

Wildlife and Countryside Link response to the River Basin Planning: Working Together consultation, March 2007

Background

Wildlife and Countryside Link (Link) brings together 37 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 and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of over 8 million people in the UK.

Wildlife and Countryside Link (Link) is entering this response as a joint national response across all 10 River Basin Districts (RBD) in England and Wales, as well as copying it to Environment Agency staff nationally. In addition to this national response, individual responses from representatives on liaison panels will be submitted.

Link has been extensively involved in the planning and early stages of Water Framework Directive (WFD) River Basin Planning. We have engaged in extended discussions with the EA, Defra and other stakeholders over appropriate mechanisms for delivering river basin planning, including detailed consultation responses and numerous meetings with key Agency staff over many years. When the liaison panels were established in 2006, Link facilitated meetings in each RBD at which the Link members could select representatives and decide how to work together collectively in that RBD. This constructive approach to joint working was widely welcomed at the time.

Our comments are therefore based on both the views we have developed through many years of involvement in these issues at a national level, and through extended discussion with liaison panel representatives from Link members and our partners in the Blueprint for Water coalition.

This response is supported by the following organisations:

- Buglife – the Invertebrate Conservation Trust
- Herpetological Conservation Trust
- Marine Conservation Society
- The National Trust
- Pond Conservation: the Water Habitats Trust
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- WWF-UK

Overall views

There are a number of aspects in the proposals which are encouraging, including the support for liaison panels, and the suggestion that meetings, task and finish groups, and stakeholder-led forums have a role to play. However, taken as a whole, the 'Working Together' documents are highly disappointing. After many years of planning for the implementation of WFD, the documents suggest that the Agency is retreating to a largely "Business as Usual" approach to engagement. It is far from clear that this will deliver the active involvement required by the Directive. The Working Together documents are incredibly thin on detail or any kind of specific proposals, and this makes it extremely difficult to evaluate the approach that is being proposed. For a process of this importance, the lack of detail is striking.

We believe that there are a number of areas that require urgent attention if an adequate engagement process is to be established.

1. The need for catchment plans and structured local engagement

River Basin Districts are very large areas indeed, and cover a scale at which meaningful local engagement is impossible. It is vital that River Basin Districts be sub-divided into more manageable units, and a structured process of engagement set out for each of these. There have been repeated commitments from the EA on the importance of local or catchment scale planning, including the statement from Sir John Harman as recently as November 2006 that 'local consultation is hard-wired' into the EA's arrangements for WFD. However, these proposals bring forward no detail as to how this will be done. This leads us to question whether such engagement is being taken seriously.

As the proposals note, the correct local approach will vary from one area to another within a RBD. However, no attempt is made to suggest which approach will be most appropriate for each area of a RBD. In which catchments will EA led processes be used, and in which will there be stakeholder-led or new forums? For example, CAMS groups are referred to, and we believe that strong possibilities exist to develop these into mechanisms that would allow for effective local engagement. However, in the documents, these groups are simply listed, with no plan or details set out for how they might be used to facilitate engagement.

The sub-division of RBDs and the development of detailed, structured local engagement plans is a very high priority. We do not believe that the active involvement required by the WFD can be delivered without this.

2. Interface with other planning activities, especially EA plans and processes

The proposals list the many plans which are relevant to the WFD, but there is no detail on how the WFD planning process will actually engage with them. This is most critical with respect to the EA's existing water-related planning activities such as CFMPs, CAMS, and Fisheries Action Plans. How is it envisaged that consultation around WFD will interface with these plans? Is the intention to create another layer of consultation, or has thought been given as to how some form of streamlining might be achieved? Significant possibilities clearly exist to reduce bureaucracy and stakeholder fatigue, but no thought appears to have been given to these. The first principle set out in the EA's Framework for River Basin Planning in England and Wales is to "integrate and streamline plans and processes". These proposals take that no further.

3. The need for proposals on delivery

The proposals set out currently focus entirely on planning and consultation, with no thought apparently given to how and by whom implementation is to be monitored, nor any kind of proposal for local joint-delivery mechanisms. It is telling that the envisaged consultation ends in 2009. Some proposals as to how local co-delivery is to be planned, delivered and monitored are required.

Answers to specific consultation questions

1. Does the proposed timetable allow the right amount of time for the different stages and tasks?

Yes

2. To what extent are the access to information and consultation arrangements described here sufficient to meet your needs?

Access to information seems fine. Consultation arrangements more generally are considered below in answers to questions 5 and 6.

3. Which organisations should be added to the table of public, private and voluntary sector organisations?

See local responses.

4. Have we missed any plans and strategies relevant to RBP?

The lists are comprehensive; however, there is a lack of any kind of detail as to how WFD will actually interact with these plans (e.g. water company periodic review processes). This is particularly striking where these are EA led plans. We believe that a considerable opportunity for streamlining and simplification is being missed.

5. To what extent do you agree that our preferred option for using organisations and networks is an effective approach to involving people in river basin planning?

Answer: 1, strongly disagree. See above discussion.

The plans talk vaguely of using Agency or Stakeholder-led processes or creating new forums. This spectrum is *in principle* fine. However, absolutely no detail is given as to which of these many options will *actually* be used in any given locality. The Agency has had several years in which to consider how it will deliver local planning for the WFD; the current consultation suggests that we are still nowhere near to any concrete proposals.

There is now a very urgent need for clear plans to be advanced for a structured programme of local engagement in each RBD. The 'Working Together' documents offer only a vague shopping list of possibilities. At this late stage in proceedings detailed and specific proposals are desperately required.

6. To what extent do you think the participation methods will achieve adequate stakeholder involvement in River Basin Planning?

Once again, the range of possibilities presented (publications, events, electronic communication, meetings, surveys, and groups) are in principle fine. However, much greater detail is needed on the extent to which these will be used.