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### Blueprint for Water coalition comments on the Water Stress Methodology

The Blueprint for Water coalition believes that the existing classification system has serious flaws, in that it fails to reflect abstraction pressures, environmental sensitivity or climate change projections of future water availability. The new methodology removes most of these flaws, though we would recommend that it be modified to account for water dependent Natura 2000 sites and more local and detailed information available from the Restoring Sustainable Abstraction (RSA) programme and Water Framework Directive (WFD) investigations.

Overall, the Blueprint coalition will continue to call for universal metering, rather than compulsory metering on the basis of the water stressed area methodology.

### **Question 1**

We are proposing to update how we classify areas of water stress to consider the demands on water resources from all sectors of use, including environmental needs. We are also considering future pressures from climate and demand changes. Do you agree? If not, please tell us what other principles you would suggest for classifying areas of water stress and why.

We agree with the proposed update to the classification methodology. We think it will be a considerable improvement to the existing flawed system.

### **Question 2**

Do you agree that keeping the three classifications of water stress (low stress, moderate stress and serious stress) is the right approach? What alternative classification do you suggest?

We support the classification terminology.

### **Question 3**

Do you agree that the local water body stress classification results effectively identify areas of water stress in England and Wales? If not, why?

The approach states that when looking at levels of water exploitation it uses the level that occurs most often in the year within each water body. We would suggest that this is inadequate and would recommend that the methodology also accounts for periods of maximum demand. If a water body can cope with average levels of demand, but can't cope with maximum levels of demand, we would argue that the water body is water stressed.

### Question 4

Our current approach does not take account of existing local investigation work on abstraction impacts. Do you think this should be incorporated into the assessment?

We believe it is extremely important that the methodology adequately reflects the water needs of water dependent protected areas (Natura 2000 sites and Sites of Special Scientific Interest (SSSIs)) and would suggest that additional measures are essential to protect their requirements.

We would also recommend that local RSA and WFD investigations are incorporated into any assessments.

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#### Question 5

Please tell us if you have any other comments you wish to make on our proposed approach for classifying areas of water stress.

The proposed methodology looks to be a very sensible and measured approach that appears to deal quite effectively with future risk.

### **Question 6**

Do you agree that the water company stress classification results are appropriate?

The Blueprint coalition welcomes the new classification results and considers them to be a much more accurate picture of the stress placed on our water environment.

### **Question 7**

Do you agree that the water stress classification results effectively identify areas of water stress in England and Wales? If not, why?

The Blueprint coalition does believe that the methodology accurately identifies water stressed areas. However, we do think that there are some benefits to presenting water stress by water resource zone, particularly in the preparation and presentation of water resource management plans.

### **About the Blueprint for Water coalition**

The Blueprint for Water coalition is a unique coalition of environmental, water efficiency, and fishing and angling organisations that is calling on the Government and its agencies to set out the necessary steps to achieve "sustainable water" by 2015 (<a href="www.blueprintforwater.org.uk">www.blueprintforwater.org.uk</a>). The Blueprint for Water is a campaign of Wildlife and Countryside Link.

This response is supported by the following 10 organisations:

- Amphibian and Reptile Conservation
- Angling Trust
- Buglife The Invertebrate Conservation Trust
- Royal Society for the Protection of Birds
- Rivers Trust
- Salmon & Trout Association
- The Wildlife Trusts
- Wildfowl and Wetlands Trust
- Waterwise
- WWF-UK

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