

River Basin Management Plan 3  
Challenges and Choices Consultation  
Response from the Wild Trout Trust, September 2020

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

The Wild Trout Trust (WTT) is a conservation charity working across the UK and Ireland to help anyone interested in making a better world for rivers, lakes and their wildlife, including our native brown trout. Flourishing wild trout populations are a sign of the health of our waterways and the land around them. WTT has a team of expert Conservation Officers that work in partnership with landowners, local communities, fishing clubs, rivers trusts and government agencies to offer practical advice and deliver hands-on habitat improvement projects.

From what we see on the riverbank, our natural water resources are in jeopardy from the way our catchments are managed and a failure to protect sensitive watercourses from damaging practices like over-abstraction, physical modification, land drainage and pollution. This has severe implications for drought and flooding, as well as seriously degrading vital areas of our aquatic ecosystems, particularly so for the many, oft-neglected first and second order streams. As *Challenges & Choices* notes, most watercourses are no longer capable of supporting the range and numbers of wildlife that they should, and the surrounding land no longer providing the natural ecosystems services of water supply and storage that it should.

WTT's aim, working with many partners including, very successfully, with the Environment Agency, is to inspire others and give them the advice and practical skills to improve and maintain waterbodies for all wildlife. Through river restoration projects, practical demonstrations of habitat improvement techniques with volunteers, advisory visits and presentations at meetings (from local community groups to international conferences), a dynamic website and strong social media presence, we are spreading messages on the impacts affecting our waters and what everyone can do to make things better. Annually, we work on hundreds of kilometres of river and involve thousands of volunteers in tens of thousands of hours of work for our rivers; we believe that there is strong evidence of behavioural and attitudinal change in how people think about our rivers and lakes, though greater regulation is needed of those who would undo any gains from that change.

**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?**

It is vital to ensure that wildlife populations and the habitat upon which they rely are resilient enough at least to have a chance of adapting to the changing climate. This means addressing many existing anthropogenic impacts, many of which are acknowledged in *Challenges & Choices*, in particular:

- Removing all unnecessary in-river barriers
- Restoring the natural form and function of river channels, through active river restoration projects but also more sensitive and sustainable management of watercourses, by landowners and responsible authorities

- Addressing the widespread, poor land management that continues to occur, including agricultural diffuse pollution and degraded riparian habitat, through provision of advice and the effective implementation of regulation where and when appropriate
- Restoring upper catchment habitats to function better, hydrologically and ecologically, through renaturalisation
- Reducing the commonplace mis-sited over-abstraction of groundwaters, to allow our rivers to flow (particularly in southern & eastern England), through active engagement of regulatory agencies in planning processes and obligations on water companies to access sustainable (not simply the cheapest) water resources
- Preventing the widespread pollution of our watercourses from point sources like wastewater treatment works, through water company infrastructure investment and effective state agency regulation.

We believe that one of the greatest threats is the current lack of regulation and the hands-off approach applied to enforcement of existing legislation, with minimal regard to inappropriate land use, agricultural diffuse pollution, illegal work within rivers (dredging and drainage that flaunts a range of environmental legislation and, often, designations) and waste water pollution. Our aquatic and adjacent terrestrial ecosystems require a far greater standard of protection than they are receiving if they are to be able to support the full complement of native flora and fauna that they should. The findings of most Wild Trout Trust watercourse assessments (walkovers, WFD investigations, advisory visits) do not only answer the question of why our watercourses are underperforming; they raise the question as to how they could possibly be in their current state.

Reducing the regulation of harmful practices like dredging and handing over the governance of ordinary watercourses to organisations who lack the expertise, resource and inclination to properly protect our watercourses we believe was an error (warned by many conservation organisations at the time) and the de-regulation of many main rivers to ordinary watercourses is just compounding that mistake.

### **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?**

Much of southern and eastern England suffers from water scarcity and increasing human population; thus, we have an existential water crisis. Initiatives are ongoing with water companies, government and the Third Sector to find alternative water sources, but progress is slow and timelines too long. We believe that there needs to be centralised cohesion of effort and an injection of urgency to address this crisis. Coupled with this is a need for an effective educational programme for the public, to drive down consumption. The published data for domestic water consumption demonstrate that the current initiatives are ineffective, with inconsequential or non-existent reductions for most supply areas. Above all, Government through Ofwat must value water – the current price setting devalues water in the eyes of the water industry and its customers.

Far greater investment and expediency is required in the delivery of major improvement to sewage treatment and regulation of discharges to watercourses; the progress being made in many areas is unacceptably slow. It appears to be down to the Third Sector to identify the true scale of sewage pollution in our fresh and coastal waters, with little enforcement by regulators. There is evidence that self-monitoring is open to abuse by some in the water industry.

As noted above, we see a need to reduce watercourse clearance, dredging and land drainage (including inappropriate use of herbicides in watercourses) and restrict their application to only the highest risk areas where there is no other option to protect existing infrastructure. The inappropriate dredging, maintenance and general mismanagement currently being inflicted upon many of our water courses on unsupported flood risk grounds must cease. Moreover, the undertaking of this work in many areas by the authorities (e.g. EA, IDBs) to appease public opinion on perceived flood risk is wholly inappropriate. A far stronger, more responsible and transparent stance needs to be taken by EA, showing the strength and leadership not only to resist pressure to undertake actions like inappropriate dredging and watercourse clearance (where there is no evidence for it reducing flood risk) but also restrict others from doing so.

A coherent, supported (regulatory and financially) approach for catchment management to significantly increase the protection of riparian zones and adjacent land, to increase the extent of upland tree planting and re-wetting of peat bogs is required and long overdue.

Greater enforcement action must be taken against land management offences: channel dredging, straightening, and general hydromorphological harm to watercourses (inappropriate revetment, bank works culverting), along with agricultural, industrial and domestic pollution. We perceive that tough regulation and enforcement action is rarely taken.

**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?**

Yes. Whilst targets for Water Framework Directive (WFD) improvements have been repeatedly missed, we believe that WFD has delivered improvements to freshwater ecosystems in recent years and proved pivotal in ensuring that vital funds were allocated to environmental improvement work. In addition to WFD being consolidated into UK legislation, more aspirational goals should also be set to accelerate the processes of water quality and habitat improvement and ensure that the considerable amounts of funding required are prioritised for this work and obtainable into the future. This is especially true with the financial uncertainty surrounding a post-Brexit and post-Covid UK.

Additional statutory targets (and likely legislation) are already required to protect and improve the overlooked smaller first and second order watercourses that have been largely abandoned by de-regulation, rarely factor in WFD and other assessments and are being increasingly degraded. These overlooked watercourses provide vital habitat that underpins many of our fish and invertebrate populations further down the system. The mismanagement of those watercourses is also contributing to our increasing water resource issues, through reduced supply/storage and increased flooding.

However, it is noteworthy that we have an existing and extensive suite of environmental legislation; as repeatedly noted above, what we lack is effective enforcement of that legislation.

### **Challenge 1: Changes to water levels and flows**

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

At the top of many catchments, we see a disparity between attempts to slow the flow and increased dredging and land drainage, inhibiting water storage in natural floodplains and low risk areas, increasing run off and water conveyance. Greater restriction of inappropriate gripping, dredging and land drainage must be initiated, along with increased upland planting, re-wetting of peat bogs and appropriate buffering of all watercourses. With the level of degradation that has already occurred to our catchments, wholesale land management changes are required. This will require environmental stewardship schemes that are fit for purpose, implemented, monitored and regulated. We look forward to ELMS addressing this challenge.

Far greater protection of our water resources is required from the impact of surface and groundwater abstraction, particularly in southern and eastern England. The fact that designated sites usually require a higher standard of protection than EFI compliance highlights the burden that is already placed upon most other waterbodies, which in itself represents a major barrier in improving them towards the higher ecological standards of protected sites. This is even before the recent failures to even meet EFI compliance and the 'get-out' of heavily modified watercourse designations.

Greater restrictions must be placed on future housing and business development in already over-abstracted and at-risk areas, diverting such development/urbanisation and industry towards areas with greater water resource capacity. This is far from a simple task but should be at the heart of any future planning. Certain areas

of the country are simply not capable of supporting additional development until the water resources issues are adequately addressed and this must be better recognised within the planning and development process.

Habitat improvement has a place in the restoration and maintenance of our flow-impacted rivers, but it can only be an interim measure until the fundamental issues are addressed and should certainly not be seen as a get-out to allow continued and/or further inappropriate land use, watercourse mis-management and over-abstraction.

**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?**

As noted above, there are key needs to manage abstraction:

- True valuing of water – driven by Govt and Ofwat, water is simply too cheap and thus not valued.
- Water consumption must be brought down significantly. Current rates are unsustainable and targets for reduction inadequately ambitious.
- Some of the major water companies of southern England have no or inadequate water storage capacity, taking their supply directly from river or groundwater. This is not sustainable. It is vital that initiatives to increase water storage are progressed at the very highest level and with urgency. All too often, targets are set on multi-decadal scales when our crisis is now.

**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?**

We should be going further still, not only to increase the protection based on currently perceived environmental risk, but also to afford a greater standard of protection to all waterbodies to create a scenario where actual improvements are possible, rather than maintaining the currently depleted state (hydrologically and ecologically) of many watercourses. Initiating more natural flow regimes in regulated systems could be a very small but important part of this; some such work already being undertaken. We cannot manage flow and level universally across England, because rainfall, river flow and abstraction demand are so regionally variable – we must aim for local solutions to local problems but with an over-arching, national strategy.

## **Challenge 2: Chemicals in the water environment**

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

Increase regulation and compliance checking upon the use of harmful chemicals in the natural environment. The excessive use of fertilisers and inappropriate disposal of slurry is widespread, and the inappropriate use and/dosing of pesticides is certainly also occurring (as confirmed by water quality testing, and often highlighted by testing of water abstracted for potable supply).

Adequately sized buffers should be made mandatory along all watercourses, thereby creating a physical stand-off and interceptor for runoff, sediment and chemicals while also increasing soil and bank stability and improving riparian habitat quality. This course of action would be greatly assisted by increased screening and more rapid phasing-out of chemicals with long persistence rates within the natural environment. Research has also identified potential solutions to at least reduce the burdens upon our watercourses from chemical and fine sediment through better land management and inventive ways of farming like zero-tillage and improved crop rotation regimes. More forethought, guidance and, where required, restriction on the ways in which land is used and managed is needed, ensuring that sites are appropriate for the purpose in which they are used. ELMS can have a major role to play here.

We must continue to adhere to the guidelines developed collectively by the other EU countries to ensure that even though we are leaving, the standards of environmental protection enacted in the UK should actually increase.

**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?**

The strategic approach to chemicals for river basin planning is good, but as with any such initiative, voluntary and informal measures must be supported by enforcement action for non-compliance. It has been proven time and again that the voluntary/advisory approach is not working and is unlikely to ever work without the real threat of enforcement.

**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?**

All clearly play a part and reducing the usage of harmful chemicals must be the primary goal, as removing the worst chemicals from the system is the only way to completely prevent their impact. Modifying consumer use and behaviour has a part to play and can be achieved through greater education of risks and issues but restricting the supply and distribution of harmful chemicals has to be the primary course of action. Improved guidelines and, most importantly, enforcement of those guidelines is required to limit the inappropriate use of chemicals, particularly herbicides and pesticides (also fertilisers) in the natural environment. Many land users are still unaware of (or are ignorant to) the required standoff from watercourses for the legal use of chemicals (including fertiliser/slurry) and the regulators have historically been reluctant to enforce them. We believe that EA's hands-off approach to regulation cannot continue and this is true across the board, from agricultural use through to industry.

Greater investment in wastewater treatment is clearly required, with many water treatment plants around England still failing to return water at a standard capable of even supporting aquatic life and degrading the recipient watercourses to that state. EA water quality data published in September indicate that we are losing the battle with chemical pollution.

### **Challenge 3: Invasive non-native species**

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

Preventing the introduction of new INNS (and disease) must be achieved by tighter restrictions on imports from other countries. It is not acceptable merely to highlight that the greatest threat is from the ornamental species trade. Greater restrictions are required on import licensing and ownership of non-native species, along with high penalties for illegally possessing those species, and greater investigation and monitoring of their escape into the wild, with meaningful penalties if that should occur. Greater onus must be placed on the owners of property containing non-native species. How many such landowners have ever been prosecuted for illegally allowing the spread of non-native species into the wild?

Larger budgets are required for tackling non-native species, along with far better coordination of any efforts and direction of how those funds can be effectively applied. Too much money allocated for non-native species eradication has already been squandered in uncoordinated efforts that fail to first identify the source of the problem, wasting time and resource in areas that have no hope of eradicating the issue until other areas are first addressed.

There is obviously too a need for further education on the impact from INNS to our environment, using mainstream and social media. Govt agencies and NGOs can both play a role here.

**12. Within the Catchment, how would you promote Check, Clean, Dry to all recreational users of water, including those who are not in clubs or attend events?**

Check, Clean, Dry should be promoted with broader campaigns to all sectors, highlighting the potential risks through advertising/mailshots, signage and engagement events (as already occurs but continued and expanding). However, it is primarily a means of controlling further spread and can only ever be a delay tactic which will ultimately be of limited value unless real action is taken to prevent the import of INNS and identify the exact extent of INNS already here so that they can be controlled at source.

Check, Clean, Dry will never be successful as a long-term strategy when one individual's failure to comply (or a malicious act) on even one occasion can undermine the conscientious work of millions. At best, it can only play a small part alongside decisive action to prevent introductions and eradicate existing infestations.

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

No. Organisationally, we follow thorough biosecurity protocols; however, apathy is apparent in the general public, inevitable in the absence of a more strategic approach and meaningful action being taken to eradicate many existing INNS. The perfect examples being Himalayan balsam, skunk cabbage and giant hogweed, which could have been far more effectively controlled (possibly eradicated from many catchments) with the funding and resource already spent, simply through a better-coordinated approach.

**Challenge 4: Physical modifications**

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

Much greater consideration must be given to the long-term ecological impacts of existing structures and channel modifications before they are afforded protection, permitted to be repaired or re-purposed. New uses of in-channel structures, particularly for hydropower, should not be used as an excuse to retain otherwise redundant structures under the guise of green energy, when structures in our rivers create such environmental harm and, by extending the requirement of those structures, will then continue to do so for many years to come.

There must be a real presumption to remove and, most importantly, work exhaustively to facilitate the removal of all existing man-made structures. Many structures that should be removed are being eased or having fish passes installed, through a lack of regard to the impacts that weirs create. We look to EA, as the lead authority, to be strong here, driving full removal of redundant man-made, in-channel structures. The plight of many now 'at risk' migratory fish species underlines the importance of such a stance, highlighted as a priority action in all relevant EA plans.

Moreover, the investment of fish passage and water resources funds must also be utilised to investigate sustainable, fit for purpose solutions to the major issue of gauging weirs. Alternative technologies exist to weirs for flow gauging already and further R&D is required to ascertain whether that technology can be adopted more widely and/or whether other inventive methods are required to obtain the flow data we require, without the irresponsible impact of gauging weirs upon watercourses.

The standard of regulation through planning and permitting must improve, along with appropriate enforcement and remediation where inappropriate or unconsented work is undertaken – we see this as an issue across England.

Rather than relaxing the regulation of dredging, far higher standards of protection must be given to our watercourses (both Ordinary and Main River). The extent of unnecessary dredging and continued channel maintenance in low flood risk areas that were or would otherwise be recovering is unacceptable and completely at odds with the aims and obligations of WFD and the 25 Year Plan. Furthermore, it is at odds with the principles of slowing the flow and reducing the flood risk to highly susceptible areas downstream.

Wherever habitats are naturally recovering, there must be a presumption against reinstating the previously impacted state and providing environmental permits to do so; instead, actively encouraging continued habitat recovery and helping to facilitate that action through land management schemes and advice. This is a general policy at present, but often fails without the appropriate funding, support and, where necessary, legislation. Progress in this area will not only deliver major habitat improvements but also greatly reduce the costs and even requirement to undertake such work in the future.

Ensuring that the Environmental Land Management System (ELMS) only provides funding to land management that benefits the environment and that beneficiaries are made to adhere to best practice (unlike previous schemes) will be pivotal in driving the much-needed improvements to land management, and reducing fine sediment input to watercourses (with associated benefits in reducing chemical inputs). If implemented correctly, such schemes should also have the potential to change the type of land use alongside watercourses, reducing surface runoff and sediment inputs and also create space for additional trees and wildlife refuge. All of this being achieved while actually assisting the land users, rather than previous schemes that have in many ways penalised responsible land users who incur additional cost and/or inconvenience, while other users flaunt the rules (with negligible, if any, risk of enforcement action). The new scheme must not simply subsidise the status-quo and support unprofitable/unsustainable businesses.

The 25 Year Plan commits Government to the reintroduction of extirpated species, such as Eurasian beavers. ELMS presents an amazing opportunity to make rivers fit for beavers *before* they are further released to the wild, offering this keystone species wide buffer strips and planted trees to realise the benefits it can bring. An alternative is *not* to seize this opportunity and release beavers into an ill-prepared landscape, creating great conflict with key catchment stakeholders and increasing the cost of management of beaver induced issues.

**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?**

The development of land adjacent to watercourses in areas that will prevent their re-naturalisation must be recognised and prevented. This will involve personnel within the planning and development process being aware of where these high value areas are and what is required to protect them, which is often not the case currently.

The past degradation of our watercourses must not be maintained and re-inflicted upon them. Where watercourses are beginning to naturally recover, there must be a presumption against re-dredging, straightening, revetting, repairing weirs (or rejuvenate them with hydropower schemes) or otherwise inhibiting that natural recovery. As with natural flood management, far greater, targeted funding has to be made available if this is to succeed. Landowners cannot be expected to shoulder the financial burden alone, and recent history shows they won't. However, if incentivised (and regulated) appropriately, habitat restoration, river restoration and improved land management schemes can be effective. Yet again, regulation of those who are not managing land responsibly or appropriately is pivotal, otherwise that lack of regulation is penalising those who are choosing to do the right thing and in doing so incurring greater costs or inconvenience over their non-compliant counterparts. Increased regulation need not be a burden on responsible management but it must be enforced and there should be a significant penalty for non-compliance. There has been a catastrophic failure on this in recent times.

The work that we do as a river conservation charity is all about renaturalisation of rivers, for all the benefits that can bring. We are also working very closely with many partners to drive an initiative to *make rivers fit for beavers* – if we do this, giving our rivers space, reintroduced beavers can be the mechanism that starts to restore natural processes to many of our rivers.

## Challenge 5: Plastics pollution

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

First and foremost, the use of avoidable, often excessive plastics, particularly in the food industry, must be addressed. Reducing the amount of plastic used on the many over-packaged items could greatly reduce the overall issue. This is in addition to reducing the general use of non-recyclable (or compostable) plastic. No other action can be as effective as tackling the issue at source.

Initiatives like PACT are a step in the right direction, with some short-term realistic goals, but far more aspirational long-term goals are required, backed by legislation (not just guidelines).

While further research into the distribution and impact of plastics is required, this should be secondary to measures to reduce and, where possible, remove plastics from the supply chain.

Tax for the use of less than 30% recycled materials in plastics might be a realistic interim measure, but it does not go far enough as a mid-term aspiration and the same is true of the goal to recycle only 70% of plastic packaging.

The polluter pays principle is clearly required in funding the range of research and management actions to begin addressing the issues; however, the recommended ban on the use of plastic products where alternatives exist must also be legislated expediently. This must be managed carefully to ensure that the manufacturers pay their share and it is not achieved at disproportionate expense the consumer.

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

Far better screening and screen maintenance, along with higher minimum standards for screening, settlement and disposal is required for any discharges to the aquatic environment; be they treated water outfalls, CSOs or storm water overflows, or simply surface water. Moreover, even the existing low standards are inadequately enforced and regularly breached with uncountable raw sewage, inadequately treated sewage and sewage litter discharges occurring daily through inadequately treated, screened and maintained outfalls.

Further investigation into the potential impacts of spreading sewage treatment by-products to land is required, along with greater oversight and potentially restriction on the process until it is better understood, applying the precautionary principle.

A joined-up approach of reducing plastics in common use, increasing the use of recycled, recyclable and most importantly, degradable plastics must be implemented. This should be coupled with initiatives to maximise the recycling of plastic products residual in the system and significant penalties for organisations sending recyclable plastic to landfill.

## Challenge 6: Pollution from abandoned mines

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

Projects should not simply look to address the pollution from abandoned mines. The physical damage to river form, function and riparian zones must also be tackled and can in many instances be done through the same measures of removing, redistributing or re-sculpting mine spoil from floodplains and undertaking complementary river restoration. Developing more natural, stable watercourses through and connected to disused mine areas can help to reduce the rates and extent of erosion and therefore the input of deleterious materials and chemicals.

Increasing the protection of upper catchments through grip blocking, revegetation and replanting of trees will not only help protect habitat and reduce flooding but also reduce the erosion through mine sites, reducing the rate at which mine spoil is reworked by watercourses and therefore the rate at which metals and other pollutants enter our river systems. Where mine spoils cannot be removed from the floodplain (or until that is possible) schemes to increase the consolidation of mine sites and spoil through revegetation and capping with suitable growing media so that it can become consolidated should be a primary goal and can be complemented by channel restoration.

## **Challenge 7: Pollution from agriculture and rural areas**

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

Farming Rules for Water potentially have a pivotal role to play in the reduction of agricultural pollution, providing they are applied and enforced appropriately; from our 1000 days on England's rivers each year, we see little evidence that this is happening. We believe that a lack of staff resource has meant that EA and RPA have failed to recognise, manage and act upon these issues. The number of Cat 1 and 2 pollution events recorded in England has remained the same for at least the last decade, even in the face of less monitoring; Cat 3 events are no longer recorded, so we know nothing of their chronic impact on our environment. As such, for real improvements to be made, it is likely that the public will have a large role to play in the reporting of issues around our catchments, so that the EA and Natural England can act upon that information.

A combination of identification (reporting), advice and, most importantly, the threat and delivery of actual enforcement action where required is imperative for this strategy to work.

### **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?**

The simplest solution is agri-environment schemes and rural payments that are fit for purpose: payments for real improved practices and ecologically sensitive farming, as opposed to subsidised farming and a financial encouragement to maintain the status-quo, with no improvement to practices or the environment. ELMS presents an amazing opportunity to get this right. As before, penalties for non-compliance and enforcement action for infringements of environmental legislation must play a large part. We are concerned at the references to self-assessment included in the ELMS discussion paper; in the absence of thorough and rigorous enforcement, self-assessment is a meaningless tool.

## **Challenge 8: Pollution from towns, cities and transport**

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

The interception and treatment of more surface water and urban runoff must be achieved, particularly from larger urban areas/ urban catchments. The actual impact upon water quality and input of plastic and other materials from surface water is poorly understood as these discharges are largely unmonitored, but increased interception and detention of surface water prior to discharge to watercourses would allow settlement of pollution and debris, while also reducing the rate and peak flows from runoff and potentially allowing for increased biological filtration (reedbeds). This is not just relevant to new developments per-se, but also in redressing the issues existing surface water systems and, potentially, combining them with new schemes.

### **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?**

Sustainable urban drainage can play a vital role in the regulation of flow and reduction of pollutants on many urban catchments and greater use of SUDS must be an increasing part of urban water resource management, not just for new developments but also through retrofitting schemes to existing infrastructure. The benefits of

this to the environment will be manifold and along with greater separation of surface and foul water can also potentially reduce the burden upon water treatment infrastructure (treatment works and the sewage network) and water companies.

Re-naturalising heavily urban areas through watercourse restoration/daylighting and breaking out areas of concrete, paved and other impermeable areas wherever possible to improve rain infiltration is also vital. Such actions can potentially deliver a wide range of other ecosystem services, increasing the availability of green spaces and areas where natural rain infiltration can occur, reducing urban runoff and the associated pollution issues.

## **Challenge 9: Pollution from water industry wastewater**

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

There is a growing body evidence in the Third Sector that regulation of water industry wastewater is ineffective: water quality across England is deteriorating, according to EA's own data. There has been no reduction in Cat 1 or 2 pollution events from the water industry for at least a decade (EA data, generated by a great deal less monitoring) and Cat 3 events are no longer recorded, so the impact of that chronic pollution is simply not known, except that we know that water quality across England is deteriorating.

Most water company waste water infrastructure is aged and the industry has failed to re-invest for many years, reaching a crisis point now as population growth overwhelms WWTWs. Huge fines imposed on a number of water companies in recent years point to this, in one case for serious manipulation of data and breaches of professional practice.

The water industry *must* accept its environmental responsibilities and operate its business in a genuinely regulated environment; the regulator must enforce that regulation.

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

Encourage the disposal of organic oils absorbed into biodegradable media like kitchen roll, which is easily achieved while it is still warm, not in sealed containers (as is suggested in the guidance to this consultation). The use of sealed containers unnecessarily precludes their subsequent re-use or recycling.

Clearly better education of what should be allowed to enter drains and domestic sewage is required, but water companies have the end responsibility of what they discharge to our watercourses, which is contributed to by the charges the end users incur and is part of the water industry business. Improved legislation on the manufacturing of products that regularly enter the sewer network is also required, to reduce the burden on water companies and limit the potential for chemicals and plastics ultimately entering our watercourses.

Currently, the water industry seeks to meet its obligations through WINEP and funding of local environmental initiatives. Undoubtedly, some of these projects, with which WTT has been involved, have been effective in engaging local communities in environmental improvement and future work of this nature should be encouraged, however, we also have concerns that WINEP projects fail to address really significant issues, such as failing WWTWs, with debatable value for money.

## **Challenge 10: Catchment partnership working**

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

The key to catchment partnership working has to be through improved invitation and greater engagement with local communities; they are still often unaware of what's going on. Working with partnership organisations to improve environmental education and training is a key aspect of developing interest, appreciation of our countryside and continued involvement. However, a large caveat is the need to manage

these processes as the views and options raised by the public through are only as valuable as they are well-researched. There is, however, a very genuine issue to be addressed as to how NGOs can fund their engagement with local catchment partnerships, with multiple meetings consuming staff resources.

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

Greater environmental education is likely to be an important factor in this, helping communities, landowners and users to realise the often-significant benefits to themselves in protecting and restoring and appropriately managing the environment, even if the proposed actions initially appear alien to them. Engendering a sense of inclusion in projects, often through training and education, will be key to their eventual success, even if the principals involved must be strongly encouraged at first. A weak, non-committal stance on environmental matters just leads to a lack of trust and reluctance to accept what is well supported fact and and/or professional guidance.

**Challenge 11: 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?**

As noted above, we must as a nation value potable water – it is simply too cheap at present. So, consumers must pay.

Water reuse must be at the very heart of housing development – we cannot afford any other route. Developers must pay.

The polluter pays principle is sound and, in particular, businesses that derive their profit from the environment (water companies) should pay. This should also potentially be extended to abstraction licences.

A significant amount of public money from national budgets must continue to be allocated as it is part of our collective responsibility and ultimately all of us that will benefit.

Effective environmental land management schemes (in various guises) will be key to the improvement of our environment, ensuring that the widespread degradation currently inflicted upon our countryside by agriculture is reduced.

**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: Wild Trout Trust, river conservation charity

**29. What is your email address?**

[director@wildtrout.org](mailto:director@wildtrout.org)

**30. What is your name?**

Shaun Leonard

**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').**

England (all river basin districts)