

16 March 2026

IWA Response to South East Water's Consultation on Broad Oak Water

The Inland Waterways Association (IWA) is the membership charity that works to protect and restore the country's 7000 miles of canals and navigable rivers. IWA is a national organisation with a network of volunteers and branches who deploy their expertise and knowledge to work constructively with navigation authorities, local and national government and other organisations. The Association also provides practical and technical support to restoration projects through its Restoration Hub.

IWA thanks South East Water for the public webinar on 12 February and the opportunity to respond to the consultation. IWA has the following comments.

1. General

There is a right of navigation on the tidal River Stour from the sea at Pegwell Bay to Fordwich, and possibly further upstream to Canterbury. In recent years this length of the river has suffered from two significant problems, eutrophication and siltation. IWA considers it important that studies undertaken prior to implementation of Broad Oak Water should demonstrate that the scheme will not make the situation worse and, ideally, will lead to some improvements.

On a related point, the 2002 Catchment Area Management Strategy demonstrated a trend of reducing rainfall across the catchment and thus reducing flow in the river. That analysis should be re-addressed with more recent data and the studies for the reservoir abstractions (and related eutrophication and siltation) should take such trend into account.

2. Eutrophication

Problems in the early 2000s were caused by over-abstraction from aquifers upstream of Grove Ferry and downstream of Ashford, coupled with nutrient rich effluent discharged from Herne Bay STW and several small STWs downstream of Ashford.

The effect of over-abstractions was to occasionally reduce net flow at Grove Ferry to below the 'Hands Off Level'; preventing further abstraction and making the tide the largest influence on a very low flow. An unexpected effect was a saline slug along the river-bed up to the SSSI Stodmarsh Nature Reserve where it damaged the reed beds and dependent species. To stop this problem a pipeline was constructed from (the coastal) Herne Bay STW to discharge at Grove Ferry. On opening it was observed to be discharging effluent that was markedly darker than the 'native' water and was also warmer. The warmth and nutrients encouraged abnormally strong weed growth that raised the riverbed, hindering navigation.

The Environment Agency water quality designation became "Sensitive area (Eutrophic)". Subsequently, ferric chloride dosing was installed at some smaller STWs downstream of Ashford. That remains the present situation.

Responses to a question on this topic during the webinar were, naturally, rather general but did indicate some impacts. In IWA's opinion the scheme should include sufficient mitigations, such as improved sewage treatment discharge quality, to ensure impacts are positive rather than negative.

3. Siltation

The tidal River Stour is an unmanaged river. However, it is apparent that without some form of management organisation its continued use will become more difficult over time with silting up, problems removing obstructions to navigation, and the resulting narrowing of the navigable waters as depths reduce. Climate change, with reducing summer flows, may also have an adverse impact in future. Early moves to set up a river users trust are being talked about in some circles.

There was no specific response to a question on this topic during the webinar. In addition to studies to demonstrate that transfers from the river to the reservoir will not increase siltation (through decreased flushing at times of abstraction) or otherwise adversely affect navigation, IWA would encourage South East Water to take an active role in future management of the navigable river to address these issues.

4. Inlet and outlet structures on the river

Inlet and outlet structures should be designed to limit transverse flows across the river which may adversely affect navigation. The Canal & River Trust's "Code of Practice for Works Affecting the Canal & River Trust" and the Lock Design Manual (2014) published by the Ministry of Transport, Public Works and Water Management (Netherlands) both provide useful guidance on matters to be considered and addressed in such designs.

5. Emergency discharge from the reservoir

When considering operation of the emergency discharge from the reservoir, studies should identify what restrictions need to be placed on river usage (including navigation), for what distance downstream from the reservoir, and how such restrictions would be communicated to river users, potentially at short notice.

6. Recreational facilities

IWA supports the proposed provision of recreational facilities at the reservoir.

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