

Response form

Consultation on 'Drought: how it is managed in England' The updated national drought response framework

Your details

When we come to analyse the results of this consultation, it would help us to know if you are responding as an individual or on behalf of an organisation or group.

Are you responding as an individual or on behalf of an organisation?

Please choose one of the following:

- Individual response
- Responding on behalf of an organisation or group (for example, charity, not-for-profit organisation, trading body)
- Other

If you're responding on behalf of an organisation or group, what is the name of the organisation or group?

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If you selected other, please explain your area of interest.

What sector do you represent?

Please choose one of the following:

- Government and regulators
- Environment
- Agriculture and horticulture
- Public water supply
- Navigation
- Recreation
- Energy
- Business
- Industry
- Other

If you selected 'other', please tell us your sector:

Privacy

The Environment Agency would like to keep you informed about the outcomes of the consultation. If you would like to receive an email acknowledging your response and telling you when we have published the consultation response document, please provide your email address with your response.

What is your email address?

By giving us your email address, you consent for us to email you about the consultation. We will keep your details until we have notified you of the response document publication.

We will not share your details with any other third party without your clear and full consent, unless required to do so by law.

You can withdraw your consent to receive these emails at any time by contacting us at drought.national@environment-agency.gov.uk

Email:

Can we publish your response?

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

Can we publish your response? This is a required question.

Please select one of the following:

- Yes
 No

If you answered no, please tell us why as we will need to understand this when responding to any freedom of information requests:

Enter comment here

The Environment Agency is the data controller for the personal data you provide. For more information on how we deal with your personal data please see our [personal information charter](#) on GOV.UK.

You can email our Data Protection team: dataprotection@environment-agency.gov.uk.

How we will use your information

The Environment Agency will make all responses publicly available after the consultation, unless you have specifically requested that we keep your response confidential.

We will not publish names of individuals who respond.

Throughout the consultation we will make all comments (excluding personal information) publicly available on our Citizen Space website. This includes comments received online, by email, post and by fax, unless you have specifically requested that we keep your response confidential. We will not publish names of individuals or personal data. But we will publish the name of the organisation for those responses made on behalf of organisations.

We will not respond individually to responses. After the consultation has closed, we will publish a consultation response document on GOV.UK in which we will publish the name of the organisation for those responses made on behalf of organisations and contact you to let you know when this is available.

Returning your response

Your response to this consultation needs to be returned by **10 January 2025**.

We would like you to use this form if you are not submitting your response online. You can return it by email to drought.national@environment-agency.gov.uk. Please use this email address if you have any questions regarding this consultation.

We welcome your views on the document 'Drought – How we manage it in England'

Question 1. Before reading 'Drought: how it is managed in England', how familiar would you say you were about drought management in England?

Please choose one of the following:

- Not at all
- A little
- Somewhat
- Moderately
- Very

Question 2. Refer to Section 1: 'Drought in England: an overview'. Does this section clearly describe drought in England?

Please choose one of the following:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to answer

Why do you think this?

See general comments below

Question 3. Refer to Section 2: 'Drought impacts and mitigations'. Does this section clearly describe the impacts of drought and some of the actions other sectors take to mitigate these impacts?

Please choose one of the following:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to answer

Why do you think this?

See comments below

Question 4. Refer to Section 3: 'Planning, management and response'. Does this section clearly describe the responsibilities of the Environment Agency, government, public bodies, regulators, water companies and local responders in drought planning, management and response?

Please choose one of the following:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to answer

Why do you think this?

See comments below

Question 5. Refer to Section 4: 'Our drought teams and actions'. Does this section clearly describe the Environment Agency's drought stages, response arrangements, drought actions and triggers, monitoring and data?

Please choose one of the following:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to answer

Why do you think this?

See comments below

Question 6. Considering your responses to questions 4 and 5, how well do you understand the scope and purpose of Environment Agency area drought plans described in sections 3 and 4?

Please choose one of the following:

- Not at all
- A little
- Somewhat
- Moderately
- Very

Why do you think this?

This is a subjective question which serves no useful purpose

Question 7. Refer to Section 5: 'How we communicate with others'. Does this section clearly describe the Environment Agency's role in drought communications and the tools we use to do so?

Please choose one of the following:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to answer

Why do you think this?

See below

Question 8. Refer to Section 6: 'Recovery'. Does this section clearly describe the Environment Agency's role in recovery and how we seek to learn from each drought?

Please choose one of the following:

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to answer

Why do you think this?

See below

Question 9. After reading 'Drought: how it is managed in England' and answering these questions, are there any inaccuracies you would like to highlight or any other suggested improvements you would like to make?

See below

Question 10. After reading 'Drought: how it is managed in England' and answering these questions, do you have a better understanding of how droughts are managed in England, the respective roles of the organisations and groups involved, and how they work together to minimise the impacts of drought?

Please choose one of the following:

- Not at all
- A little
- Somewhat
- Moderately
- Much better

Why do you think this?

See below

Question 11. Which Environment Agency operational areas are you most interested in with respect to drought?

A map of the Environment Agency's operational areas can be found at: [Environment Agency area and region operational locations](#).

Select any that apply:

- All (National)
- North East
- Cumbria and Lancashire
- Yorkshire
- Greater Manchester, Merseyside and Cheshire
- Lincolnshire and Northamptonshire
- East Midlands
- West Midlands
- Wessex
- Devon, Cornwall and the Isles of Scilly
- Solent and South Downs
- London
- East Anglia
- Thames
- Kent, South London and East Sussex
- Hertfordshire and North London
- Prefer not to answer

Question 12. What are your thoughts about how drought has been managed in your local area?

See below

Question 13. Do you have any specific concerns about local environmental drought impacts that you would like us to know about?

See below

Question 14. How engaged did you feel with the Environment Agency and other stakeholders during the last period of prolonged dry weather or drought?

Please choose one of the following:

- Not at all
- A little
- Somewhat
- Moderately
- Very
- Prefer not to answer

Why do you think this?

See below. Very odd subjective question.

Question 15. How do you think the Environment Agency and others can better work together during prolonged dry weather and drought?

See below

We have real concerns about the questions in the consultation. They are overwhelmingly subjective: how the reader feels about the drafting, whether the reader felt “engaged” in the last drought and whether the document *describes* the reality on the ground (“does it clearly describe”: drought impact, drought actions” and “responsibilities” of various bodies; “communication”, recovery and so on.) There are a few vague questions on the actual systems in place, relating only to “local areas”. But these questions are misdirected and not aimed at what appears to be the real issues: a lack of an effective regulatory system and the chaos of multiple groups and teams whose aims and obligations are, at best, obscure.

We fail to understand how direct answers to these questions would in any way lead to enlightenment or a better understanding of how the management of drought can be improved. Instead -as below – we have provided our comments on the document and what we believe to be serious issues that need addressing in dealing with drought.

The document ‘Drought: how it is managed in England’ is primarily a high-level descriptive document which covers definitions of drought, historical records (with the overarching message that droughts are natural events that are experienced more frequently and severely because of climate change). It lists the various groups and processes without a proper structure and discussion to demonstrate how the system works. It is not immediately clear whether this document is simply meant to explain the layerings of management or to perform another esoteric task. It is therefore not clear how the stated aim to “*incorporate lessons from the past*” has been successful (nor to understand whether the “*strategic overview of drought management in England remains up to date*” or how this means the area drought plans “*put us in the best position to respond to the next drought.*”)

Apart from the basic description of process in section 4 which attempts to link drought stages to “actions”, the document is undynamic, with short, static, segmented paragraphs relating to specific and unintegrated observations. It describes entities and duties but with a limited sense of positive action or process.

The document lists the confusing array of management layers, teams and groups involved in the process of assessing and reacting to drought (“*national hydrology team*”; “*national drought team*”; “*national and local response teams*”; “*technical drought teams*”; “*strategic duty managers*”; “*strategic teams*” and “*cells*”; a “*team dedicated to comment and input on the specific application*” for drought permits and orders; the “*National Drought Group*”, its subgroups: “*Water Supply, Environment, Agriculture, Land Management, and Communications*”; the “*local resilience forum*”; the “*strategic coordination groups*”; stakeholders and combined groups such as the “*Water for Food Group*”; “*water abstractor groups*” and so on).

Most of these appear to be non-statutory bodies or creations without a clear understanding of how they relate to each other, whether their inputs are substantive and whether there is duplication or even whether these groups – particularly the stakeholder forums – are primarily devised as outlets for stakeholder frustration rather than as advisory or decision-making bodies.

There is a description of the process for drought order and permit applications. Such information is available elsewhere and follows the statutory regime. There is no suggestion that the regime will be changed or that (for instance) the EPR will be amended to include abstraction and abstraction related applications including for drought. Simply describing the system as it is does not enlighten or assist; nor does it provide a guiding framework for protecting rivers or meeting goals.

Of course, the questions in the consultation do not ask us to comment on the inadequacy of the system, as the consultation is restricted in scope. Nonetheless, we would say that there is a lack of real connection and coordination between specific actions and drought plans as well as long term measures set out in the WRMPs; there are obvious absences in background and baseline understanding of water resources in rivers and streams including a failure by the EA to set minimum acceptable flow levels for rivers (s 21 WRA) making our understanding of the impact of abstraction on rivers in times of drought very difficult to ascertain. We also suggest that there is no need for so many management layers which inevitably leads to inaction.

On the subject of agricultural abstraction, we note there is no consideration given to the on-going and unacceptable and unmonitored impact of exempted abstraction under s 27 WRA and a real failure to curtail this under existing legislation.

As an organisation that operates across the UK, we can see that drought has more extreme impacts in the South. In particular, we have been involved in campaigning to protect chalk streams such as the Test and Itchen that have been subjected to over-abstraction and, effectively sacrificed in times of drought. We believe that the question of whether to abstract beyond hands off flows and the inevitable reliance on IROPI to continue to operate when there are low flows is unacceptable. The situation would not have arisen if water companies – for instance, Southern Water - had been forced to put in place effective long-term water supply measures. As for how local structures can effectively manage abstraction in times of drought, we believe that the system is chaotic, poorly managed and overwhelming dictated by the water companies. Whatever the outcome of endless meetings between any number of the stakeholder groups, the EA must act in the best interests of the rivers. But that is not what has been happening.

The monitoring systems which are supposed to provide baseline and actual data in times of drought and to monitor the effects of drought orders and permits are basic – measuring, for instance, fishkill and not the detailed evidence of biodiversity impact. The EA places too much of a burden on NGOs to provide data on the impact of drought permits and orders when it should be doing this work itself. The framework document would benefit from insisting on what the EA should be doing if and when these drought provisions are invoked. It is also vital that monitoring, data and the analysis that follows should carefully distinguish between a healthy river (as it should be without the pressures of abstraction); the impacts of routine abstraction; the impact of the drought itself and that of the drought permits and orders. The document is clear that basic monitoring is the norm, but additional monitoring is only discretionary; the catch being that, “the type and location of monitoring is unlikely to change significantly” (para 4.9.1).

As a general point to guide the EA, we would say that the primary position of the regulator (which is not covered by the document) should be the aim to *obviate* the need for drought permits and orders. They should only be used in extreme conditions, and only when all other



steps have been taken to avoid their use. The EA should be working with the water companies, and OFWAT particularly in drier, drought-afflicted areas of England, to make sure that sustainable schemes to source water should be the driver to avoid unsustainable abstraction.

Justin Neal
WildFish
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