

# Response ID ANON-ZKVR-6RHA-X

Submitted on 2014-02-22 09:33:15.710040

## Introduction

### 1 What is your name?

**Name:**

Friends of the Mimram

### 2 What is your email address?

**Email:**

Suecheek@btinternet.com

### 3 Which region of the country are you based?

**Region :**

East of England

### 4 What sector are you from?

**Select your sector:**

Other

### 5 Do you have an abstraction licence?

No

## Abstraction Reform

### Change from seasonal licences to abstraction permissions based on available water

### 6 What are your views on the proposal to convert seasonal licences into abstraction permissions based on water availability?

**Views on seasonality :**

The concept of Water Shares of available water once an environmentally acceptable level has been achieved is good.

However, we do urge that the commitment to reform the abstraction process needs to be built into the current Water Bill, to show the Government's commitment to making this change happen. The environment and in particular the UK's rare chalk streams cannot wait.

## Linking water allocation to availability

### 7 What do you think about the different proposed approaches to linking abstraction to water availability for surface water and groundwater abstractions?

**Thoughts on different approaches to linking water to availability :**

Water Shares is a much better scheme than Current System Plus as it really uses the concept of sharing the available water.

Since groundwater takes longer to recharge, monitoring what is available for sharing after the environmentally acceptable minimum, will be crucial so that short term opportunism is not taken at the expense of longer term recharge.

### 8 Would it be helpful if abstraction conditions required abstractors to gradually reduce their abstraction at low flows before stopping, rather than being just on or off?

**Would it be helpful if controls on abstraction were gradually introduced :**

Yes

### 9 Do you think the proposal to protect the environment using a regulatory minimum level at very low flows is reasonable? If not, how do you think we should protect the environment at very low flows?

**Thoughts on the proposals to protect the environment at very low flows:**

Yes, a regulatory minimum would be essential subject to:

1/ the catchment area be small enough to reflect local needs eg at each abstraction point or river tributary.

2/ the minimum is not based on historic levels but is based on the minimum level required to reach Good Quality WFD status. (IE the chalk streams have been over-abstacted for years) 'No environmental deterioration' is not good enough. It needs to be set at a restorative level.

3/ the new minimum levels need to be set BEFORE the transition to the new system.

## Managing discharges so their value is recognised

**10 What do you think of the proposal to require abstractors who discharge water close to where they take it from to continue to discharge a proportion in line with their current pattern?**

**Affects of proposals to require discharges to continue:**

Discharging water close to the point of abstraction is a good idea.

However, chalk streams are pure water, so any 'recycled' water is going to degrade the quality of the water in this instance.

**11 How best do you think water company discharges should be regulated to provide reliable water for downstream abstraction without impacting on water quality objectives or constraining flexibility in water management?**

**Thoughts on regulating water company discharges:**

## A charging system that reflects water use and reliability

**12 If you are an abstractor, how would these charging proposals affect your business?**

**Thoughts on charging proposals:**

**13 To what extent would a system that charges abstractors partly on permitted volumes and partly on actual usage (ie a two part tariff) encourage abstractors to use less water?**

**Would the two part tariff encourage efficiency?:**

A two tier tariff is a good idea as there is an incentive to use less water

## Facilitating trading to promote efficiency and resilience

**14 Would quicker and easier water trading benefit abstractors now? How beneficial do you think it would be to abstractors in the future?**

**Is quicker and easier trading of benefit? Would it be in future?:**

Water trading is not a good idea for anything other than water companies as it encourages extra abstraction above that what is needed, which the two tier pricing is trying to discourage.

In addition, extensive measuring equipment will be needed to ascertain the available shares after the minimum level. To provide real time data for spot trading requires even more, yet the EA is facing cutbacks. Outsourcing the management of such a system would be an idea and trialling it on a limited basis to prove the Return on Investment before national roll out would be key.

**15 To what extent do you see additional benefits in the wider range of trades that can happen under the Water Shares option, compared to the Current System Plus option?**

**Can you see the benefit of water shares trading compared to the current system plus:**

**16 Do you agree that participation in abstraction trading should initially be limited to those with a direct interest in abstracting water?**

**Should the market be constrained?:**

Yes, and then only to the water companies. Otherwise you encourage higher levels of abstraction than are actually needed

## Reviewing abstraction permissions to protect the environment in future

**17 Do you support our proposals for a more consistent approach to making changes to abstraction conditions? If not how would you improve the proposals?**

**Do you support our proposals on changing abstraction conditions? how would you improve them?:**

The proposals seem well thought through for river abstraction, but less so for groundwater, which is key to the survival of UK's rare chalk streams.

The lag in recharge needs to be assessed when calculating the available water after the environmentally acceptable minimum.

**18 What notice periods do you think would best balance the needs of abstractors and the environment?**

**What notice period is best?:**

Six years in total - to include any trials.

**19 Do you support the proposal to remove the payment of compensation for changes to abstraction conditions and to phase out the collection of the Environmental Improvement Unit Charge through abstraction charges?**

**Do you support the proposal to remove the payment of compensation for changes to abstraction conditions and the collection of EIUC? :**

Yes, we agree that compensation should be removed. However the EIUC does provide the EA with a small budget for river improvements that would not otherwise be funded.

## Moving to a new system

**20 Do you agree it is important to take measures when moving licences into the new system that would protect the environment from risks of deterioration?**

**Do you agree it is important to take measures when moving licences into the new system that will protect the environment?:**

In moving to the new system, 'No deterioration' is not good enough.

Many of our chalk streams, especially the Mimram and Beane, have suffered from over-abstraction.

Using a 'No deterioration' basis would keep these rivers at their current WFD Poor Quality status.

The minimum level needs to be set so that the flows are sufficient to be able to reach 'Good Quality' status and be put in place before transition to the new system.

**21 Would you prefer us to consider the risks in each catchment when designing the rules for moving licences into a new system, or should we treat all abstractors in the same way regardless of water availability?**

**Should catchments be treated individually or the same when moving licences into new system?:**

The size of each catchment has not been determined. They need to be sized to meet local needs. Ideally there would be a defined catchment area around each abstraction point. If not at that level, at river/tributary level (ie Mimram alone). Combining it into the River Lea or Thames valley will hide the needs of this rare chalk stream so that it would not benefit from Water Sharing, which is a really good idea

**22 What would be the most effective method to calculate the new annual limits to be transferred into the new system (for example average annual, average peak or a combination of actual and licensed volumes)? And what assessment period should be used to calculate them?**

**What's the most effective way to consider previous use and what period would be most effective?:**

First the new minimum level needs to be established which allows the river to recover to 'good status', not just 'No deterioration'. Then the share percentage should be based on actual average usage

**23 Do you support the establishment of a water reserve to support economic growth?**

**Do you support the creation of a water reserve?:**

We support the establishment of water reserves to provide water at drier times, rather than just selling for profit.

## Implementation and the Next Steps

**24 Do you wish your details to be kept confidential?**

**state requirement and reason for confidentiality request:**

We are happy for our name to be made public, but not our email address.