

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?

ADA (Association of Drainage Authorities)

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:

Flood risk and water level management authorities, including internal drainage boards.

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?

Enter comment here

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?

ADA recommends providing a greater reflection of the interdependencies between different impacts and mitigations, especially within the lowland water environments of areas such as the Fens

ADA recommends providing a better description of regional differences in drought and water stress.

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?

ADA considers that this section provides a broad overview of functions, but lacks sufficient detail. Especially in the case of internal drainage boards, where the document simply describes what these bodies are in a very limited way, without describing what they do before and during a drought event, and their role in supporting the regulation of water resources within lowland landscapes.

The phrase "The Environment Agency may work with IDBs during dry weather and drought" is vague and non-committal, leaving the impression that IDBs are an afterthought rather than a key partner in water management.

The Environment Agency utilises IDBs' knowledge around water levels within lowland areas when it comes to making decisions around abstraction licencing and restrictions. And utilise their knowledge of local pressures and agricultural community to communicate with these groups. ADA wrote a blog back in 2022 giving a brief summary of IDBs' role: <https://www.ada.org.uk/2022/08/managing-lowland-watercourses-in-a-drought/>. But there is more to describe.

ADA recommends providing a clearer description of regional differences in the management of drought and coordination of water resources in this section. This could be in the form of case studies, with examples of best practice.

ADA recommends providing a better understanding of the role of internal drainage boards in facilitating the storage and distribution of water within lowland England, and assisting with voluntary abstraction restrictions in lowland areas, and particularly in the Fens.

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?

Whilst descriptive this seemed to lack the detail we were expecting.

ADA recommends explaining more clearly the role that voluntary restrictions often play in mitigating the impacts of drought within lowland areas (e.g. such as only allowing night time irrigation and/or alternating abstraction days between users within an area).

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?

Enter comment here

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?

ADA recommends providing more clarity in this section around how the Environment Agency work and engage with other risk management authorities, and the triggers for, and extent of, this work.

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?

For a national document about how drought is managed across England, the document currently focuses too singularly on the Environment Agency and insufficiently on the work and interdependencies of other authorities and sectors.

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 answers elsewhere within ADA's response.

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?

Enter comment here

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?

Enter comment here

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

Enter comment here

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?

Enter comment here

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

During the 2022 drought, ADA sought the views from IDBs (<https://www.ada.org.uk/2022/08/managing-lowland-watercourses-in-a-drought>). They highlighted the following strategic matters in lowland areas that need further work including:

- *better coordination of water transfers, reduced licencing of water transfers where these act to reduce the environmental risk of drought to the lowland water landscape,*
- *simplify the process for licencing the storage of winter water by riparian owners, enabling the construction of more reservoirs both for water supply and irrigation needs,*
- *measures to enable, and encourage greater water retention within the ditch network and agricultural soils,*
- *incentivising the creation of more winter storage facilities that are filled during excess rainfall,*
- *greater recognition and legislative underpinning for IDBs' water retention role in lowland landscapes.*
- *a need to improvement how the Environment Agency communicate restrictions to licence holders. This was done via a letter in the post, which takes time to organise, and often letters are not received until the weekend, when farm offices tend to be closed. This leads to uncertainty at the start, with some farmers saying they have not received the letter.*
- *how IDBs can communicate their actions better with the wider farming community. Routine IDB communications typically reach IDB board members, which whilst covering a lot of the landowners, does not cover all. IDBs would welcome support in communicating messages more widely, or guidance to facilitate this, such as use social media effectively, or work with the Environment Agency to set up a telephone message service, similar to that used by the MLC within the Middle Level of the Fens.*
- *better policing of irrigation licences to ensure hand-off levels are being observed.*
- *voluntary restrictions around agricultural abstractions were effective, but consideration was needed about how measures within such voluntary restrictions could be reflected in legislation so that these could become enforceable if anyone was disregarding them.*
- *seek a prompt joined up approach between IDBs and the Environment Agency to check abstractors in certain lowland areas where water levels are dropping off quickly.*