# RESPONSES TO 'OUTLOOK FOR THE ENVIRONMENT'

A summary of the responses to the Environment Agency's consultation on the priorities for investment by water companies in environmental improvements as part of the Periodic Review

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**April 1998** 



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### **ACKNOWLEDGEMENTS**

The Environment Agency would like to thank all those organisations and individuals that responded to the consultation exercise 'Outlook for the Environment', by either completing the proforma or providing detailed written responses. The extent, breadth, and speed of the response demonstrates a keen interest of individuals and organisations in the environment. A list of the organisations and individuals that responded is shown in Appendix 1.

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### **EXECUTIVE SUMMARY**

The 'Outlook for the Environment' consultation paper was issued in January 1998 by the Environment Agency to more than 200 organisations who have an interest in the review of water companies' price limits (The Periodic Review). This document summarises the responses the Environment Agency received and draws some broad conclusions from their comments.

A key objective of the Environment Agency for the Periodic Review is to recommend to the Secretaries of State for the Department of the Environment, Transport and the Regions (DETR) and for Wales, a National Environment Programme (NEP) which meets UK and European legal requirements and will result in significant environmental improvements in England and Wales.

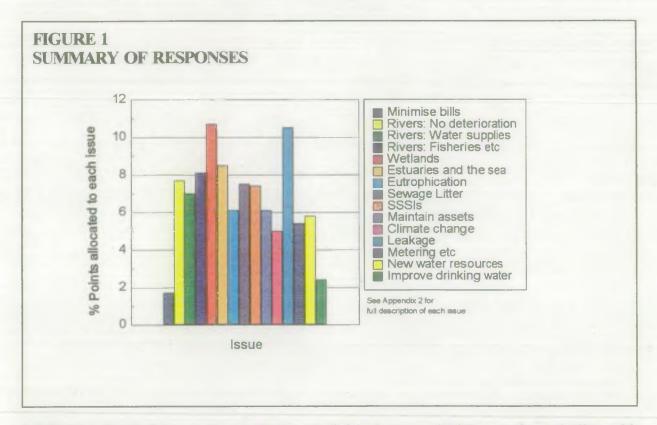
The aim of 'Outlook for the Environment' was to raise awareness of the importance of environmental issues within the Periodic Review, to set out objectively the main reasons why environmental improvements are needed and to seek views on the priorities for investment.

The Agency sent out over 200 letters and received over 160 responses from a number of organisations and individuals, including water companies, consumer organisations, interest groups, and the Agency's statutory Committees; half the responses were from groups and the other half from individuals. Nearly all the responses welcomed the opportunity to comment. About a third put forward their views in detailed written responses, whilst over 100 respondents completed a summary proforma, (please see Appendix 2).

The proforma invited the consultees to allocate 100 points between 15 issues, indicating their preference for each environmental improvement. A more detailed breakdown of the results is set out later in this document. A more detailed summary of the methodology used can be read in Section 2. All the organisations that received the original document will be sent a summary of the key findings.

Key elements of the findings will also be summarised in the Agency's open letter to the Secretaries of State in May, which sets out our broad proposals for the National Environment Programme. The results of the consultation will help to provide a more detailed understanding of the extent and breadth of interest that the above organisations have in the need for environmental improvements.

Taken together, the responses broadly indicate that people want to see environmental improvements to our coasts, estuaries and inland waterways and that no single issue is dominant. Figure 1 shows a summary of the responses.



Of the 15 individual issues, the two highest individual scorers (10%) were those dealing with leakage and wetlands. The consultees gave the need for keeping bills low and improving the quality of drinking water at the tap the lowest priority rating of 1.7% and 2.4%.

'Outlook for the Environment' is the second stage of a national consultation process which follows market research carried out during October 1997, by NOP Political and Social, to 'establish the importance to water company customers of protecting and enhancing the environment'.

The next stage for the Agency in the Periodic Review process will be when it issues its guidance to the Secretaries of State on the broad priorities for environmental improvements. This report 'A Price Worth Paying' will be published in May 1998.

### INTRODUCTION

This document sets out background information on the Periodic Review and the Environment Agency's role, and summarises the feedback from the Agency's consultation 'Outlook for the Environment'.

### The Environment Agency

The Environment Agency's vision is 'to provide a better environment for England and Wales both for present and future generations'. It is required by Government to help achieve the objective of sustainable development and has a wide range of duties and powers which it uses to help reach this goal.

### The Periodic Review

Every five years water price limits for customers in England and Wales are reviewed by the Office of Water Services (Ofwat). The current review will be finalised in November 1999 and will set the price limits which water companies may charge their customers from 2000 to 2005.

The prices set by this review will take into consideration a number of factors including the investment needed to maintain company assets; potential efficiency savings; improvements to drinking water; measures to meet growth in demand for water and the investment required to protect the environment.

### National Environment Programme

As part of the Periodic Review, it is the Environment Agency's role to advise Government on the programme of environmental improvements which need to be carried out by each water company. The approved programme is called the National Environment Programme (NEP).

The Agency is keen to ensure that all organisations and individuals that have an interest in the environment and water should be given the opportunity to influence the type of environmental improvements that need to be made. The programme will include measures to put right the damaging impacts on rivers and wetlands of water abstraction, as well as improvements to water quality of coastal waters, rivers and lakes.

The aim of 'Outlook for the Environment' was to provide interested organisations with background information on the Periodic Review and to give them the opportunity to help identify the environmental priorities and benefits of improvements for the National Environment Programme from a range of options. The Agency sent 'Outlook' to a number of interested organisations and its statutory committees - eight Regional Environment Protection Advisory Committees (REPACs), eight Regional Fisheries Advisory Committees (RFACs), and 26 Area Environment Groups (AEGs).

### Timescale and programme for the Periodic Review

The Agency will in May 1998, publish its advice to Government on the broad priorities and benefits for investment in the environment. Around the same time, Ofwat will set out the likely costs of the programme and its possible impact on prices.

The public will then be given the opportunity to comment to Government on the information provided by Ofwat and the Environment Agency before the Government gives its initial guidance in July 1998.

The Agency will then begin to identify and prioritise the individual environment improvement schemes for each of the individual water companies in line with the Government's guidance. These programmes will be published by the Agency in November 1998. At that stage, there will be a further opportunity for representation from interested parties, before the Government makes decisions on the environment programme for each water company in March 1999. Further adjustments may then follow in October 1999, when the Secretaries of State make final decisions on the composition of the National Environment Programme.

## **METHODOLOGY**

As part of its involvement in the Periodic Review, the Environment Agency, is consulting a number of organisations and individuals to assess their views on the priorities for environmental improvements. The Agency's first consultation was conducted by NOP Political and Social to 'establish the importance to water company customers of protecting and enhancing the environment'. The results were published in December 1997 and demonstrated that given the choice, 95% of customers would prefer to pay the same amount for their water to ensure that environmental improvements were made rather than see a one off cut in their bills.

The Agency was then keen to build upon this research and gain a more in-depth and structured understanding of the type of environmental improvements and their benefits, that organisations and individuals were interested in and their relative importance.

Many responses were detailed written contributions from a clearly informed perspective. Consultees were also invited to allocate 100 points across a range of environmental improvements according to a list of issues which broadly covered the Environment Agency's range of responsibilities. These are presented in Appendix 2. In taking this approach, the Agency was attempting to mirror the reality of matching limited resources to a range of issues. In addition, the Agency wanted to consult with a wide range of organisations, in order to gain an informed understanding of people's views. Due to the wide variety and volume of organisations this made focus groups impractical, and a postal survey provided the qualitative solution.

This type of survey is not intended to be statistically robust, it is simply the opportunity for different organisations to present their views on the environmental priorities and benefits - whether by written submission, the allocation of points or both. These views can then help to shape the NEP which will be submitted to the Secretaries of State in May 1998.

A number of tables have been produced to illustrate the results, these are shown in Appendix 3.

#### SUMMARY OF RESPONSES

The following section sets out on an issue by issue basis a summary of each of the responses. This section is structured by providing a statistical breakdown of the responses, and supporting these with quotes from some of the written responses.

Generally, the majority of respondents were very supportive of the consultative approach that the Agency has taken towards the National Environment Programme as part of the Periodic-Review. Although they recognise this process is not statistically robust, they see this process offers the opportunity to influence the NEP at an early stage.

For a full list of the questions, please see Appendix 2.

1. Only the minimum environmental improvements required by law should be carried out to keep bills as low as possible.

Very few organisations actually attributed a score against this question, giving it the overall lowest priority scoring of 1.7%. Those that did score this issue were mainly from the Ofwat and its Customer Service Committees. For those that provided written responses the following said:

"The Customer Service Council (CSC) has voiced concern in the past about the effect rising bills has on those on fixed on low incomes. Prices are rising well above the rate of inflation and customers in this particular category are having great difficulty in meeting these increased costs. This continues to be our major concern."

Ofwat North West CSC

"The CSC is of the view that ... it was implicit that the benefits of privatisation would be passed back to customers at the end of the five year price review."

Ofwat Wessex CSC

"The identification and broad examination of the key environmental issues ... is most helpful, especially for members of the public....

.... the way in which respondents have been invited to express their views and set down priorities is interesting and innovative. We would however .... urge caution in the interpretation ... the responses will be self-selecting .... "

Ofwat

By contrast a larger proportion of organisations actually stated that they did not want to see a reduction in bills:

"... a reduction in bills not only will fail to secure environmental improvements but will also fail to send the correct economic signals in an area where water resources are relatively scarce ..."

Mid Kent Water plc

"The Wildlife Trusts would like to see reductions in customers bills but only if this does not prejudice the investment needed to meet environmental needs."

The Wildlife Trusts

2. We should underpin recent improvements in river quality by preventing deterioration. Rivers that have deteriorated of late should be restored to their former condition.

This is the first in a series of three questions which address the question of river quality. The priority weighting that respondents gave this question was 7.7%

For example, some of the written comments expressed their strong interest in this as an issue:

"The Government should press on with a scheme for setting statutory water quality objectives for rivers...."

Eye on the Aire

"There has been significant underspending on the water supply and sewage disposal infrastructure for a great many years. Despite improvements following privatisation of the water industry, water quality over large areas remains inadequate, and river flows and still water levels continue to suffer from over abstraction from ground and surface waters.

"These effects have been exacerbated by other activities such as land drainage, flood defence, navigation and development. The result is that fisheries and wetlands and their associated wildlife and habitats remain degraded or are unable to realise their full potential."

National Association of Fisheries & Angling Consultatives

3. Rivers of poor quality should be improved, especially those with potential for use as water supplies.

The purpose of this question, was to build upon the information from question two, and ascertain respondents reasons for the need for improvements in river quality. Respondents gave question three a priority rating of 7.0% demonstrating their interest in improving river quality with the intent that this will lead to increased potential for water supplies.

"Water quality (though much improved) still needs improving and increasing abstraction and drought is pressurising our water supplies."

Kent Wildlife Trust

4. Rivers of poor quality should be improved, especially those with potential for use as fisheries, or to enhance recreation and conservation of wildlife.

Improving rivers of poor quality takes a high priority scoring of 8.0% giving a strong indication that investment is needed to improve river quality as well as sustaining it at current levels. Respondents reasons for this could be interpreted as being that their priorities are for the conservation of wildlife, fishers, and enhancing recreation in addition to water supplies.

"... according to the UK Day Visits Survey (1994), over 400 million visits are made to inland waterways per year. The future of these habitats and features must therefore be safeguarded, both for the benefit of the public and for their intrinsic heritage and wildlife value."

The Inland Waterways Association

5. Rivers or wetlands damaged by over-abstraction should be restored, especially where this is a benefit to recreation and conservation.

Questions five and nine addressed the issue of the impact of over abstraction on the environment. Question five achieved the highest priority scoring of 10% strongly indicating that all rivers and wetlands damaged by over abstraction should be restored especially where this is a benefit to recreation and conservation. Again, a wide range of organisations supported investment in this:

"Reductions in bills should not prejudice the investment needed to meet environmental needs. The progress to date on improving water quality and alleviating low flows illustrates what can be done with investment from water companies."

Dorset Wildlife Trust

"Taking currently approved plans together with County Council projects to the year 2011, Hampshire could find itself supporting a further 94,000 households or more! If the effects of current abstraction rates together with water loss through leakage and drought already cause visible deterioration for river and wetland habitats, what chance do they have in the future?"

Council for the Protection of Rural England Hampshire Branch

6. Companies should do more to further improve discharges to estuaries and the sea.

This also achieved a very high priority rating of 8.5%.

Further comments highlighted the importance of this issue:

"The Board ... is very concerned to encourage improvements to the natural environment within Wales, as part of the natural resource upon which the country's tourism appeal is based ... The Board was a founder member of the Green Sea Partnership. The principal aim of the Green Sea Initiative is to harness "the powers of partnership to create real improvements in the quality of the Welsh Coastal environment" ... Visitor research indicates that water quality is a major concern of beach users. We would therefore, from a tourism perspective, accord a very high priority to further improving discharges to estuaries and the sea. Of equal importance, companies should ensure that no sewage litter is allowed to get into rivers or beaches."

Wales Tourist Board

"Our clear priority is to see an improvement in the standard of sewage discharges into estuaries and coastal waters."

The Shellfish Association of Great Britain

"Our own top priority with regard to tourism is to ensure that all bathing beaches around the country are cleaned up and that the quality of bathing water should be up to or above EU standards."

English Tourist Board

7. Companies should do more to control eutrophication in lakes, reservoirs and rivers.

Respondents gave this question a priority rating of 6.1%.

"We further welcome specific mention of "eutrophication". Limits on phosphate and nitrates are not generally included in consent conditions for sewage works in England Wales. These elements stimulate algal growth and are viewed by English Nature as the main cause of deterioration of plant and animal communities in river and lake SSSI's".

English Nature

8. Companies should ensure that no sewage litter is allowed to get into rivers or on beaches.

This question received a priority rating of 7.5%.

"It has been found that in storm conditions the sewage works are not capable of processing the additional sewage and the result is that the untreated sewage is passing over the storm overflows. The untreated sewage is left on the surrounding land or in the water courses. The natural sewage will break down but the condoms and other personal hygiene items are left, affecting animals and man alike as well as polluting the environment."

Dales Area Environment Group Member

"We should obviously like to see all of our Bathing Waters brought up to the highest standard as soon as possible but realise that the solutions to long term inherited pollution are not simple. Recent experience has shown that only when all coastal sewage is treated to an acceptable standard can we begin to investigate other sources of pollution be they be from illicit sewer connections, agricultural or industrial discharges."

Keep Wales Tidy Campaign

9. A precautionary approach should be taken to protect Sites of Special Scientific Interest where the effects of abstraction or discharge are uncertain.

This question examined attitudes to the importance of protecting our most important sites of conservation. The respondents gave this a priority rating of 7.4%.

"The environment must be at the heart of decisions taken during this review. It is essential that the amount allocated to environmental improvements is sufficient to meet the requirements identified by the Environment Agency and statutory nature conservation bodies to protect bio-diversity through improvements to water quality and the removal of the impacts of abstraction."

Royal Society for the Protection of Birds

10. Companies should ensure their assets are maintained to a higher level and so reduce the numbers of fish kills, accidents and other incidents and to prevent the recurrence of high leakage.

The respondents gave this a priority rating of 6%.

"WaterWatch believes that more should be done to ensure protection of the freshwater habitat from over abstraction during drought."

**WaterWatch** 

11. Special precautions need to be taken to protect our water resources to deal with the uncertainty of climate change.

Question eleven is the first in a series of four questions which all examine the potential impact that climate change and other factors could have upon the way in which limited water resources are managed in the future. This first question received a priority scoring of 5%, which compared with other scores; indicates respondents general feeling that planning and investing for future water resources was important. The following questions set out the priorities for investment in managing water resources.

## 12. Companies should reduce to the minimum level practical the amount of water lost in leaks in water mains.

Question 12, along with over abstraction affecting wetlands, achieved the highest individual prioritisation scoring of 10%. Investment in managing leaks to ensure the good management of future water resources was therefore considered by respondents a top priority.

"Our early focus group research indicates that customers' main priorities are for: ... a high degree of efficiency and forward planning, particularly with regard to water resources, and .... environmental protection for ... rivers, and the sea and beaches ..."

Southern Water

".... the first priority has to be a reduction in wastage (of water) .... "

Southern RFAC Member

## 13. Every home should be metered to discourage wasteful use of water.

This question was given a priority rating of 5.4% for investment strongly indicating that by contrast to leakage which had a twice as high a rating, respondents considered that it was the responsibility of the water companies to manage the demand for water through reducing leakage as against the consumer.

14. Companies should develop new water resources, such as reservoirs, in order to meet the future demand for water.

This question again received a much lower priority rating, compared to twelve, of 5.85%, suggesting that investment should again be prioritised on controlling leakage.

15. Companies should do more to improve the quality of drinking water at the tap.

This received a very low prioritisation rating of only 2.4%. This could be partly due to the nature of the organisations that responded.

"our early focus group research indicates that customers' main priorities are for: a continuous, uninterrupted and unlimited supply of good clean drinking water a reasonable price...."

Southern Water

We have tried to quote from a fair representation of the organisations and associations that responded to the survey. If you require any further information on the written detailed responses please write to: Richard Streeter, Head of Periodic Review, Environment Agency, Rio House, Waterside Drive, Aztec West, Almondsbury, Bristol BS32 4UD.

#### APPENDIX 1

#### Wildlife & Countryside

English Heritage Royal Society for the Protection of Birds English Nature Joint Nature Conservation Committee Council for the Protection of Rural England Council for the Protection of Rural England - Hampshire Council for the Protection of Rural England - Dorset Branch Council for the Protection of Rural England - Worcestershire Sally Craig, Council for the Protection of Rural England - Witney Area Committee Margaret Hunt, Council for the Protection of Rural England - Avon Branch Elizabeth Money-Kyle, Council for the Protection of Rural England - North Wiltshire (Member) Suzanne Walker, Council for the Protection of Rural England - Essex (Member) Dr Alan Woods, Country Landowners Association National Office, The Wildlife Trusts Cumbria Wildlife Trust Kent Wildlife Trust Somerset Wildlife Trust Worcestershire Wildlife Trust Norfolk Wildlife Trust Yorkshire Wildlife Trust Dorset Wildlife Trust The Lincolnshire Trust for Nature Conservation The Otter Trust HE Wraight, The Herpetological Conservation Trust The Natural Step, Cheltenham Devon Conservation Forum

#### Local Authorities

Uttlesford District Council
Great Yarmouth Borough Council
Caradon District Council, Cornwall
North Yorkshire County Council

#### Environmental Groups

North Sea Action Group of Norwich and Broadland Friends of the Earth Keighley Friends of the Earth Mr John Garside, Public Action for Water Supplies (PAWS), Huddersfield Newlay Conservation Society, Leeds Eye on the Aire, Leeds Greta McDonough, Norwich SERA and Friends of the Earth River Wharfe Restoration Group Forum for the Future

#### Anglers

National Federation of Anglers
National Association of Fisheries and Angling Consultatives
Birmingham Anglers Association Limited
Cymdeithas Genweirwyr Eog a Brithyll Cymru (Welsh Salmon and Trout Angling Association)
Wiltshire Fishery Association
Hertford Angling Club
Peper Harow Park Flyfishers Club
The Severn Fisheries Consultative Council (representing 60,000 anglers)
Abbey Cross Angling Society, Hertford
Wilton Fly Fishing Club, Wiltshire
The Leeds and District Amalgamated Society of Anglers
Mr A Millett, Wey Valley Fisheries Consultative Association (Member)

#### **Ofwat**

Ofwat
Ofwat (Northumbria Customer Service Committee)
Ofwat (Wessex Customer Service Committee)
Ofwat (North West Customer Service Committee)

### Water Companies

South West Water
Folkstone & Dover Water Services Limited
North West Water
Wessex Water
Wessex Water (two separate responses received)
Three Valleys Water
Thames Water Utilities
South Staffordshire Water
North Surrey Water Limited
Southern Water
Dwr Cymru Welsh Water
Mid Kent Water
Yorkshire Water Services Limited

### Other Organisations

BWRDD Croeso Cymru (Wales Tourist Board)
English Tourist Board
The Shellfish Association of Great Britain
St Regis Paper Company Ltd
Consumers' Association
Inland Waterways Association
English Sports Council
Cadwch Gymru'n Daclus (Keep Wales Tidy Campaign)
Institute of Freshwater Ecology, Cumbria
Institute of Freshwater Ecology, Wareham
Winchester College, Hampshire
Centre for Environmental Technology, Imperial College
Royal Geographical Society

#### Agency Committee Members

Brian Clarke, Member RFAC Southern Dr Julia Robson, Member Southern Region RFAC A Richards, Member of Anglian RFAC Ken Haines, Gloucestershire, Member of Midlands RFAC K Fisher (British Waterways) Member of Midlands RFAC Gordon Topp, Wiltshire (RFAC Member SW Region) John Roberts (Anglesey County Council, Welsh REPAC) Rachel Ross, Dales Area AEG T Williams, Member of Wessex AEG Mr Preston, Member of Norfolk and Suffolk AEG Stuart J Gardiner, Member Cornwall AEG J R Littlefair, AEG Member, Dales Area Laura Hirst - South West Wessex AEG & Friends of the Earth Audrey Lennox, North Wessex AEG Norfolk and Suffolk AEG Member G R Steel, The Felixstowe Dock and Railway Company, Norfolk & Suffolk AEG Member Doug Rainbow, Member, Tees, Esk and Coat AEG T C A Diggle (Global Environmental Waste Management Services), Member North Yorks AEG M Hellings (Haul Waste), Member North Wessex AEG Lindsey Fortune (Courtaulds), Member North Wessex AEG lan Cook, Member Devon AEG Norfolk and Suffolk AEG Member F Shephard, Norfolk and Suffolk AEG Norfolk and Suffolk AEG Member T G Jolley, Norfolk and Suffolk AEG Member Norfolk and Suffolk AEG Member Norfolk and Suffolk AEG Member Norfolk-and-Suffolk AEG Member Norfolk and Suffolk AEG Member Norfolk and Suffolk AEG Member Norfolk and Suffolk AEG Member Dr MJ Pemberton, AEG Member, Cornwall Iris Webb, Norfolk and Suffolk AEG Member

#### Members of the Public

Brenda Lalonde, Bristol
Wendy Butlin, Leeds
Mr & Mrs Parish, Cornwall
R Thomson, Yorkshire Water Watch
John Hume, York
Mrs Rosemary Suttill, York
Confidential (name given)
Graham Carey, West Yorkshire
Miss P Johnson, Leeds
Claire Nash, Leeds
Ken Briggs, Huddersfield
Derek A Brook, Yorkshire
Peter M Peel, West Yorkshire
No name supplied
No name supplied

No name supplied Kevin Sunderland, West Yorkshire No name supplied Penny Ward, West Yorkshire Mr Plumber BD16 Sian Dodderidge, Leeds Elaine Hopkinson, North Yorkshire Mr RW Berry, Cartmel Fell Ms A Kar, Norwich K Atkinson (North West) Helen Villings, Leeds Bob Scott (Friends of the Earth) Lynda Ryalls (Friends of the Earth) Gary (Friends of the Earth) Derek English (Friends of the Earth) Graham (Friends of the Earth) David Braidley (Friends of the Earth) Angela Pooley (Friends of the Earth) Jenny O'Connor (Friends of the Earth) Signature obscured, York DG Nunns, York WP Reece, Sussex

## APPENDIX 2

# COPY PROFORMA AS IN THE CONSULTATION PAPER - SUMMARY OF ISSUES TO BE PRIORITISED

ITEM	ISSUE	POINTS
1	Only the minimum environmental improvements required by law should be carried out to keep bills as low as possible.	
2	We should underpin recent improvements in river quality by preventing deterioration. Rivers that have deteriorated of late should be restored to their former condition.	
3	Rivers of poor quality should be improved, especially those with potential for use as water supplies.	
4	Rivers of poor quality should be improved, especially those with potential for use as fisheries, or to enhance recreation and conservation of wildlife.	
5	Rivers or wetlands damaged by over-abstraction should be restored, especially where this is a benefit to recreation and conservation.	
6	Companies should do more to further improve discharges to estuaries and the sea.	
7	Companies should do more to control eutrophication in lakes, reservoirs and rivers.	
8	Companies should ensure that no sewage litter is allowed to get into rivers or on beaches.	
9	A precautionary approach should be taken to protect Sites of Special Scientific Interest where the effects of abstraction or discharge are uncertain.	
10	Companies should ensure their assets are maintained to a higher level and so reduce the numbers of fish kills, accidents and other incidents and to prevent the recurrence of high leakage.	
11	Special precautions need to be taken to protect our water resources to deal with the uncertainty of climate change.	
12	Companies should reduce to the minimum level practical the amount of water lost in leaks in water mains.	
13	Every home should be metered to discourage wasteful use of water.	
14	Companies should develop new water resources, such as reservoirs, in order to meet the future demand for water.	
15	Companies should do more to improve the quality of drinking water at the tap.	
16	Other (please specify)	
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## APPENDIX 3

## Summary figures of proforma responses

Figure 1 - All Respondents

Figure 2 - Wildlife & Countryside

Figure 3 - Local Authorities

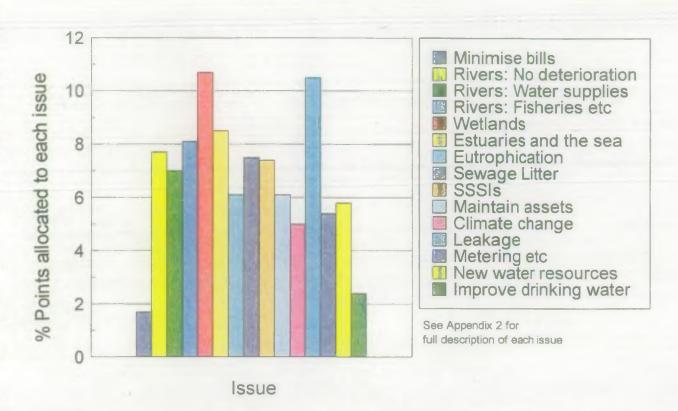
Figure 4 - Angling

Figure 5 - Environmental Groups

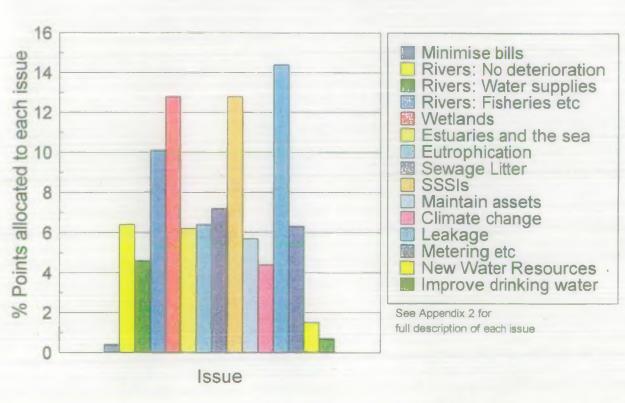
Figure 6 - Water Industry

Figure 7 - Agency Committee Members

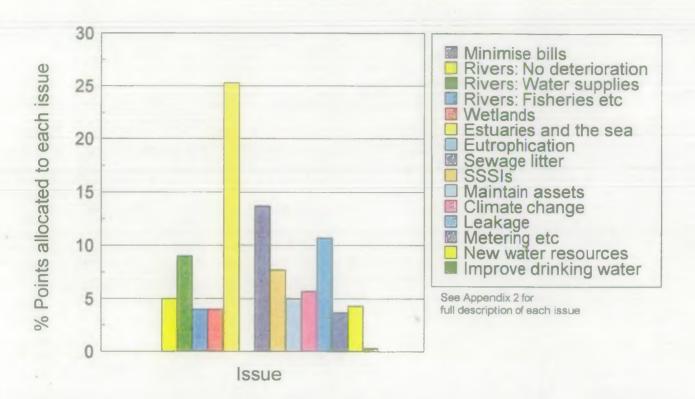
## All Respondents



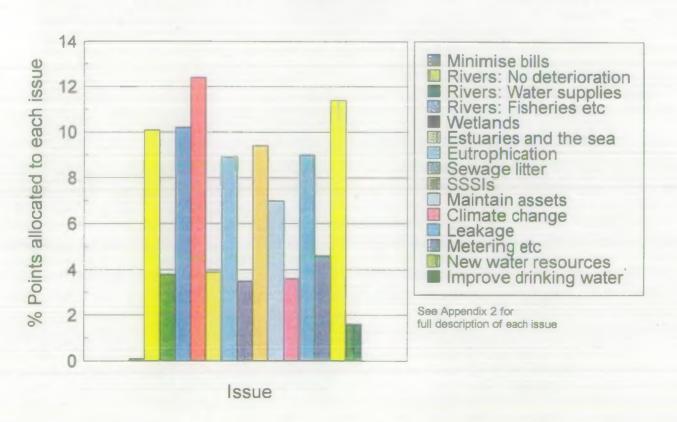
## Wildlife & Countryside



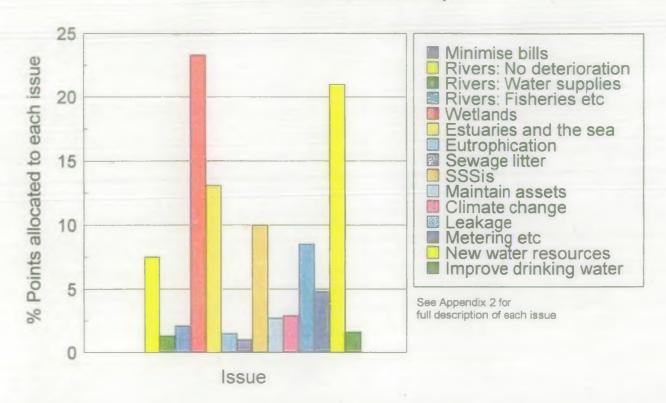
## **Local Authorities**



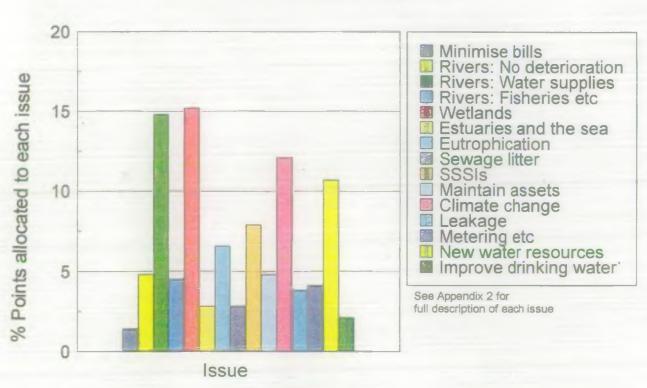
## Angling



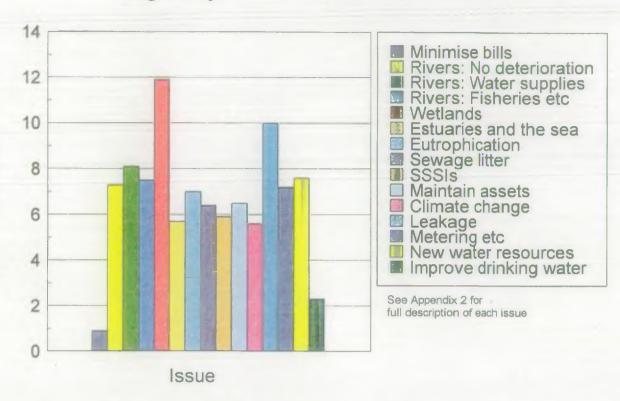
## **Environmental Groups**



## Water Industry



## **Agency Committee Members**



% Points allocated to each issue

