

Wildlife and Countryside Link Response to the Environment Agency consultation 'Water for life and livelihoods – a strategy for River Basin Planning'

Wildlife and Countryside Link brings together 35 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of almost 7 million people in the UK. This response is supported by the following organisations:

- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Friends of the Earth
- The Herpetological Conservation Trust
- Marine Conservation Society
- The Ponds Conservation Trust
- RSPB
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- Woodland Trust
- WWF-UK

Summary

River Basin Planning lies at the heart of the significant new approaches to water management in England and Wales that will be required if the objectives of the Water Framework Directive (WFD) are to be met. Wildlife and Countryside Link welcomes the opportunity to comment on the Environment Agency's proposals for the new planning structures. However, we must express our disappointment that the consultation document is inadequate and limited, and without further elaboration threatens to miss a unique opportunity for modernisation.

The lack of detail contained in the consultation suggests that the Agency is intent on doing little more than the minimum required to meet the legal requirements of the Directive. We believe that the proposals set out in the document do not compare well with proposed RBP practice in Scotland under the Scottish Environment Protection Agency.

Imaginative and detailed proposals are required before a final strategy for River Basin Planning is published. We hope to work closely with the Environment Agency in developing such alternatives, and strongly suggest that further open and frank discussions with stakeholders must take place.

Key Issues

1. The need for statutory and representative River Basin District Advisory Groups

The River Basin District is the level at which a statutory plan must be produced, and therefore stakeholder involvement is imperative. Many sectors will be co-deliverers in implementing programmes of measures to achieve good status, including water companies, the agricultural sector, Natural England, the Ports Authority, local authorities and environmental NGOs. These

groups must be involved in decisions over objective setting, the use of derogations, and the formation of programmes of measures. Statutory River Basin District Advisory Groups must be established with adequate representation from key players and interest groups. These bodies must be adequately resourced with an EA staff post to manage each one.

2. The need for catchment forums.

In addition to actions at the National and District level, there is a significant role for planning and implementation of the WFD at the sub-District level. In the long term, a more localised approach will aid participation, improve information provision, and the delivery of measures.

These principles are recognised in the *Framework for Stakeholder Engagement* published by the Agency, in conjunction with the primary consultation document. Based on the experiences in the Ribble, the *Framework* assessed that sub-District Catchment Frameworks would be able to tap into “rich local knowledge” and could be produced “in parallel” with the overall River Basin Management Plan.

We recognise that there are issues of cost-efficiency, which must be considered, as well as concerns over the technical capacity and participation of key decision-makers in such forums. However, we believe that the sub-District level has a vital role to play in delivering WFD objectives. We are keen to work with the EA to consider how the advantages of an integrated, catchment scale approach can be reconciled with concerns about the costs.

The WFD covers coastal and transitional waters out to one nautical mile in England and Wales (three in Scotland), and this will bring a much needed statutory approach to coastal management, which has been missing from ICZM. The supporting document - 'River Basin Planning and Integrated Coastal Zone Management' (ICZM) - makes much of the need for public participation and stakeholder involvement with regard to the development of ICZM policies and their implementation within the framework of the WFD. As with District and Catchment planning, it is important that this principle is observed.

3. The need for streamlined planning.

River Basin Planning must be integrated with other key water planning processes, such as abstraction, flood and drought management, and coastal management. While the consultation document recognises this, it does not provide any specific proposals, noting that the important relationship between sub-District sectoral plans and River Basin Planning remains to be determined. This is disappointing, and Wildlife and Countryside Link very much hopes that more detailed and specific commitments will be brought forward, with opportunity for discussion.

We welcome the recognition of the need for links to be forged between land-use planning and water planning. Given that RBMPs will be statutory, we believe that planning guidance will need to be relatively prescriptive, and be backed up with some direct technical guidance to both strategic and local planning authorities.

We hope the EA will promote the valuable ecosystem services of semi-natural habitats, and in line with its statutory duties to nature conservation, ensure their protection is promoted as much as possible in spatial planning.

While much is made of the principles of stakeholder involvement, there is little mention of cross-departmental Government involvement. This is clearly critical if water planning is to be tackled in a joined-up way. Key departments include ODPM with respect to planning and building on flood plains, and water efficiency of new developments, and Defra with regard to rural land use.

There is a need for a clearer indication as to how the EA intends to integrate the RBMP with the needs of Integrated Coastal Zone Management. It is important that adequate coordination and links are formed with the proposed Marine Bill, which will have significant implications in terms of spatial planning for estuarine and coastal waters.

The Way Forward

It is clear that key and challenging issues remain to be thought through before an effective River Basin Planning strategy can be finalised. The current consultation document is inadequate for this purpose, and there must be further discussion. A number of key WFD stakeholders will be working together to consider these issues and advance the current debate, and we hope to work constructively with the Environment Agency to develop an effective strategy for River Basin Planning.