

## Consultation on draft River Basin Management Plans Blueprint for Water Response – April 2022

*Wildlife and Countryside Link is a coalition of 65 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.*

*Blueprint for Water, part of Wildlife and Countryside Link, is a unique coalition of environmental, water efficiency, fisheries and recreational organisations that come together to form a powerful joint voice across a range of water-based issues.*

This response is supported by the following Link members:

- Angling Trust
- British Canoeing
- Buglife
- Friends of the Earth England
- Institute of Fisheries Management
- Marine Conservation Society
- National Trust
- RSPB
- Salmon and Trout Conservation
- Surfers Against Sewage
- The Rivers Trust
- The Wildlife Trusts
- Waterwise
- Wildfowl and Wetlands Trust
- WWF-UK
- Zoological Society of London

For further information, please contact Wildlife and Countryside Link:

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## Implementing the plan

### 1. What are your views of these principles? When thinking about your answer, you may wish to consider how easy (or hard) you would find adopting the principles.

Blueprint for Water welcomes this consultation from the Environment Agency on the draft River Basin Management Plans (RBMPs) and the opportunity to share our key concerns and priorities.

As statutory plans, RBMPs are key in confirming societal ambitions for the water environment and setting out mechanisms that will see these ambitions achieved. Yet to fulfil this role, the plans should reflect the transformational change that is needed to bring coherence to efforts to transform the state of our waters.

A step change in ambition is needed. Currently, just 16.2% of waterbodies (and only 14.6% of rivers) meet Good Ecological Status in England, despite WFD targets for all to achieve good status by 2027. 0% meet Good Chemical Status – and targets in the draft plans suggest that we won't see all waterbodies achieving good status until 2063.

We are supportive of the principles set out in the draft RBMPs. However, we are concerned that the draft plans do not set out how they will deliver this crucial step change. The ambition, strategy and detail underpinning each of the principles remains unclear. For example, *'promote restoration and recovery of freshwater, estuarine and coastal habitats and species'* is laudable, however, Environment Agency data from 2019 suggests that over 400 waterbodies have deteriorated in ecological status by at least one class since 2015 and several waterbodies have been and continue to be removed from the regulatory sampling scheme. Few water-dependent Protected Areas meet their objectives despite a requirement to achieve this by 2015 under the original Directive. The RBMPs should clearly set out why the plans have failed thus far to bring all waterbodies to good status, and to achieve compliance with legislation on Protected Areas, and how these draft RBMPs will make the required improvements.

Further detail is required to set out how the principles will be delivered, and how they will drive improvements for waterbodies. For example, we would like to see greater detail on how the principle of *'working with natural processes'* will be embedded. Applied correctly, nature-based solutions provide multiple benefits in both rural and urban landscapes, but their success requires a strategy that targets delivery, captures multi-sectoral involvement (environmental NGOs, water industry, Local Authorities etc), pools resources and expertise and draws upon a diverse range of funding sources. Without this, we will not achieve step change, at scale.

Similarly, *'Take account of future and changing risks to delivery'* requires a strategy that is underpinned by quantitative information. Building an environment resilient to climate change, for example, requires an understanding of the future availability of water resources both spatially and temporally. Without this, *'measures that help natural assets cope with or recover from shock'* cannot be optimised.

The wording of the principles should be strengthened to reflect the level of ambition required. For example, *'Promote restoration and recovery of freshwater, estuarine and coastal habitats and species'* should say **deliver**, and *'Public bodies should ensure the environmental objectives of the plans are integrated in their processes and plans'*, rather than *reflected*.

Further, a *'collaborative place-based approach'* should explicitly reference the need to understand the water environment, and plan and deliver interventions, at a coherent landscape scale. Taking a catchment-based approach will offer the best opportunities for understanding the scope to deliver habitat restoration from source to sea, implement nature-based solutions which limit carbon emissions and deliver against wider objectives such as flood risk reduction, and build catchments which are naturally resilient to future pressures such as climate change.

## Objectives

### **2. Do you agree with the environmental objectives in the draft plans? Which, if any, objectives would you like to see changed and why?**

The draft RBMPs need to set out how they will deliver a step change for the freshwater environment. We are concerned that the environmental objectives set out in the RBMPs are simply a continuation of existing processes and approaches, which as stated have thus far failed to bring all waterbodies to good status. Where the draft plans do suggest ambition, they lack the necessary detail to understand how this will be implemented. The plans should clearly set out why failures have not been addressed, and how these objectives will drive improvements. Further detail is also required on what funding will be used to deliver these objectives.

For example, the objective of *'preventing deterioration of the status of surface waters and groundwater'* is currently not being met. Further detail is required to set out what will be done to address failures, how actions will be prioritised, and on what timescales.

Of particular concern is chemical status – as discussed, not a single waterbody in England meets good chemical status, and current targets do not expect all waterbodies to achieve 'good' until 2063. The objective *'cessation of discharges, emissions and losses of priority hazardous substances into surface waters'* will not address the numerous other chemicals (beyond the few priority hazardous substances (PHS)) that are ubiquitous within our fresh and coastal waters. Chemical status may be defined in regulatory terms by a handful of chemicals, but actual status and the risk to both aquatic ecosystems and public health are determined by the presence of literally hundreds. Moreover, several of the PHS are banned or phased out; their emissions will have already ceased, meaning that 'cessation' must not be the sole focus if we are to achieve the desired improvements to our water environment. The Government's forthcoming Chemicals strategy needs to set out a framework for tackling chemical pollution across all sectors, a wide range of chemicals, including mixtures, encompassing improved monitoring, stronger policy and legislation, control at source and measures to address once released into the environment.

## Programmes of measures

### **3. Are you aware of any funded measures that are missing from the programmes of measures? Please let us know what measures are missing**

The programme of measures and mechanisms summarise a huge range of policy, regulation and investment programmes. Nevertheless, good ecological status is currently only 16.2% (just 14.6% for rivers) and good chemical status 0%. Existing measures are not, therefore, being implemented or enforced with sufficient rigour or resourcing.

Moreover, the list of measures by sector doesn't indicate that the necessary strategic approach is being adopted. Further detail is required, setting out how implementation of measures is being prioritised. We suggest that further assessment and analysis of the measures is required, for example, to set out which measures need to be applied where in order to achieve good status, to show where measures haven't achieved this, and to show how collaborative delivery of measures can achieve larger, more holistic outcomes. Gap analysis should also be undertaken, to assess for any potential missing measures.

As with principles and objectives, missing from the plans is detail setting out how the measures listed will drive improvements for the water environment, where previously they have failed.

### **4. Do you have any comments on the potential new measures set out in the draft plans? Please tell us about any other new measures that could be taken forward with support from partners to achieve the objectives in the plans.**

The list of potential measures is extensive. However, the plans do not provide any assessment of how effective they would be or of how they will contribute to achieving good status. This provides little indication of prioritisation; of how crucial these measures might be in closing the delivery gap.

We would welcome in particular the adoption of measures focussed on biodiversity and habitat restoration, reflecting the greater challenges facing freshwater species compared with any other group, and question why some of the preventative, 'no regrets' measures that would support this, such as greater action on INNS, are not suggested as pre-2027 measures.

Similarly, we advocate for measures that deliver more holistic management of water within the landscape. For example, measures concerning Sustainable Drainage Systems (SuDS) are welcome, but need to go further, such as through the removal of the automatic right to connect surface runoff from new developments to the sewerage system and implementation of the SuDS provisions in Schedule 3 of the Flood and Water Management Act 2010 to make SuDS compulsory for all new developments.

Overall, it is unclear *why* the measures listed are currently 'potential'. For example, are there barriers to delivery such as a lack of funding? There is limited detail on any mechanisms that might be established to enable 'potential' to become 'realised'.

## Working at the catchment level

**5. Do you have any comments on the challenges and measures suggested as priorities in your local catchment partnership's page? Please give catchment specific examples and tell us where, by working together, more benefits can be achieved.**

N/A – Blueprint for Water are responding to the draft River Basin Management Plans at the national level.

**If your response is regarding a specific catchment partnership page, please type the name below.**

N/A.

## Updating the plans

**6. Do you have any further comments on the draft river basin management plans, not covered by the previous questions?**

Our [Blueprint for Water 'Vision'](#), published in 2021, set out the importance of bold River Basin Management Plans driving action for the entirety of the freshwater landscape, going beyond the building blocks of the Water Framework Directive to drive ambitious action at catchment and landscape scales. The catchment-based approach, and making full use of nature-based solutions (NBS), must be at the heart of RBMP delivery.

It is important that the actions and priorities set out in the River Basin Management Plans are integrated across and work with other policies, plans and legislation in order to holistically drive improvements for the freshwater environment. For example, objectives delivered through the Flood Risk Management Plans (FRMPs)- such as delivering natural flood management and NBS at scale - should help to achieve the objectives set out in the RBMPs. We expressed support for measures within the FRMPs that specified linking to RBMPs in our [Blueprint for Water response](#) to the recent FRMP consultation.

Building on recommendations from the Glover Review, strengthened management plans for protected landscapes and national parks should act as exemplars for a large-scale systems-based approach to the water environment – in doing so, they should make a greater contribution to the delivery of RBMPs. This should be embedded across protected landscape management approaches, given the importance of a healthy, resilient freshwater environment for nature's recovery, ecosystem services, and our own health and wellbeing.

RBMPs should also reflect the ambition of local partners articulated within Catchment Plans and Local Nature Recovery Strategies, as well as national target and priorities.

Finally, we note the plans to update the NWEB Survey which underpins the cost benefit analysis within RBMPs, and ultimately determines their ambition. Whilst this proposal is welcome, it is disappointing - given the greater value placed by society upon the natural environment, including

due to the COVID-19 pandemic, and the greater awareness of and concern for the climate and biodiversity crises - that this update will not take place in time to inform the ambitions of the 3<sup>rd</sup> round of RBMPs. Without this, we risk a set of plans that do not fully reflect, and deliver against, the ambitions of society.

## About you

### **7. Are you responding as an individual or on behalf of an organisation or group?**

Responding on behalf of an organisation/group – Blueprint for Water, part of Wildlife and Countryside Link.

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### **8. Contacting you about your response**

**In some cases, we may wish to follow up a consultation response where there is an offer of help or provision of evidence. If you're happy for us to do so, please provide your details below. We can also use it to let you know when we have published the Summary of consultation responses document.**

#### **Name**

Ellie Ward, on behalf of Blueprint for Water

#### **Email address**

[eleanor@wcl.org.uk](mailto:eleanor@wcl.org.uk)

### **9. 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).

### **10. If your response relates to a specific management catchment, please write in the box below**

N/A.

**11. Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity.**

Yes.

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

Government website. Meetings/calls with the Environment Agency. Email from the Environment Agency