for the holders of small licences.

The majority of respondents supported the Agency's proposals to give existing licences priority over new applicants at the time when resources are reviewed. However, some questioned whether the practice of maintaining this "first come first served" principle would conflict with the Government's aspiration of increasing competition.

The respondents were divided over the provision of six years notice of non-renewal of a licence. Some considered that this is an appropriate period and that the Agency should work with affected licence holders to secure an alternative supply, before the expiry of the original licence. If six years notice was not provided, then abstractors should be able to assume that the licence would be renewed. Conversely, some expressed the view that six years was insufficient notice and did not allow enough time for abstractors to develop and implement alternative arrangements.

Agency response

- The Agency will take responsibility for determining whether environmental sustainability is in question. Demonstration of efficient use of water and continued justification of need will be dependent on information provided by the applicant. The Agency will develop guidance on the interpretation of efficient use and reasonable need.
- Existing legislation requires us to "have particular regard" to the needs of public water supply. Beyond this, no value judgements are made in prioritising different types of water use and any change from the principle of "first come first served" may require a change in legislation. We confirm that we will give renewals of existing licences precedence over new applications. To remove this principle would conflict with our aim to minimise the level of uncertainty for abstractors with the introduction of time limits.
- Where it is clear that a time-limited licence will not be renewed or will be significantly restricted, we will provide the abstractor with six years notice of this decision and will advise abstractors on the identification of alternative supplies.

The Agency proposed that the duration of licences should be linked to the six-year review cycle for CAMS. It would, therefore, normally be necessary to issue licences of between 12 and 18 years.

Time-limited licences would be issued with a common end date applicable to the catchment or sub-catchment in which they occur.

Views are invited on our approach to determining licence time limits. (6.4b)

Although most respondents supported the introduction of time-limited licences, there was no clear consensus on the appropriate duration of licences.

Several respondents supported the proposal to apply time limits of 12 or 18 years and suggested that this should be linked to the resource availability status (formerly referred to as sustainability status) of the catchment.

However, many abstractors were concerned that short time limits would have an impact on the stability of their planning process and long-term commercial viability. They therefore recommended that licences should be granted for significantly longer periods. Several respondents considered that the level of investment should be taken into account in setting the length of time limits and periods of 25 to 30 years and above were suggested in order to achieve this.

Conversely, other respondents considered 12 or 18 years to be too long, particularly in areas where there are problems of over-abstraction. They suggested that five or ten years would be more appropriate.

Views are invited on whether there should be a common licence expiry date linked to the CAMS review and, if so, on how this should be reflected in time limits applied to individual licences. (6.4c)

In general, respondents were in favour of a common expiry date linked to the CAMS review cycle. A common expiry date is seen as the best way of ensuring a level playing field in the allocation of limited resources. Many respondents did recognise that this would result in a significant workload for the Agency associated with renewals and were concerned that this could result in delays for licence holders.

Several respondents suggested that the current process for dealing with applications to renew abstraction licences would need to be simplified. Some detailed suggestions of how this could be achieved were made.

Some respondents noted that new abstraction licences would need to be granted for progressively shorter periods as the common end date approaches and suggested that this could affect investment decisions for some abstractors.

Agency response

- The Agency intends to proceed with the proposal to renew abstraction licences for a normal duration of 12 years.
- Licences will be issued with a common end date based on the CAMS area. The duration of the initial licence will depend on the timing of the application relative to the cycle; that is, licences will be granted with increasingly shorter time limits as the common end date approaches. However this shorter time limit will only apply for this initial period.
  On renewal, the licence would be reissued for the full 12 years. It is our intention that common end dates for each CAMS area will be published in *Managing Water Abstraction: The CAMS Process.*
- The introduction of time-limited licences will impose additional administrative workload for the Agency. We will plan for this. We are currently reviewing our procedures for dealing with licence renewals to ensure the process is simplified. The draft Water Bill published on 6 November 2000 contains proposals which, if enacted, would aid simplification.

Special circumstances for shorter duration licences (6.5)

The Agency proposed that, in certain circumstances, the Agency would apply a shorter time limit to individual licences, or all licences in a particular area of a catchment.

We also proposed that no minimum time limit would be specified in the final implementation guidance.

The majority of respondents supported the proposal that there should be no minimum time limit specified in the guidance. There was a suggestion that there should be a minimum period of three years.

Various respondents felt that short time limits should not be used simply to defer difficult decisions. Where shorter time limits are imposed, they requested that applicants be given an indication of the likelihood of renewal. Respondents also commented that where shorter time limits are used to reflect uncertainty, the Agency must be explicit about the reasons for this and the information and degree of proof that will be required to support an application to renew the licence.

Agency response

- The Agency intends to proceed with this proposal. No minimum time limit will be specified in the final guidance.
- A minimum period of three years is not considered appropriate as in some circumstances an abstraction may be required for a shorter period. The period of the licence will therefore be a matter for discussion between the applicant and the Agency.
- There are situations where uncertainty over the environmental impact of an abstraction does exist. In these cases a shorter time limit is appropriate while monitoring is undertaken to assess the environmental impact.
- Where a shorter time limit is given, licence holders will be given an indication of the likelihood of renewal.

Special circumstances for longer duration licences (6.6)

Longer duration licences for catchments with no water resources sustainability issues

The Agency proposed that, where a review of resources shows that there are no water resources availability issues and predicted increases in demand for water are minimal, a period of more than 12 years may be appropriate as the normal licence duration for a catchment.

How appropriate is it that the norm for a catchment should be relaxed where there are no current issues relating to water resources sustainability? (6.6a)

Opinion was divided on this issue. Abstractors and those representing them were in favour of relaxation where no water resources sustainability issues exist. They pointed to the reduced administration and the increased certainty of supply as benefits of this approach.

Conversely, those representing environmental interests were opposed to the idea. They were concerned that knowledge of environmental impacts and climate change are advancing at such a pace that sustainability issues may well arise even within normal licence periods. They felt that if the norm were relaxed, this would potentially compromise the Agency's ability to address these issues.

A few respondents commented that the term "relaxation" was not appropriate and suggested "extended" as an alternative.

If the norm for a catchment were relaxed, what period might be appropriate in such catchments? (6.6b)

Respondents who put forward specific suggestions for an extended duration tended to be large volume abstractors, generally from the water industry. Many suggested that the duration should be extended by an additional one or two CAMS cycles. However, a number of respondents suggested significant extension of the norm to durations of the order of 25 to 35 years. Some argued that the licence period should be assessed on a case-by-case basis.

Those respondents who were opposed to the proposal stressed that if the norm for a catchment was extended then licensing proposals must be subject to particularly detailed scrutiny and consultation.

Agency response

- The Agency intends to adopt 12 years as the normal duration for licences in all but exceptional circumstances. The Agency considers that granting extended time limits generally poses an unacceptable risk to environmental sustainability. The presumption of licence renewal together with the commitment through the CAMS process to provide six years notice for non-renewal or significant restriction of a licence should provide considerable reassurance for longer-term planning.

Longer duration licences for exceptional circumstances

The Agency proposed that, in exceptional cases, individual licences could be granted for longer periods than the normal duration for a catchment. This would be subject to the applicant submitting a full business case and satisfying the Agency that the circumstances justified a longer period.

It was proposed that no maximum period would be specified in the final implementation guidance. The exact period of the licence would be a matter of discussion between the applicant and the Agency.

How appropriate is it for no maximum period to be specified in these circumstances in the final guidance? (6.6c)

There was some misinterpretation of this question in that many respondents thought that we were proposing that those licences meeting the criteria would be granted without a time limit. As clarified above, we were proposing that these licences would still be time-limited but with a longer duration.

Abstractors supported the proposal that no maximum period should be specified.

Others believed that a maximum must be set and that the presumption of licence renewal offers sufficient certainty for abstractors.

In its document *Taking Water Responsibly* the Government put forward four criteria which would all need to be met for a licence period longer than the catchment norm to be considered:

- the lifetime of the infrastructure inseparably associated with the desired authorisation will extend over the desired period of validity;
- there will be continued need for the service or product associated with the infrastructure throughout the desired period of validity;
- the fullest possible appraisal of likely changes in environmental and economic circumstances which may have a bearing on the acceptability of the abstraction over the desired period of validity has been carried out and shows no significant concerns; and that
- the infrastructure development contributes to sustainable development.

Some respondents to this consultation made comments on these criteria.

If a maximum period were to be defined for such licences, what period would you consider appropriate? (6.6d)

This question had a mixed response. Some suggested that the period should be linked to the expected lifetime of the works associated with the abstraction, which could be in excess of 50 years.

Conversely, several respondents pointed out that licences should rarely need to be more than 20–25 years as the period of investment return, the main justification for an extended licence duration, is generally of this order. Unless the production of CAMS identified that water resources sustainability issues had arisen since the granting of the licence, the presumption of renewal would mean that licences would continue to be renewed for the lifetime of the works. These respondents also felt that, once the return on investment has been achieved, there is no continued justification of longer licence duration.

Many respondents recognised the value of having a maximum period that is a multiple of six, in order to fit with the CAMS review cycle.

Agency response

- The Agency considers longer duration licences will only be granted in exceptional circumstances. The Agency will consider applications on an individual basis but with a strong presumption against longer duration licences. Each application will be considered on its own merits against the four criteria set out in *Taking Water Responsibly*. In due course the Agency will consider developing guidance on this issue.

Impact of proposed changes in legislation (6.7)

In developing the new legislation, the Government has proposed that there will be a general threshold of 20m³/day below which abstractions will not need to be authorised, irrespective of the purpose for which the water is used. However, the Agency will be given the ability to apply to the Secretary of State to either increase or decrease this threshold in a particular catchment or sub-catchment.

Until the necessary legislation is in place, the Agency proposed that all new licences issued for less than 20m³/day will be subject to a time limit, in accordance with the proposed policy of setting time limits for all new licences.

Although not directly relevant to the proposals outlined above, many respondents reiterated concerns about the Government's proposed deregulation of smaller abstractions (below 20m³/day). Their main concerns related to the cumulative impact of small abstractions as well as logistical issues of catchment management.

Most of the respondents who specifically addressed the proposal to issue new abstraction licences of less than 20m³/day on a time-limited basis suggested that it would be unnecessary if, under the new legislation, deregulation would remove the need for these abstractions to be licensed.

The Government also intends to introduce legislation to control some abstractions that are currently exempt from licensing requirements. These include dewatering operations, abstractions for trickle irrigation, supplies for navigation purposes and land drainage augmentation schemes. Impoundment licences would also be changed to become valid for the life of the works.

The Agency proposed that, when the legislation is introduced, the time limit that would apply to these operations will be determined using the same framework for setting time limits as discussed in the earlier sections of this document.

Agency response

- The Agency will apply a time limit to all applications in accordance with its policy, including those applications under 20m³/day. This will ensure that all licences in catchments where the exemption threshold may be lowered below 20m³/day will be time-limited in accordance with the Agency's policy. There will be no additional administrative impact in adopting this approach. Exemption thresholds may be reduced below 20m³/day where the Agency considers that tighter regulatory control is necessary to protect the environment and other water users.
- We will apply the time-limiting policy to previously exempt activities, subject to the enacting of proposals set out in the draft Water Bill.

Converting existing licences to time-limited status (6.8)

The Agency proposed that, when the legislation is passed, guidance would be produced highlighting the measures that may influence the holders of permanent licences to convert them to time-limited status. In the meantime, we shall encourage abstractors to voluntarily convert in line with the Government's concept of the "responsible abstractor".

What can the Agency do to provide encouragement for voluntary conversion and how it should feature in CAMS? (6.8a)

There were many and varied responses from all sectors on this issue. The majority recognised the difficulty of encouraging voluntary conversion, particularly in the light of Government proposals for licence trading.

Many responses indicated that a combination of policy tools is probably required, ranging from coercive measures such as education and advice, through economic incentives, to regulatory intervention such as enforced licence conversion. Many respondents expressed the view that some form of financial incentive is imperative and some suggestions were made. These included a declining level of compensation according to the length of time taken for conversion to time-limited status, tax breaks or a discounted abstraction charge for time-limited licences compared with permanent licences. A number of organisations suggested that positive publicity of environmental credentials could be an incentive for conversion to time-limited status.

Encouragement is likely to be provided by reassurance that conversion should not otherwise materially affect the licence. A simplification of the renewal process is also likely to reduce reluctance to convert.

Agency response

- The draft Water Bill contains proposals which, if enacted, may influence licence holders' approach to voluntary conversion. The Agency intends to produce guidance on the issue of conversion once the proposed Water Bill has been implemented. The comments and suggestions received in this consultation will be considered in developing this guidance.

APPENDIX A: LIST OF RESPONDENTS

Action for the River Kennet

AEG[1] – Cornwall Area, South West Region

AEG – Dales Area, North East Region

AEG – Essex Area, Anglian Region

AEG – Lincolnshire and Welland and Nene Areas, Anglian Region

AEG – Lower Severn Area, Midlands Region

AEG – Lower Trent Area, Midlands Region

AEG – Norfolk and Suffolk Area, Anglian Region

AEG – North Area, North West Region

AEG – North Wessex Area, South West Region

AEG – South Wessex Area, South West Region

AEG – South West Wales, EA Wales

AEG – Upper Severn Area, Midlands Region

AEG – Upper Trent Area, Midlands Region

Aggregate Industries

Amey, G

Anglian Water Services Ltd

Association of Building Engineers

Association of Drainage Authorities

Atlantic Salmon Trust

Axe Fly Fishers

Axe Vale Rivers Association

Blower, B

Bielderman, A I

Blaby District Council

Blundell, J K

Bournemouth and West Hampshire Water

Bristol Water PLC

British Aerospace – Royal Ordnance Ltd

British Canoe Union – South West Regional Committee

British Hydropower Association

British Institute of Architectural Technologists

British Marine Industries Federation

British Soft Drinks Association Ltd

British Trout Association

British Waterways

Broadland Agricultural Water Abstraction Group

Broads Authority

Broads Society

Burns Valley Action Team

Caldicot and Wentlooge Local Drainage Board

Cambridge Motor Boat Club

Cambridgeshire County Council

Centre for Ecology and Hydrology, Wallingford

Centre for Ecology and Hydrology

Chartered Civil and Water Engineer

Chartered Institute of Purchasing and Supply

Chartered Institution of Water and Environmental Management

Chichester District Council

Chiltern Society Rivers and Wetlands Conservation

Chilterns Area of Outstanding Natural Beauty (AONB) Office

Confederation of British Industry

Conservators of the River Cam

Corus Group PLC

Council for the Protection of Rural England – East Anglia

Council for the Protection of Rural England – Wiltshire Branch

Country Landowners Association

Cutteridge, C

Council for the Protection of Rural England – Essex (CPREssex)

Dales, R C, Environmental Journalist

Dartford Borough Council

Dodds, J, Independent Hydrologist

[1] Area Environment Group. Non-statutory consultative group of external interested parties, set up by the Agency for each of its Areas.

Dunn, J

Dwr Cymru Cyf (Welsh Water)

Dwyryd Anglers Ltd

East Anglian Waterways Association

Eggett, D W

Elveden Farms

English Heritage

English Heritage – East Midlands Region

English Nature

ENTEC UK Ltd

Erewash Borough Council

Essex County Council

Evans, D, Water Resources Consultant

Farmers Union of Wales

Federation of Small Businesses

Findlay, W H

Friends of the Earth – Bicester

Gateshead Metropolitan Borough Council

Geological Society

Gloucester – Sharpness Canal Users Forum

Goodenough, F R

Gowing, D

Great Ouse Boating Association

Great Yarmouth Port Authority

Hanson Quarry Products Europe

Hertfordshire County Council

Hertsmere Borough Council

Inland Waterways Amenity Advisory Council

Inland Waterways Association

Inland Waterways Association – Cambridge Branch

Innogy (formerly National Power PLC)

Institute of Leisure and Amenity Management

Institution of Civil Engineers

Island 2000 Trust

Jennings, P

Kent and Essex Sea Fisheries Committee

Kent County Council

Kent Thames–Side Association

Kirkaldie, M S

Kitson (Lady)

Lark Angling and Preservation Society

Lark Valley Abstractors

Leicestershire County Council

Logue, V

London Borough of Redbridge

Lower Teign Fishing Association

Lymm Angling Club

MacDonald, A, University of Leeds

MacRae Farms Ltd

Mid Kent Water PLC

Middle Level Commissioners

Mott MacDonald

National Farmers Union

National Farmers Union of Wales

Norfolk Anglers Conservation Association

North Sea Action Group – Norwich and Broadland

The North West Federation for Sport Recreation and Conservation

North West Water Ltd

North Yorkshire County Council

Northumberland County Council

Northumbrian Water Ltd

Office of Water Services (OFWAT)

OFWAT – Wessex CSC

OFWAT Central CSC

OFWAT Southern CSC

Oldham Borough Council

One North East

O'Sullivan, G

Pembrokeshire County Council

Planning Inspectorate

Portsmouth Water PLC

Posford Duvivier Environment

Powergen PLC

Rees, A

REPAC/RFERAC/AEGs – North West Region

REPAC/RFERAC – South West Region

REPAC/RFERAC – Southern Region

REPAC/RFERAC – Thames Region

REPAC[2] – Anglian Region

RFERAC[3] – Anglian Region

RFERAC – Midlands Region

RFERAC – North West Region

Reynolds, T

River Waveney Regeneration Project Anglers Co–operative

Royal Institution of Chartered Surveyors

Royal Society for the Protection of Birds

Royal Town Planning Institute

Salmon and Trout Association

Salmon and Trout Association – Usk and Monnow

Salmon and Trout Association – York and District

Scottish Environmental Protection Agency

Severn Liaison Group

Severn Navigation Restoration Trust

Severn Trent Water Ltd

Shropshire County Council

South and West Cumberland Fisheries Association

South Staffordshire Water PLC

South West Rivers Association

South West Water Ltd

Southern Water PLC

Sport England – East Region

Surfers Against Sewage

Sussex Ornithological Society

Swale Borough Council

Thames Water Utilities Ltd

Three Valleys Water PLC

Ty Nant Spring Water Ltd

United Kingdom Irrigation Association

United Kingdom Environmental Law Association

Upper Thames Fisheries Consultative

Veal, M J, Corporate Building Engineer

Ver Valley Society

Water UK

West Berkshire Council

West Sussex County Council

Wilbraham River Protection Society

Wildlife Trusts

Wildlife Trust – Derbyshire

Wildlife Trust – Lincolnshire

Wildlife Trust – Somerset

Wildlife Trust – West Wales

Wildlife Trust – Yorkshire

Wiltshire and Berkshire Canal Amenity Group

WS Atkins

Wye Salmon Fishery Owners Association

Yorkshire Sports Board

Yorkshire Water Services Ltd

Zenith International Ltd

[2] Regional Environmental Protection Advisory Committee. Environment Agency statutory committee.

[3] Regional Fisheries, Ecology & Recreation Advisory Committee. Environment Agency statutory committee.

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