

Whitewater Valley Preservation Society response

Email: contactus@whitewatervalley.org.uk

Section 8.1 - Comments on specific issues

The Whitewater Valley Preservation Society (WVPS) is a small Society with 250 members consisting of riparian owners and residents who live along the nine miles of the valley, and among whose objects are to protect the health of the River Whitewater, a north flowing chalk stream in north eastern Hampshire, and its valley.

The Environment Agency (EA) will be well aware that the River Whitewater has failed to meet Good Ecological Status (GES) under the Water Framework Directive (WFD) although WVPS regards the findings of the WFD assessment as only partly reflecting the seriously deteriorated state of the river.

As a direct result WVPS has worked to raise funds to carry out a study into the Whitewater in the context of the Salmon and Trout Conservation UK's River Fly Study. Results from the first year reveal the significant effort that will be required to make improvements to the river's ecology. The type of work likely to be required will be directly affected by the proposed increase in charges for river works. As a result, it will deter organisations such as WVPS from being able to carry out the works and thereby will effectively further damage the river ecology.

The Society is therefore writing to object to the scale of proposed increases for charges for permits to carry out habitat improvement works of benefit to fish stocks in our local rivers. Throughout this consultation there is distinction made between environmental 'improvement' and commercial gain. There are many community groups, angling organisations, river trusts, wildlife groups and Societies such as ours who, with limited funds, are currently making a very real and important contribution towards improving rivers and streams and the implementation of the Water Framework Directive on failing water bodies. The work of these groups is not recognised in the assumptions behind the revised proposed charges. The proposed charges are extortionately high - far too great reasonably to expect small organisations to pay, especially for small scale community based work relying on charitable funding and volunteer labour.

The charges imply that there will be financial gain from river improvement but for the projects organisations such as ours wish to undertake. This is not true: the benefit is to the wider ecology and to society and to meet Water Framework Directive objectives.

The proposed charges therefore penalise people for doing the right thing.

The charges will deter anyone thinking about making improvements to their river from making any contact with the EA. This will mean that the expertise and advice available will not be accessed and poor quality unconsented works will result. The current 'exemptions' are confusing but improving the exemptions so that they are workable would be a positive way forward.

A two tier charging system with much lower rates for charities and works carried out for ecological improvement and public benefit should be introduced.

EA: We would be interested in any analysis you have that suggests our proposals will influence the market conditions in your sector and whether there will be an impact on future investment decisions and on new entrants to the sector? Please provide full evidence you have to support your answer along with any possible mitigating actions:

You surely do not need a research project to understand the presumably unintended consequences of increasing charges levied on small, charitable and/or voluntary organisations with the ecological interests of water bodies at heart.

Studies during 2017 of the River Whitewater have shown it fails to meet any invertebrate or biometric measure of the ecological standard expected of a chalk stream. Amongst reasons for this failure are over abstraction of the aquifers resulting in siltation and concentration of pollutants. Works which would be the subject of your charging proposals could include placing woody debris to improve localised flow. The Whitewater is not a "famous fishing river" which attracts high rod fees. Does it seem reasonable to you that Societies such as ours (not a fishing club) should have to incur charges for doing the work, which the EA should be undertaking to meet WFD targets?

EA: Do you have any analysis that suggests the charge increases will impact on SMEs in your sector? If so, which companies are most likely to be affected and what do you think will be the consequences?

Comments:

See above. Stop assuming this is all about companies and profit!

Section 8.3 - About you

Responding on behalf of an organisation or group

EA: If you're responding on behalf of an organisation or group, please tell us who your responding on behalf of and include its type, e.g. business, environmental group:

Whitewater Valley Preservation Society is a small Society with 250 members consisting of riparian owners and residents who live along the nine miles of the valley, and among whose objects are to protect the health of the River Whitewater, a north flowing chalk stream in north eastern Hampshire, and its valley.

Your obsession with enterprises (question 78) is astonishing and seems odd given the amount of work local EA staff do with voluntary organisations!

EA: You will receive an acknowledgment email and we will notify you when the consultation response document has been published.

Email:

ContactUs@WhitewaterValley.org.uk