

Sir James Bevan
Chief Executive
The Environment Agency
2 Marsham Street,
London, SW1P 4DF



September 2020

Dear Sir James
Cc Emma Howard Boyd, Chair, Environment Agency

Re: The future of our freshwater environment

The rivers of the Colne Catchment are well cherished by the communities they flow through, historically offering local people a place to catch the fish of a lifetime; an area where they could learn to swim; an opportunity to see rare wildlife, and the ability to navigate through the countryside to the peripheries of West London.

From internationally rare chalk streams and SSSIs, to canals, rivers and wetlands, the Colne Catchment is an important blue landscape now on the brink of decline. Today, the catchment faces unprecedented challenges and robust regulation and tangible enforcement is urgently required if the continuing trend of ecological deterioration is to be reversed.

We welcome elements of your recent speech focusing on the importance of regulation, but were deeply concerned by the proposal we firmly believe will weaken the criteria of the Water Framework Directive. At the heart of the Directive is the principle that the water environment is a system, and all parts of that system need to be in good working order for it to operate effectively. In our view, the abandonment of certain criteria is merely a means of lowering the bar to make good status easier to achieve, when it should be a method of genuinely improving the way we monitor and improve the quality of our waterbodies.

The issues facing those waterbodies need to be tackled at both national and local level. We fully support the 20th August letter from Wildlife & Countryside Link relating to the national issues, and write to specifically highlight some of the local issues:

Water Quality

The main criteria for waterbodies not achieving good status are point source pollution caused by domestic misconnections, and Combined Sewerage Overflows. There is a desperate need for new national policy to ensure water companies actively and properly address these issues.

The catchment also suffers from the repeated release of raw sewage under license from the Environment Agency. Recently, there has been a disturbing trend to enable water companies to self-regulate the monitoring of discharges from sewage treatment works. We have already observed the consequences of this: numerous pollution incidents recorded across the catchment, with few, if any, repercussions. In fact on the Chess there have been at least 50 events in 2020, unfortunately under SOAF the EA count them as one.

Water Quantity

The Colne is a water-stressed catchment thanks to over-abstraction and climate change. Many of the chalk stream tributaries are increasingly dry for many miles, and other rivers suffer from extremely low flows and rely on augmentation from the discharge of sewage treatment works.

The depletion of the aquifer due to high water demand also results in the deterioration of many important floodplain habitats that serve to increase the resilience and overall biodiversity of the

river network. Local environmental groups are working with water companies on awareness campaigns to reduce demand but more needs to be done. We also need to find sustainable ways to improve supply.

Invasive Non-Native Species

The catchment is home to numerous INNS including historically established species such as Himalayan Balsam, Japanese Knotweed, Giant Hogweed and Signal Crayfish; more recent threats include Floating Pennywort and Demon Shrimp.

Despite the best efforts of the catchment partnership to provide a co-ordinated approach there is insufficient funding and levels of enforcement to ensure landowners take their legal responsibilities seriously. Unless there is a step change, invasive species will continue to proliferate and our waterways are becoming increasingly compromised in the meantime.

Development

This catchment, particularly in the south, is amongst the most threatened landscape of its type in the whole country. HS2 construction work is already devastating large areas, Heathrow expansion proposals (the February court ruling is welcomed, but Heathrow Airport Ltd is still pushing for expansion) would concrete over four rivers and divert one more through a landfill site, effectively severing the internationally-rare chalk streams of the Chilterns from the Thames.

Crucially, local communities are 'hosting' these developments for 'the greater good' of the nation, but with absolutely no local benefit.

There are also many other development proposals – including housing allocations in emerging local plans from the multitude of Local Planning Authorities covering the catchment – that will compound the critical Water Quality issue outlined above.

The planning process also highlights the inadequacies of environmental law in the face of large scale development. It would appear the requirements of WFD can be overridden if the demand for new infrastructure is sufficient. This is deeply demoralising for catchment partnerships doing their very best to deliver WFD.

Large scale infrastructure projects also represent a disproportionate drain on a catchment partnership's resources, meaning that their focus shifts to preventing the deterioration of a catchment, as opposed to working towards an improvement in WFD status.

Enforcement:

We remain gravely concerned about the speed and effectiveness of the Environment Agency's response to environmental incidents. The Colne Valley Fisheries Consultative has recorded plentiful examples of responses that are slow and indicate an apparent lack of motivation to take enforcement action.

Resourcing:

The Colne Catchment Action Network and Colne Valley Regional Park (covering the south of the catchment) are well structured 'bottom up' organisations that deliver a wide range of one-off projects working to tackle the above, but there is much more that can be done.

Local Environmental organisations suffer from a lack of long term funding to enable them to address more strategic ongoing issues. Often much of the day-to-day monitoring falls to local volunteer-led initiatives from groups such as the Colne Valley Fisheries Consultative and the River Chess Association, supplemented by activity funded through short term projects – such as the Colne Valley Landscape Partnership that has enabled the recruitment and training of more than

70 'river rangers'. This is a cost effective solution, but it is not cost neutral – it also relies heavily on the goodwill and incredible time commitment of a handful of volunteers leaving the work vulnerable and unsustainable in the long term.

The cumulative impact of the above is causing many local environmentalists and community organisations to cry 'enough is enough' and to seek to lobby at the highest level for urgent change.

The Colne catchment covers over 1000km² on the edge of London, Herts, Bucks, Berks and Surrey. Given its proximity to London and large towns including Watford, Hemel Hempstead, Slough and Staines, it has tremendous potential to 'rise again' and serve as an attractive resource for millions of people.


We call for better national policy on regulation and enforcement, with national resourcing for the environmental watchdogs to take more timely and effective action against polluters.

We call for realistic local resourcing to enable environmental improvement, monitoring and community engagement in the Colne Catchment for the benefit of millions of people.

Led by Lord Randall of Uxbridge, President of the Colne Valley Regional Park, we request a meeting with you to discuss the issues outlined above, and to seek ways we can support the Environment Agency in addressing this on a national level, and working with you to improve the situation locally.

We look forward to hearing from you.

Yours sincerely



John Whitby
Chairman
Colne Valley Park



Tony Booker
Chairman
Colne Valley Fisheries
Consultative



Dr. Elaine King
Chief Executive Officer
Chilterns Conservation
Board



Tom Beeston
Chief Officer
Chiltern Society



John Pritchard
Chairman
Ver Valley Society



Gordon Freeman
Chairman
Spelthorne Natural History Society

Paul Jennings
Chairman
River Chess Association

