

# River Chess Association Response to Environment Agency South East Drought Plan Consultation 2011

## **Introduction to drought management (Section 1 – Introduction and relevant Appendices)**

### **1. Does this section provide you with a broad understanding of how and why drought happens? If not, please tell us if there is additional information we should consider.**

The River Chess Association is an organisation established to monitor and educate on issues relating to over abstraction and water quality and invasive species in and around the River Chess in Buckinghamshire and Hertfordshire. Our comments are therefore very focused on drought management specific to the River Chess.

We would like to see a clear definition of what constitutes a drought at a high level and an understanding of which stakeholders are prioritised when droughts occur. We see four stakeholder groups, households, businesses and leisure, agriculture and the environment. Without a clear view of priorities it is very difficult to establish an effective plan.

Not wishing to pre-empt later specific comments we would like to draw attention to the fact that the River Chess is already displaying all the characteristics of a drought. We would put this down to two factors, low rainfall and over-abstraction. Low rainfall cannot be controlled but over abstraction can. Both lead to drought conditions and dried up riverbeds.

When looking at Rivers and Groundwater in section 1.2 it is clear that environmental problems for chalk aquifers due to low rainfall can be identified in advance of the effects becoming manifest, such as dried up riverbeds. It is therefore important to take pre-emptive action, it is of no use instigating a hosepipe ban when the river has dried up. At that point it is too late and the environmental damage will have been done. This does not only apply to drought conditions but also to over-abstraction which is as big a factor causing low flows and environmental damage. It is our view that your Drought Plan has already failed on the Chess and the environmental damage has been done.

### **Section 1.2.1 Water resources**

Figure 2 in section 1.2 shows major rivers and aquifers. We would want to see a definition of a major river. We note that both the Misbourne and Ver are identified on the map but not the Chess, which we would argue is of equal importance as it maintains a number of fisheries and the one remaining commercial watercress farm in the Chilterns.

In section 1.2.1 relating to Water Sources, the River Chess sits in the North East Thames region and within the Veolia Central area of abstraction. Here the main water source, up to 70%, is from abstraction and not “more balance” as described in this section.

### **Section 1.2.2 Regulation of water resources**

The regulation of water resources is covered by section 1.2.2. The first paragraph refers to “conditions to stop abstracting when river flows drop below a specified point” we would be keen to know what the “specified point” is for the River Chess and what obligations are there to inform the public that the water company has been asked to stop abstraction.

We would like to see a reference to an appendix giving the detail behind *Figure 5 Spray irrigation licences in the South East*. The detail should give specific locations, the name of the licensee and the volumes they can spray. The appendix should indicate how these licences are monitored.

Augmentation schemes, we note there are schemes for both the Ver and Misbourne. We would like to see a scheme for the Chess. This would avoid the current problems we are experiencing in Chesham today, a dry river.

#### Section 1.2.3 Environmental issues

*Figure 6 Statutory conservation sites with water dependency* should reference an appendix providing details of the 480 water dependent conservation sites.

We have an issue with Thames Water discharging untreated sewage into the Chess from the Chesham Sewage Treatment works. The main excuse for this deplorable activity, supported by the Government and the Environment Agency is that these incidents only happen as a result of heavy rainfall and therefore the effect of the discharge is diluted by the higher flow rates in the river. As we know heavy rainfall has little of no immediate effect on the flow rates of chalk streams like the Chess. We can see circumstances where the river is suffering from low flows due to drought conditions and or over-abstraction and there is a heavy downfall of rain, sufficient to trigger a sewage discharge but not sufficient to relieve the drought conditions or significantly increase river flow rates. Under these conditions the environmental impact will be catastrophic. The drought management plan does not address what action needs to be taken to avoid this happening. We have a number of these conditions currently on the Chess all we now need is a heavy downfall of rain and bingo.

#### Section 1.2.4 Water Companies

For *figure 8 Significant water company abstraction and Transfers in South East* to be of any use it should reference an appendix giving volumes of the sources and transfers.

#### Section 1.2. 6 Other relevant plans and programmes

The River Basin Management Plan (RBM) states that it aims “to ensure no deterioration from the current status of any water body”. There is under Article 4.6 of the RBM plan the ability to “declare a temporary deterioration of good ecological status after a prolonged drought.” The Chess as far as we are aware is not in a drought state so we have to assume that the River Basin Management Plan has failed in our case as it obvious that the status of the Chess has deteriorated especially in Chesham.



The introduction does not provide a definition of what a drought is. It does explain that droughts are caused by a lack of rainfall, but does not provide a precise definition of what a drought is and what sort of geographic area this status can be applied to. This isn't clarified through the document. The Chess catchment has experienced low rainfall for some time and a significant length of the Chess has dried out, but a drought has not been declared. It would be useful to know what constitutes a drought and what does not, so that we can relate this to the conditions that we observe on the ground.

## **Section 2 – Drought Management in South East Region**

**2. Does this section provide you with a broad understanding of how drought affects people, business and the environment? If not, please tell us if there is additional information we should consider.**

We would like to see the Chiltern chalk streams referenced, they are often overlooked and their importance ignored.

There should be greater use of voluntary groups to assist with action plans. These groups are aware of the problems facing their rivers and can take remedial action such as fish rescues. The EA should be looking to harness this resource and offer training and guidance.

Fly monitoring by the River Chess Association has detected a decline in invertebrate diversity in recent months, including two trigger level breaches. Sections of the channel have been dry for several months. What level of environmental impact does there need to be before a drought is called?

## **Section 3 - Drought Triggers and Actions**

**3. Are our triggers and corresponding actions described clearly so that you known when and how we act, and that you know we have built in enough flexibility to manage any drought as it develops?**

Triggers are not clear, we would say that the Chess catchment currently exhibits drought conditions and they are not currently being acted on. We are not aware of hydrological indicator sites on the

Chess, none are included on your map in the appendices. We would like to see a definition “widespread evidence of environmental stress”. Does widespread mean across a whole region, or at a more local level? From what we see on the Chess the triggers are at too broad and do not identify localised droughts.

With regard media coverage we do not see this as an objective indicator. Are you saying you will only act when local MPs start to get uncomfortable and fear for their votes? Does this mean “safe seats” will be ignored? I must make it clear that this is not the case for the Upper Chess where we have a very active local MP who is genuinely passionate about the condition of the River Chess, one of the few to sign up to the “Our Rivers” campaign.

#### **Section 4 – Drought monitoring**

##### **4. Please tell us if there are any other actions that we should consider as part of our management of drought in the South East?**

The draft plan indicates that the smallest scale looked at for assessing drought status is the five area divisions of the region. We believe that triggers should be looked at on a smaller scale to identify localised pre-drought and drought conditions. River scale assessment would allow localised action. Voluntary and community groups are available to work on and monitor rivers. This would also allow you to work more closely with them to receive reports on the status of the rivers to act as a warning system for drought at a localised level?

#### **Section 5 - Drought permits and drought orders.**

##### **5. Do you think that the information on environmental monitoring shows that our drought surveillance is appropriate to the risk of drought? Please tell us if there is any additional information you think we should consider?**

Not appropriate to monitor the risk of drought on the Chess. The current situation speaks for itself, the Chess is dry down to Lord's Mill in Chesham but is not classified as in drought.

#### **Section 6 - Communications during a drought.**

##### **6. Do you think it will help us to deal effectively with the impacts of drought? Please tell us if there is any additional information you think we should consider.**

We suggest that the impacts of drought are being missed on the Chess. We would recommend liaising more closely with volunteer groups on rivers and using their monitoring data to pick up on environmental impacts of pre-drought and drought conditions so that action can be taken earlier.

##### **7. Please tell us if this section sufficiently explains how we deal with applications for drought permits and orders.**

No comments.

**8. Is there enough information on how and when we will communicate with our staff, our partners and abstraction licence holders during a drought? Please tell us if there is any additional information we should consider.**

No comments.

**9. Do you have any views on how we might engage and work better with groups and organisations to manage future droughts and promote the protection of the environment?**

Here we have nothing further to comment beyond those submitted by the Impress the Chess group.

*"In your communications actions you may wish to consider liaising with local river volunteer organisations that can be an effective means of communicating water efficiency messages within their community. It should be noted that voluntary organisations and riparian landowners, not just fisheries, do carry out work in rivers, such as aquatic vegetation management; these groups should also be contacted with guidance on what can and can't be done under drought conditions. It would be useful to know how you identify these groups and whether there is a means by which groups you do not currently liaise with, could identify themselves to you.*

*During the current drying episode on the Chess, we are aware that members of the public have been conducting fish rescues on the Chess (sticklebacks, bullheads, etc.) and releasing them downstream. Where no official fish rescues will be conducted, would it be helpful for guidance to be issued to volunteer groups on how to conduct this work safely and to the maximum benefit of the fish.*

*Under page 20 of the appendices it states that wildlife trusts and conservation groups should be contacted "as necessary". This should be routinely on declaring potential drought, and subsequently, as required"".*

**10. Please tell us if you have any other views or comments to make on this plan that have not been covered by previous questions.**

*No further comments*