

Response ID ANON-NEE3-3467-Y

Submitted to **Challenges and Choices**

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The water story

1 The way we treat water today will shape all our futures. What changes can you make to improve the water we rely on?

Please input your response in the box below :

The Colne Catchment is a water stressed area, with average water consumption per house hold exceeding the national average. Each year we see the effects that over abstraction, climate change and point source pollution has on our rivers and wetlands. Where we acknowledge that water is a resource with many purposes, we do not think it should be supplied at the expense of the natural environment and at the expense of compromising important directives such as WFD. This highlights the need to identify new methods of water supply that do not compromise our rivers and waterways, in addition to the requirement for better environmental protections for our rivers and wetlands.

Given their global rarity and our responsibility as stewards of the environment, chalk rivers must be given the protection they deserve through statutory designation (such as Sites of Special Scientific Interest), with more stringent standards set to ensure that improvements are made across these assets, rather than deterioration/threats/risks simply mitigated.

We believe that more proactive and bold use of current regulatory powers, as well as more ambitious and bespoke regulatory protection across water stressed regions, is necessary to support catchment partner delivery and achieving "Good" status as defined in the Water Framework Directive.

Climate and biodiversity crisis

2 What more can we do to tackle the impacts of climate change on the water environment and what additional resources (including evidence, targets, tools and additional mechanisms/measures) do we need to do this?

Please enter your response into the box below:

The current climate, biodiversity and the water crises are all interlinked. Solutions to tackle the water crisis should also aim to embed climate and biodiversity benefits. This would help to offset climate issues and meet Government targets for carbon capture and reversing biodiversity loss.

3 What can we do to address this biodiversity crisis and meet the 25 Year Environment Plan targets for wetlands, freshwater and coastal habitats and wildlife?

Please input your response in the box below :

We believe that better decision making can only happen where we have robust data which in turn shapes our intelligence. Whilst citizen scientists can be supported by catchment delivery partners and others, it is essential that the relevant agencies do more work to monitor species and habitats, evaluate trends and opportunities, and guide catchment delivery using this information. Identifying ecological target flows (ETF) for chalk rivers is a critical piece of work which should be tackled as a priority by the relevant national authority.

It is not acceptable that recent reviews have actually reduced the monitoring taking place at a time when climate change is going to demand smart and timely land-use change and adaptation, if our species and habitats and the ecosystem service benefits they provide are going to be the best they can be.

4 Environmental targets can generate action and provide a strong signal of intent. Could additional statutory targets contribute to improving the water environment? If so, what types of targets should be considered?

Input your response to the question in the box below:

There is still much confusion regarding the carbon and water sequestration value of wetland and soils and how to quantify the benefit of different habitat restoration outcomes. In a water stressed catchment where wetlands and rivers are drying out, tree planting would not be the most appropriate activity to carryout in the floodplain, despite the benefits to carbon sequestration. There is a shortage of information in regard to other forms of habitat creation and their value for carbon sequestration.

Additional data is needed to ensure that the carbon and water sequestration value of wetlands and soils are fully assessed, recognised and promoted alongside other initiatives such as tree planting. This would enable prioritisation of habitat creation schemes tailored to combat local climate-related issues, especially in areas of water stress.

Where appropriate, new relevant KPIs should be developed and actively promoted to deliver these habitats.

Challenge 1: Changes to water levels and flows

5 What can be done to address the challenge of changing water levels and flows?

Please input your response in the box below :

It is essential that the impacts of abstraction and climate change are no longer conflated and viewed as part of the same problem.

Over abstraction should and can be stopped now, whereas we need to adapt to the impacts of climate change by enabling greater headroom for chalk rivers to

respond to changes in weather patterns.

6 The abstraction plan, referenced in the changes to water levels and flows narrative, explains our current and future approach for managing water abstraction. What else do we need to do to meet the challenges of climate change and growth while balancing the needs of abstractors and the environment?

Please input your response in the box below :

We would welcome abstraction reform to be more ambitious, delivered quicker and better supported by environmentally-conscious, interdependent Government policy that makes the link between growth, land-use and impacts to the water environment.

Regional and local development must start to be determined strategically, based on the context of water availability and meeting additional needs of the environment in the face of the climate crisis.

It is essential that less conservative and regulatory approaches are taken to reduce public water consumption, in order to support abstraction reform and reduce our collective human impact on the water environment.

We feel one vital challenge has been missed from the consultation, which has major impacts on the water environment, especially in groundwater reliant chalk river systems. This challenge is "land use and growth" – and how we can better ensure a resilient and healthy functioning freshwater environment in the face of land-use change, inappropriate land management, development and infrastructure growth.

The next iteration of River Basin Management Plans must be SMART outlining; specific measurable actions that will be taken to achieve "Good Status", appropriate and ambitious timescales to implement those actions, a cost breakdown, and how the RBMP will be resourced to fulfil these actions.

7 What kind of a water flow environment do we want? Should we maintain statutory minimum water flow and level standards universally across England as we do now, or go further in some places based on environmental risk?

Please input your response in the box below :

Ecological target flows (ETF), which maintain the characteristic biodiversity of chalk rivers, should be agreed and set and used to limit abstraction/extraction licenses, particularly across chalk rivers and areas of water stress. The ETF limits must be set to support natural flow regimes and good ecological status 100% of the time. These must be set at multiple locations across a river system, including the headwaters, to provide flow protection across the water course and reverse the trend of "new norms" developing out of low flow data.

Challenge 2: Chemicals in the water environment

8 What can be done to address the challenge of chemicals in the water environment?

Please input your response in the box below :

It is essential that the government takes a stronger approach in the regulation of production and use of chemicals that may impact on the water environment and therefore human health.

The long-term aim must be to design harmful chemicals out of production, with interim mitigation focused on end-of-pipe solutions and consumer behaviour changes.

End-of-pipe solutions should aim to integrate more holistic technologies that can also support UK biodiversity and carbon targets e.g. integrated wetland solutions for waste water treatment.

9 Do you support the Environment Agency's proposed strategic approach to managing chemicals as referenced in the Chemicals in the Water Environment challenge document? If not, what changes would you make?

Please input your response in the box below :

Where we support the EA's approach to: 1. protect aquatic life from exposure to chemicals; 2. reduce humans and wildlife exposure to chemicals in the food chain; 3. protect surface and groundwaters where chemical contamination may compromise their use for drinking water, we also believe that an essential long-term aim must be to design harmful chemicals out of production and to encourage consumer behaviour changes.

10 What balance do you think is needed between current chemical use, investing in end-of-pipe wastewater treatment options and modifying consumer use and behaviour?

Please input your response in the box below :

All are important elements that achieve better water quality on a long or short term basis. The long-term aim must be to design harmful chemicals out of production, with interim mitigation focused on end-of-pipe solutions and consumer behaviour changes.

End-of-pipe solutions should aim to integrate more holistic technologies that can also support UK biodiversity and carbon targets e.g. integrated wetland solutions for waste water treatment.

Better guidance could be provided to catchment partnerships regarding the construction specifications and effectiveness of end of pipe solutions so stakeholders can consider implementing such schemes. This would encourage the catchment partnerships to be more proactive regarding the implementation of such

schemes.

Challenge 3: Invasive non-native species

11 What can be done to address invasive non-native species?

Please input your response in the box below :

Tackling invasive species must focus on eradication, rather than just control. To support full eradication, it must be carried out as part of an integrated approach where local management initiatives are developed and supported through catchment delivery, and complemented by relevant legislation enforced where landowners do not engage or do not implement management programmes. Where possible, DEFRA-licensed biological control of INNS should be promoted as part of the Water Industry Natural Environment Programme.

At the Colne Valley Regional Park we have a number of strategic projects to monitor and control INNS in the Colne Catchment. Where we do our best to engage with landowners to promote best practice and to offer support where good will exists to resolve the problem, we struggle to work in areas where landowners do not want to engage with us. This makes a coordinated approach to invasive species control difficult to achieve, as there is no enforcement of the current legislation to ensure landowners prevent the spread of invasive species from their land.

Inaction by landowners is often understandable as they are often not sufficiently resourced to deal with the problem or aware of it in the first place. Targeted funding streams to enable catchment partnerships to support landowners are essential to providing a coordinated approach to the control of INNS. Currently there are few suitable funding streams for these projects as the control of INNS is regarded as essential maintenance work as opposed to a specific habitat improvement activity. Such projects can also have high capital costs due to the necessity to work with contractors to deliver work on the ground. We currently manage a Floating Pennywort control project for the lower Colne Catchment, the capital costs for this project are around £90K per annum. It is a difficult task securing this funding on an annual basis and targeted funding streams are required for the project to operate over the required amount of time to achieve the objective of reducing the range and severity of the species in the catchment.

12 How would you promote Check, Clean, Dry to all recreational users of water, including those who are not in clubs or attend events?

Please input your response in the box below :

Check, clean and Dry is an initiative that can be supported by catchment partnerships. It is essential to raise the profile of the campaign in order to ensure that it reaches enough people. Communications need to be targeted to key stakeholders in the areas they operate in a catchment e.g. angling clubs, sailing clubs, water sports centres, popular green spaces. Currently there is little signage or engagement to make site users aware of the issue.

13 Are there any barriers stopping you adopting good biosecurity when you are in or near water?

Please input your response in the box below :

No

Challenge 4: Physical modifications

14 What can be done to address the physical modification of our rivers and coasts?

Please input your response in the box below :

The consultation states that "At the current rate of progress it will take over 200 years to reach the government's 25 Year Environment Plan target of at least 75% of waters to be close to their natural state". There must be a positive step change in the action we take as a society to re-naturalise our rivers and in the level of investment, from government and the business sector, made available to enable us to do so.

A more robust regulatory framework is required to underpin increased efforts to re-naturalise rivers, lakes and estuaries. New measures such as; introducing a mandatory minimum 8m riparian zone with a bespoke declaration of the protected function of that zone, and placing a requirement on local planning authorities to comply with standards and EA planning advice, would help greatly.

The Environment Agency should make more courageous use of the tools and regulatory powers it already possesses to increase the rate of improvement. For example, the EA should be more prepared to use its power 161zb to secure 'morphological betterment' where persuasion to drive delivery cannot be made, which would help with achieving the level of improvement required.

It is important that a more robust and principle-led approach is taken by the Environment Agency, in the use of its enforcement powers relating to unconsented works that cause damage the water environment. Too often a cost/benefit approach to enforcement is taken; where the cost of prosecution is weighed against likely environmental benefit that may be achieved. The lack of enforcement on such works can often lead to additional unconsented works being carried out on adjacent land, leading to long sections of river becoming degraded. It is subsequently often very difficult and costly to undo the environmental damage this brings about.

Action to improve the physical state of rivers and wetlands could be better incentivised through introduction of more varied, flexible and ambitious payment options within new or revised land management schemes. For example, payments to revert land to functioning floodplain as part of a wildling approach.

Key indicator species should be determined as a driver for proposed enhancement works. For example, threatened or protected species such as European eel and water vole, could be a focus for determining restoration priorities and bringing delivery partners on board. This would help meet wider biodiversity targets, as well as working towards "good ecological status" under the Water Framework Directive.

There is a need for an established evidence base and flexible tool kit for defining and calculating the ecological, social and economic benefits of physical restoration projects, including de-culverting. This would help enable landowners and Local Authorities to make positive, more informed decisions regarding

delivery and resourcing of such projects.

15 Giving more space for rivers and coasts to move and adjust naturally will regenerate habitat, improve wildlife and help us adapt to climate change. What can you and others do to support these changes?

Please input your response in the box below :

Improving Wildlife Corridors is one of the Colne Catchment Action Network's Six Aims. Reversing the effects of physical modification is a key element of realising this aim and for achieving an improvement in WFD status for the majority of our waterbodies. We work with partners across the catchment to identify and deliver projects to reverse physical modification and to instigate collaborative working wherever possible.

Challenge 5: Plastics pollution

16 What can be done to address plastics pollution in the water environment?

Please input your response in the box below :

It is essential that the government takes a stronger approach in the regulation of production and use of plastics. The long-term aim must be to design all single-use and non-essential plastics out of production, with interim mitigation focused on clean up solutions and consumer behaviour changes. Sustainable alternatives must be incentivised and invested in.

17 What actions should the Environment Agency take to reduce plastic pollution?

Please input your response in the box below :

A "Plastics Free Angling Scheme" to phase out disposable plastic use in the sector (e.g. fishing lines, floats, boilie stops etc.) and highlight best practice among other water users, should established utilising Rod Licence income and match funding.

Challenge 6: Pollution from abandoned mines

18 What can be done to address pollution from abandoned mines?

Please input your response in the box below :

Not relevant to Colne Catchment

Challenge 7: Pollution from agriculture and rural areas

19 What can be done to address pollution from agriculture and rural areas?

Please input your response in the box below :

Bespoke land management schemes to protect water quantity and quality in water stressed areas, should be devised as part of the new land management support programmes.

These should be proactively promoted via an enhanced, fully resourced and extensive Catchment Sensitive Farming initiative, delivered in collaboration with appropriate catchment partners.

Catchment Sensitive Farming options should be extended to all farms in water stressed regions, as opposed to only those in current High Priority catchment areas, to derive additional benefits where opportunity allows.

Water Resources South East should work with their member water companies to ensure alignment of farming support schemes, addressing any inconsistencies and roll out working programmes to other catchments.

There are many excellent examples across the Lea and Colne catchments of farming interventions e.g. no till and cover cropping, offering multiple benefits including water storage and retention, pollution reduction , carbon capture and biodiversity support.

20 How can we support the farming sector to excel at innovative solutions which benefit both productivity and the environment? What should these solutions look like?

Please input your response in the box below :

As above

Challenge 8: Pollution from towns, cities and transport

21 What can be done to address pollution from towns, cities and transport?

Please input your response in the box below :

It is imperative that the Highways Authorities and Local Planning Authorities pay more regard to the water quality impacts of their decisions, whether these relate to roads, drainage, maintenance or new development infrastructure.

More proactive action is needed on a local, regional and national level to protect our rivers from urban and transport-related pollution. This should include

incentives, as well as enhanced regulations and enforcement operations, plus appropriately weighted penalties for non-compliance.

Businesses and industry are a missing link in River Basin Management Plan (RBMP) delivery and their contributions towards water efficiency and pollution reduction should be strengthened, for example through introduction of legally binding “water targets” and cross-compliance incentive schemes.

A functional riparian zone, of minimum 8m, must be protected and secured through the relevant planning authorities and automatic protective covenants should apply where land is sold on.

With regard to transport, we should not lose sight of the impacts from boat traffic, including pollution, invasive species translocation and impacts to flow through lock use. Working with the boating community and its regulators, the EA should seek to support and enforce measures that reduce these impacts.

22 How can sustainable drainage systems and green infrastructure be most effectively used to tackle pollution from urban areas? What challenges are there to using them?

Please input your response in the box below :

SuDS and green infrastructure needs to be central to the local planning process. We believe these activities are most effective and affordable when implemented when an urban area is created. Currently the degree at which such schemes are implemented is dependent on the specifications of the local plan for the relevant area. There should be stringent national standards that all councils and local authorities have to adhere to and an emphasis on developers paying for such infrastructure to ensure that our towns and cities become sustainable places to live in future.

Challenge 9: Pollution from water industry wastewater

23 What can be done to address pollution from water industry wastewater?

Please input your response in the box below :

Wastewater from water industry Sewage Treatment Works (STWs) is one of the main reasons that rivers in the Colne catchment are not achieving Good Ecological Status under the Water Framework Directive. There is an urgent need for more stringent effluent quality standards for STW's discharging into chalk river systems.

It is imperative that the Environment Agency monitor STW discharges more regularly and independently and cease reliance on self-reporting by the water industry. It is concerning that the practice of self-reporting continues to be accepted, at a time when real evidence highlights that some water companies have failed to accurately and reliably report on their discharges, resulting in major and ongoing pollution incidents.

Where it is found that a water company is breaching their discharge consents, we advocate that they should be put under 'special measures' to rectify damage caused to the environment, with the cost of this recharged to them. A tighter regulatory approach with an appropriate 'environmental levy' being placed on water company fines, would help ensure that the environment is properly restored rather punishment simply in the form of discounts on customer bills. There must be a step change in enforcements otherwise this will compromise delivery of the 25-year plan.

There are more than 20,000 Combined Sewage Overflows in the UK which are routinely polluting rivers, lakes, estuaries and the sea. This practice must be brought to an end and the 'temporary' licenses given to water companies by government, originally on privatisation of the water industry, should be revoked and a better solution found.

Due to groundwater infiltration into the sewer networks in chalk catchments, Combined Sewage Overflows (CSO) are seriously impacting the health of fragile chalk rivers in the Colne catchment. Stronger regulation is required to ensure water companies urgently address this issue to reduce the number and duration of CSO events.

24 What opportunities exist for water companies to collaborate with other sectors and organisations on measures to improve the water environment?

Please input your response in the box below :

There are many and varied ways for water companies to collaborate. In particular there should be joint work with Lead Local Flood Authorities to address drainage and infrastructure, public realm attenuation, and household level action.

Catchment partnership working

25 How can local partnerships become more inclusive and representative of all of the stakeholders within their catchments?

Please input your response in the box below :

It is important that the EA, Defra and relevant other authorities, demonstrate they have heard what consultees have said and respond by outlining how they (EA and Defra) are going to change in order to give practical expression to the consultation, and begin to work in a proactive way to secure the changes that are necessary if we are going to meet these challenges together. The river catchment community is becoming increasingly frustrated at the lack of feedback on, and action to act on, the practical and informed suggestions made through consultations.

The neighbouring Lea and Colne Catchment Partnerships are ready, willing and able to participate in trials and pilots aimed at developing best practice and new innovative approaches.

We feel that businesses and local authorities have a major role to play in catchment delivery, but at present engagement is patchy and determined mainly by voluntary initiative and goodwill. More active and consistent engagement can and should be encouraged, including through requirements set out by Government,

enforced / incentivised by Defra or the EA, and supported by catchment partnership delivery where appropriate.

26 How can local partnerships achieve a better balance of public and private funding to support and sustain their environmental work?

Please input your response in the box below :

We feel that businesses and local authorities have a major role to play in catchment delivery, but at present engagement is patchy and determined mainly by voluntary initiative and goodwill. More active and consistent engagement can and should be encouraged, including through requirements set out by Government, enforced / incentivised by Defra or the EA, and supported by catchment partnership delivery where appropriate.

Who pays?

27 How should the step change in protecting and improving the water environment be funded and who should pay? Are there any barriers to doing this?

Enter the response in the box below:

Timely and more reliable financial support to voluntary sector catchment hosts and some delivery partners should be made available, to ensure they are better resourced to upscale their roles and create more delivery capacity. This is especially important to help recover from COVID19 associated financial pressures quickly and adequately when the time comes.

Canal and River Trust should engage with and be supported through catchment partnership working locally, to do more to deliver their WFD obligations, and this proactive expectation should be reflected in any future funding agreements with Defra.

Supporting information

Complete and submit consultation

28 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. Please select from the following options:

Responding on behalf of an organisation (Please specify which organisation or group and include what type it is, e.g. business, environmental group, etc)

Name of organisation or group, if you don't want to leave the organisation name, please tell us what type it is.:

Colne Valley Regional Park: Host of the Colne Catchment Action Network (ColneCAN)

If other, please specify:

29 What is your email address?

Email:

tom.white@groundwork.org.uk

30 What is your name?

If you are happy for us to contact you about your response please leave your name below. We will not publish your name and will only contact you for clarifications about your response or to follow up on any suggestions you have made. :

Tom White

31 Please select which river basin district your response to this consultation applies to (you can select more than one or submit a national response by selecting 'England').

Thames

32 Are you happy for us to publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

Yes

If not, please let us know why.:

33 Finally, it would really help us if you let us know where you found out about this consultation.

Through engagement with Environment Agency, Other (please specify below)

Where did you hear about the consultation - other:

Essential roll out for catchment partnership hosts