

Technical Officer (CAMS)
Environment Agency
Rivers House
East Quay
Bridgewater
Somerset
TA6 4YS



29th January 2008

Dear Sir/Madam,

Consultation on the Little Avon CAMS.

Thank you for inviting the Cotswolds Conservation Board to comment on the Little Avon CAMS. The following response is based on the Board duties and Cotswolds AONB Management Plan.

Background to comments.

The Board was established by Parliamentary Order under part iv of the Countryside and Rights of Way Act 2000. The duties of the Board are :

- To conserve and enhance the natural beauty of the Cotswolds AONB
- To increase the understanding and enjoyment of the special qualities of the AONB, ensuring these are compatible with its conservation and enhancement.

In carrying out its twin duties, the Board shall seek to foster the economic and social well-being of its local communities.

The CROW Act 2000 underlined the importance of AONBs and introduced specific requirements for local authorities and public bodies, including the Environment Agency, in looking after these special areas.

The Cotswolds Conservation Board will want to see within the CAMS the following measures:

- Sustainable and efficient use of water
- Protection of water resources, including catchments and aquifers
- Protection of water quality and river flow throughout the AONB
- Protection of water resources and rivers and streams in the long term through practical measures and advice.

Water abstraction can have a detrimental effect on river flows and consequently on landscape and biodiversity. The predicted impact of climate change will exacerbate this issue. The control of abstraction licences, especially if combined with water efficiency conditions can help tackle the problem. Consequently, the Environment Agency, in part through the CAMS, should take a firm approach, especially at times of low flow and include resource recovery if necessary.

An appendix covering the Cotswolds AONB Management Plan is attached to this response providing further background.

WRMU 1 – Berkeley

Q1. Do you have additional information about water resources in WRMU 1?

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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No

Q 2. We believe that current abstractions do not affect the environment in this WRMU. Do you agree? If not, please tell us why.

Yes. The information provided suggests no current affect on the environment. However, there is the need for constant review, particularly in light of climate change predictions.

Q 3. Do you agree that all licences are issued with Hands-Off Flow constraints to ensure no further water is abstracted at very low flows?

Yes. The Conservation Board strongly supports this policy

The Board fully supports the proposed licensing strategy for this WRMU outlined on page 16.

WRMU 2 – Michael Wood

Q1. Do you have additional information about water resources in WRMU 1?

No

Q 2. We believe that current abstractions do not affect the environment in this WRMU. Do you agree? If not, please tell us why.

Yes. The information provided suggests no current affect on the environment. However, there is the need for constant review, particularly in light of climate change predictions.

Q 3. Do you agree that all licences are issued with Hands-Off Flow constraints to ensure no further water is abstracted at very low flows?

Yes. The Conservation Board strongly supports this policy

The Board fully supports the proposed licensing strategy for this WRMU outlined on page 21.

Other comments.

Part of the CAMS area coincides with the Cotswolds AONB. Although shown on map 8 and mentioned in passing on page 32, there is no explanation of what an AONB is and its impact on the CAMS. A paragraph needs to be included in section 7. It should be noted that section 85 of the CROW Act 2000 places a duty on all public bodies and statutory undertakers to have regard to the purposes of conserving and enhancing the AONB when carrying out their operations.

Paragraph 7.9 mentions the Cotswold Way. The Cotswold Way is a National Trail and not a long distance footpath.

If you wish to clarify or discuss further any of the above comments, please do not hesitate to contact me.

Yours sincerely,



Mark Connelly

Land Management Officer

Little Avon CAMS Consultation - Appendix

Cotswolds AONB Management Plan

The Countryside and Rights of Way Act 2000 created a new statutory duty for all AONB local authorities to prepare and publish AONB management plans before 1st April 2004. These plans have to take into account the observations of Natural England and are signed off by the Secretary of State. The plans formulate policies for the management of the AONB and include key actions for carrying out their functions in relation to the area. The Cotswolds AONB Partnership, which preceded the establishment of the Conservation Board comprised of 17 local authorities within a partnership of 34 local, regional and national organisations, guided the production of the management plan as a single plan for the whole AONB to meet the requirements of Section 89 of the CROW Act 2000. Subsequent to the adoption of the management plan by all 17 local authorities, the Cotswolds Conservation Board has been established. The Board has now adopted the management plan as the basis for its work and, as required by the CROW Act, is undertaking a review of the plan.

Role of the Management Plan

The Management Plan relates specifically to the designated area of the Cotswolds AONB and also to any developments outside it that may impact upon its conservation and enhancement. It provides a strategic context for the actions of many organisations. It is intended to provide direction in the long-term period of about 20 years but the focus is on policies and priority actions for 5 years. While the plan operates alongside statutory plans and programmes and a considerable range of other initiatives, it is statutorily required under Section 89 of the CROW Act 2000 and is intended to be a significant influence over a wide range of future decisions that affect the AONB.

One of the special characteristics of the AONB that the management plan identifies is:

Good quality water – is also to be found throughout the AONB, which is important for rivers and streams and for the aquatic life they support. It is also a significant source of drinking water for communities throughout the AONB and beyond its boundaries.

The Cotswolds AONB management plan contains a key issue specific to water:

SRK6: Water

The AONB benefits from high quality water and there are important aquifers within it. It is important to preserve these assets.

Water supply is a major issue within the Cotswolds. Abstraction accentuates fluctuating river levels, with low flows at certain times during the year. Such low flows cause a number of problems, for example by concentrating any pollution within rivers and streams. This has a detrimental effect upon wildlife and reduces the amenity value of watercourses, which are often an important element of the landscape and a particular attraction to visitors. More incidences of heavy rainfall also cause silting and adversely affect water quality and habitats. Climate change may well accentuate such problems so measures to reduce run-off and conserve water should be pursued.

Two aims are relevant:

SR1 – to encourage the most sustainable, effective, and efficient use of all natural resources, including supporting waste reduction and recycling

SR5 – to support protection of water resources, including catchments and aquifers, and water quality and river flow throughout the AONB within a context of threats from climate change.

Relevant Policies:

SRP1 – to promote the most sustainable, effective and efficient use of all natural resources and energy sources within the AONB.

SRP7 – To protect water resources and rivers and streams in the long term through practical measures and advice.

Relevant Priority Action

Work with the Environment Agency, water companies and other relevant interests to provide practical advice to landowners on water conservation measures to protect water resources and rivers and streams in the long term.

Cotswolds AONB Management Plan 2004.

The Cotswolds AONB Management Plan is available from the Cotswold Conservation Board or it can viewed on the website: www.cotswoldsaonb.org