

PROPOSAL - CONSTRUCTION OF IMPOUNDING STRUCTURES AND OTHER ENGINEERING WORKS TO CREATE NEW WATER AREAS, SHALLOW LAGOONS, WETLAND HABITAT AND ANCILLIARY PUMPING SATIONS

COMMENT - BY RUTLAND WATER FLY FISHERS

Reference: FUL/2005/0782

This proposal is intended to mitigate the potential loss of wildfowl habitat at Rutland Water resulting from increased water offtake by Anglian Water (AW) and their proposal to extend the Wing Water Treatment Works (FUL/2005/0783). Rutland Water Fly Fishers (RWFF) have no comment on this latter proposal since it fulfils the purpose for which Rutland Water was built and they accept any resulting increase in draw-down. However, RWFF does have comments on the Mitigation Proposal (FUL/2005/0782) which are set out below. Since our concern is mainly on the impact on trout fishing at Rutland Water our Club is not concerned with the details of on-land work in Areas B & C. However, since many of our members live locally the broader aspects of the whole proposal do affect their interests and are considered also.

#### PRIOR CONSULTATION

Over the past three years RWFF has been consulted by the project managers Halcrow and we have given our opinions at various stages of the plan's development. Our objections to the final proposals for Areas A and D 1 & 2 are recorded in the Proposal at para 5.4.4 and in Impact on Users and Table 5.1. However, it must be stated that none of our objections and suggestions have resulted in any modification to the Halcrow proposals. To briefly summarise our points of view:

Area A Contrary to para 9.3.4(a), there will be no long-term affect on boat fishing since boats are currently barred from the old fishpond area which lies within the Nature Reserve. However, the opportunity has been lost to enhance bank-fishing on scarce East-facing banks by building this bund above top water level and accesible to anglers in the trout season. Note that currently bank anglers do fish from the old fishpond wall when low water levels permit; this advantage will be lost.

Areas D1 & 2 These bunds will prohibit access to some of the best boat fishing water in the whole reservoir, as recorded in para 9.3.4.(d). The bunds being submerged at levels above 85% full means that trout will become trapped in warm shallow water as levels fall. These losses may be made up by increased stocking by AW but in the end fishermen, including RWFF members, will pay for this through increased permit charges.

## GENERAL COMMENT ON THE PROPOSAL

### Bird Numbers

The whole basis of the Mitigation Proposal is the potential loss of duck wintering at Rutland Water in the event of the increased draw-down regime. The case is supported by EU directives of which the legislative and policy context is set out in para 4. The potential numbers of duck which may no longer winter at the reservoir are set out in Table 2.1. Note that these numbers are not of duck fatalities, merely that they may choose to move elsewhere, probably to one of the many suitable waters in the general area. Examples are Eyebrook reservoir (year-round steady water level), fen waters, gravel pits and the proposed reflooding of the fens between Huntingdon and Peterborough. Note also that the proposal rests on the two 'cited species' (para 2.9.2) which are Gadwall and Shoveler, both dabbling ducks. Table 2.1 indicates that the potential loss of these species at 60% full may be Gadwall 1538 and Shoveler 533. Therefore in round terms these potential 2000 duck are the foundation of this whole massive engineering project.

### Cost

Clearly cost is critical to this proposal and is mentioned in para 2.9.4 as a factor in Halcrow's feasibility study. However, as far as we can establish the only cost figure in the public domain is £65 million for the whole project including extension to the Wing WTW and external pipe works. AW are not able to provide the cost of the Mitigation Proposal but it must run to millions of pounds in view of the compulsory purchase of prime farm land and the huge engineering works both on-land and in the reservoir. Taking two ball-park figures for the mitigation work:

Total Cost	£2 million	Cost per potential duck	£1,000
Total cost	£10 million	Cost per potential duck	£5,000

These figures seem out of all proportion to the potential adverse affect on wildfowl whatever the EU directives in para 4 may indicate. Moreover, if OFFWAT consider these costs are essential to water supply they may be passed on to AW customers. Many RWFF members live in the AW supply area or, like those in Oakham, use water direct from Rutland Water and Wing WTW although billed by Severn Trent. Therefore they will be expected to contribute to the cost of a project having adverse affect on their angling opportunity and during construction considerable disruption to their home environment.

### Disruption

Disruption to Angling Disruption to angling is accepted in the proposal. Para 9.5.4.(a) recognises that during construction this will be Moderate Adverse; para 9.4.5.(b) recognises that the long-term affect on angling will be Major Adverse. Particularly with regard to the latter it is regretted that this has not been offset by an easily achieved enhancement of bank angling opportunity. This would be to

make the bund at Area A permanently above top water level and accessible to bank anglers. This would provide angling from an East-facing bank, scarce at Rutland Water, which would remain fishable when strong West winds make much of the banks unfishable through clay erosion and turbidity. Such access would end at 31 October when the bank to the south is closed in the interest of wildfowl. Para 6.9.7 of the Environmental Assessment report under Fishing states: 'Boat fishing is adversely affected when water is 4.5m from maximum at which point boats cannot be launched from the Fishing Lodge harbour. Instead boats are launched from Whitwell'. This would introduce huge logistic problems in separating boats from: the office and shop; the fuel supply and engineering facility; and from other facilities. Fortunately this fall-back measure has so far never been instituted but in the event of greater and more frequent draw-down it would become an intolerable burden to fishery management. In this event the only practical solution would be to dredge out and deepen the Lodge harbour to permit continued boat access at levels below 4.5m.

Disruption to Wildlife Work on Areas A and D is scheduled from Feb-Aug during the early part of which over-wintering Gadwall and Shoveler and many other duck are present. With up to six floating crane barges, pile-driving, stone placemnt and regular traffic of supply barges, disturbance to wintering birds and spring nesting is inevitable. While this is recognised in the proposal we find its ready acceptance in great contrast to the attitude of English Nature in frequently opposing the full opening of the trout angling season on Rutland Water a few days early in those years when there is an early Easter holiday in late March. To allow this would get the season off to a great start and enable AW's Fishery Manager to make a useful profit, to the benefit of the fishery and all our members who use it.

Disruption to Populace Besides permanent loss of excellent farm land the implementation of this proposal will introduce great temporary disruption to the local populace, including many RWFF members. For instance, work on Area D in Feb-Aug 2009 is shown in Table 3.4 to require some 18,256 two-way road movements, most of them heavy lorries carrying rock and steel shuttering. The site compound at Sykes Lane will undoubtedly inconvenience tourists and local visitors while barge traffic up and down the full length of the South Arm will disrupt boat angling and sailing. It seems probable that for the period of construction work the area will be less attractive to tourists, to the detriment of local businesses. While some of these factors are recognised in the proposal document it will be no recompense to local populace, including RWFF members, who will in due course as AW customers most probably have themselves to pay for the disruptive work, as already discussed under Cost.

Disruption to Water Supply Para 3.4.4.(b) states that work on the bunds on Areas A and D, which will start in February 2008 and 2009 respectively, would begin with the reservoir at 85% full. AW normally plan that it should be at top level, 96% full, at the beginning of May each year. Thus the proposal would appear to mean that in these years the water would be deliberately lowered early in the Spring thus

risking either a drought situation (hosepipe bans etc) in the event of a dry summer or else an extraordinary summer draw-down to maintain supplies, to the great detriment of all reservoir users and to wildfowl in the following winters.

#### CONCLUSION

The Mitigation Proposal (FUL/2005/0782) rests on the EU regulations set out in its para 4 yet the massive engineering projects, with heavy costs and local disruption, seem out of all proportion to any potential harm to wildfowl caused by increased draw-down of Rutland Water to maintain essential water supplies. This is that some 2000 of the cited species, Gadwall and Shoveler, may relocate to the many available waters in winter following such draw-down. RWFF were consulted by Halcrow and have given its opinions at various stages of the project's development. These are recorded in the Mitigation Proposal but have had no influence on its final proposals. The project will lead to long term Major Adverse affect to angling interests. It will lead to great local disruption over several years and, to add insult to injury, it is likely, if OFFWAT agrees, that local AW customers, including many RWFF members will have to contribute to the cost of the project through their water and/or sewerage charges.