

General Points on the WFD Consultation for the Thames Region

Dacorum Environmental Forum Water Group - Issues of Focus for 2009

Rainfall has continued from 2007 through 2008 to be of substantial benefit to water levels in the local aquifer but, thankfully, everybody remains diligent regarding their concerns upon sustainability of local requirements. Three Valleys Water have found that, with the continuing installation of water meters, they are confident of being able to meet the local requirements of inhabitants and businesses until about 2028.

This, of course, is based on the assumption that local inhabitants and businesses respect the need to use water sensibly.

The potential excessive development, as contained in the Growth at Hemel Hempstead Strategy, remains a major concern with regard to the provision of water. Whether the current global economic situation impacts on either the planned provision of additional housing, or the improvements to the local water infrastructure, remains to be seen. We must continue to promote our aims and objectives in these matters regardless.

We have previously recommended that the neighbourhood philosophy promoted by Geoffrey Jellicoe at the outset of the New Town would allow us the maximum benefit in terms of water conservation and energy conservation. It continues to be important that we keep in mind the fact that the existing level of population requires water which already exceeds the amount that can be sustainably abstracted from the local aquifer. It is illogical that neither the Environment Agency, nor Three Valleys Water, are required to be consulted regarding the availability of water before Central Government sanctions any large scale development, such as Hemel Hempstead is currently facing.

Consequences of the Buncefield Oil Terminal Disaster remain of concern, but nothing can be moved forward in this regard until the current investigations are completed.

This year has seen a wide variety of meetings with community groups, such as the Chiltern Society Rivers and Wetlands Conservation Group, the Chilterns Chalk Streams Project and the Ver Valley Society. We have also attended many meetings with such organisations as the Environmental Agency, Three Valleys Water and Thames Water, which will hopefully continue through 2009 to mutual advantage.

This year the DEFWG will be also focusing on the River Action Plans for the Bulbourne, Gade and Ver. These are due to be finalised shortly, following the brief consultation period. DEFWG will commit to their actions in the rivers' plans, as well as trying to move forward other projects which partners have agreed.

Regular perusal of the DEFWG Website will provide summaries of how these matters progress, together with the issues involved. www.defwatergroup.org.uk

Thames River Basin Management Plan (Feb. 2009 version)

The International Conference on Water and the Environment (ICWE) held in Dublin in 1992 presented four principles for water and sustainable development that continue to inform water management. These concern the finite nature of water resources, the need for a participatory approach, the central role women play, and that water has an economic value. More recently three principles have gained acceptance World Water Council (WWC, 2000). www.worldwatercouncil.org

An 'ecological principle' that stresses the management of water in an 'integrated' way, according to its hydrological units.

An 'institutional principle' that promotes decision-making on water resources to be decentralized to the smallest scale feasible i.e. engaging all stakeholders.

An 'instrument principle' which recognizes water as an economic good.

The draft management plan clearly recognizes the ecological principle, but there is much less on engagement of stakeholders nor methods, including economic, of influencing consumer behaviour. As such it becomes a list of environmental objectives. The detailed points below will note that the list of environmental issues is comprehensive and a useful baseline assessment. However, without clarity on the processes by which these improvements are brought about there is a fear that we are back with the historic NRA-catchment management plans and little prospect of participatory engagement beyond 'public consultation'..

The approach has been to raise issues that arise from current monitoring so that forecast improvements can be assessed from 'baseline' conditions for the river basin. This leads to an emphasis upon the physical (biological and chemical) environment with less attention paid to the human environment except as a principal cause of the problems and challenges. The WFD stresses the integrated nature of catchment planning which is not so evident in this Management Plan. This is understandable given the need to establish (environmental ?) objectives. If the human environment is however presented as an equal contributor to the solutions (this starts to enter the document later) then we start to get to a key strategy in the WFD which is stakeholder engagement for a sustainable future.

Section 2 on the Region

Is the designation of 'water bodies' p5 appropriate at the local level to capture conditions ? (Annexes would have been useful to answer this). It may be the level of aggregation (averaging) masks too many local conditions or hot spots.

P7 states that rainfall levels are below the national average and Thames is one of the driest districts . New York receives more annual precipitation than Manchester but anyone visiting NY in the summer will not describe this as wetter than NW England ! Making a point of rainfall (precipitation) being below national levels is not really that useful, it is the extremes that cause management problems. Surprisingly little is made (until later) about climate change impacts. The context for the region is less about rainfall being less than North West England than the high levels of consumption and waste in the Thames region that has made it necessary to develop high levels of water re-use and management compared to other regions in the UK and this presents specific challenges.

It would be useful to have some indication of regional demographic and development trends, in particular the built environment. We can assume there will be spatial differences and the location of environmental 'hot spots' will change through time. There is no indication (so far) where these hot spots are to be found (or even how to locate) ? The later maps are drawn at too high a level of aggregation for this level of inspection.

Section 3.0 Environmental Outcomes.

It is laudable to state these objectives. However from NRA Catchment plans onwards we have seen such statements. It would help to identify any new objectives, or better still those that it has proved difficult to meet e.g. with drier summers ? Are these the same objectives of 20 years ago ? How have priorities changed ?

3.3 Transport and the Built Environment

As an example section, this covers many (if not all ?) key areas from sewerage system leaks through to road runoff but there is no clear prioritisation so it is difficult to respond except to conclude there has been a comprehensive review for all sections. Of concern is para 3.3.3 which rightly points to the density of population which it is expected will increase – there is almost a passive acceptance of this ? Section 3.3.11 merely indicates awareness raising ?

3.4 Future development

The main risks commence with flood defences, moving through to road runoff. Fully support the contention that water resources (p14) are stressed and new housing developments will exacerbate this. However there is no discussion of consumption nor of adaptation, so the emphasis lies on resources and resource management rather than influencing behaviour other than through regulation.

Generally written at a regional level so difficult to engage with a local perspective, except to say that if the waters high in the catchment are not in prime condition then they will be far worse downstream. Welcome the recommendation in para 3.7.7. that sewage treatment works need improvement throughout the region, together with retaining discharged water within the local catchment.

Section 4 Water Environment

A good list of issues in para 4.1.3 (p19) that cover low flows, urban runoff.

Interesting to note flooding is not listed and yet it often appears in local discussions.

No mention of access/ public use ?

Table 1 on natural water bodies, surprised the level of natural water bodies is as high as this as would have felt most were significantly subject to anthropogenic (human) influences ?

Section 5 Objectives

The levels of aggregation of the data e.g. for river length are so high that any change will have to be either very extensive or of high magnitude to register. Is it best for such a large region to present objectives at this level (details may be in the annexes) ? Why isn't the goal (figure 9 p25) to eradicate all bad sites by 2015 rather than by 2021 ? What account has been taken of predicted climate change and urban/industrial development ?

Maps – e.g. figure 12 are powerful representations and welcome but without place names or other sources of reference their information is difficult to extract.

Section 6.2 Colne Catchment

This is the area of prime i.e. local interest for the Dacorum Environmental Forum Water Group. There has been at least (probably more) a period of two decades discussing the issues raised here from over abstraction through to low flows. Some of the strategies listed such as sustainable drainage and review of new housing developments are welcome. A longer historic time scale would recognise the previous pristine state of the chalk streams in this area, restoration of which must be the objective rather than just improvement.

Section 8.0 Planning

Climate change, future growth (development), flooding and coastal erosion are identified.

Feedback Suggestions:

Urban drainage (SUDS) requires specific action, including the role of wetlands for both peak runoff storage and water quality improvement.

Consumption, para 4.2.5 p20 appears to be the first mention of rising consumption yet this is the driving force for many issues. Why is there so little here on managing consumption ?

There is a complex and often confusing institutional organisation of bodies concerned with water, drainage and sewage. It would be useful to have a simple explanation for the public so that issues can be directed to the appropriate person(s). – we note there is further information on the EA web site but even then information about the EA Board for example does not help deal with canal water issues for example which spill over to British Waterways.

Engagement of Stakeholders

A key element of the WFD is engagement of stakeholders but it is not always clear what participation consists of. There is a large academic literature on participatory planning so there really shouldn't be a lack of advice on how to achieve this aim but the key must be engagement in decision making not just consultation exercises. Consultation centres on raising issues , 'what do you think, what are you concerned over ?' Stakeholders can rapidly become disillusioned with consultation, especially when in reality 'expert decision making' is dominant.

Process is as important as consultation, otherwise this is merely a snap-shot of issues in 2009 with future aspirations. Alongside objectives we need to establish mechanisms/ strategies that permit continuous engagement of stakeholders.

Social Adaptation

Changes are necessary, people have to adapt. Adaptation has too often been seen as a technical strategy e.g. flood defence measures, but now there is an acceptance that the ability of people to adapt i.e. their resilience needs attention. There is also a growing academic literature on adaptation, fuelled by discussions of global warming/climate change. The ability to adapt can depend upon a variety of social and economic factors, in essence the assets that people can draw upon. One of the key assets is social capital. Robert Putnam a well known academic writer on this topic recently published a book called, 'Bowling alone' in which he points to the decay of social capital in western societies. The thesis is that we are now less resilient than we once were because of increased isolation, fragmentation of the family etc. Social Learning and the key role of social capital is a missing element in the management plan as sustainable solutions require that society supports the management plans through actions at the local level.

Action:

Deploy key stakeholder groups such as the Local Authorities, Three Valleys Water, Thames Water, National Trust, Box Moor Trust, local farmers and landowners, Dacorum Environmental Forum Water Group, Countryside Management Service, Chiltern Society, Chiltern Chalk Stream Officer, Ver Society, Colne Valley Anglers Consultative, Thames Rivers Restoration Trust to facilitate adaptation rather than solely imposing controls through regulation.

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