Blueprint for Water
WATER PEOPLE NATURE

Wildlife and Countryside LINK

Challenges & Choices - December submission

Blueprint for Water welcome the opportunity to engage in the Challenges & Choices consultation. This high-level submission represents our initial response and will be followed by a further response discussing some of the areas in more detail. As such we have not answered every question in this initial response; this should not be taken to imply that we do not have an interest in those areas. We hope that our initial contributions will be valuable.

This response is supported by the following organisations:

- Angling Trust
- Institute of Fisheries Management
- RSPB
- Salmon & Trout Conservation
- The Wildlife Trusts
- The Rivers Trust
- Waterwise
- Wildfowl & Wetland Trust

The Water Story

Q1. The way we treat water today will shape all our futures. What changes can you make to improve the water we rely on?

- We must all do more to recognise the interrelationships between multiple stresses that affect the freshwater environment – when considering how to deal with these we must also look for the scope for solutions to answer multiple stresses, for example dealing with flood flows also reduces pollutant-rich runoff, limits the transport of invasive species, and so on.
- Freshwater biodiversity is in decline not just in the UK but globally. International research confirms that to tackle freshwater biodiversity loss (in line with national and international frameworks) requires prioritisation at a local level.
- We must work collaboratively, considering how to realise the synergies between Public sector targets, and the ambitions of sectors outside of Government.

Overarching Challenge - The Climate and biodiversity crisis

Q2. 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?

- We need to accelerate the implementation of both strategic and specific actions to manage catchments in ways that reduce freshwater pollution, improve water quality and regulate the quantity and timing of flow. Nature-based solutions are increasingly recognised as an essential approach to water management and we must restore wetlands and rivers, including managing water flow patterns, in ways that promote

ecosystem processes. Restoring and rewetting drained peatlands is a key nature-based solution to climate change, with the scope to lock up carbon, benefit biodiversity and enhance human well-being. Restoring wetlands and tidal marshes can protect coastal cities from storm surges and erosion. However nature-based solutions are too infrequently incorporated into strategic or project plans. For example, flood risk management projects are often conceived in isolation from the wider catchment, missing opportunities to integrate working with natural processes alongside traditional engineering solutions.

- We need to increase public and private investment in nature-based solutions for climate-related water risks, such as extreme floods and droughts (as well as for solutions to challenges covered in other chapters; many solutions will be multi-functional). The water sector in particular has a role to play in terms of climate change mitigation: nature-based solutions to water treatment potentially offer significant advantages in terms of biodiversity, construction cost and energy use, and more effective measures to drive water efficiency will reduce greenhouse gas emissions associated with pumping and treating water.
- Water can only be managed sustainably if all water users in the river basin work together: all public bodies, water companies, local communities, businesses, and land and water managers. This requires new governance structures that embed the value of water, carbon and nature into business planning. For the private sector, water is both a risk and opportunity, whether for corporate headquarters, manufacturing facilities, supply chains, or in the fields were raw materials are grown. But businesses are also uniquely positioned to champion innovative solutions to freshwater challenges, demonstrating visionary leadership that secures water for the good of the business, people and nature. More businesses need to go beyond adopting water efficiency practices to becoming better water stewards.
- To achieve the holistic collaboration of stakeholders described above requires multi-stakeholder engagement combined with spatial planning. There will be significant potential benefits in integrating river basin management planning with similar processes for planning and prioritising environmental land management and delivery under Local Nature Recovery Networks.

Q3. 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?

- The restoration and recreation of wetlands, such as reedbeds, wet meadows and wet woodlands**,** will make a significant contribution to securing biodiversity, healthy functional ecosystems and the provision of ecosystem services, as well as being crucial to the protection and enhancement of rivers, lakes and other freshwater habitats. In particular, the ecological and ecosystem services value of floodplains need to be better recognised.
- Habitat restoration and creation should be planned and prioritised through a spatially mapped Nature Recovery Network (NRN), informed by the local knowledge of Catchment Partnerships, and funded by a combination of sources including WFD-focussed funding, Environmental Land Management payments from Government, Water Industry and other sources, Flood Risk Management Funding and through developer-funded delivery of Biodiversity Net Gain. Together, this spatial planning and framework integration can deliver the “step change in how we plan and coordinate investment and action” that the biodiversity crisis demands.

- Connectivity is a key attribute required for healthy, functioning ecosystems. The prioritisation of projects or proposals mapped through a NRN could be used to enhance connectivity, both directly (e.g. fish passage projects which improve physical connectivity, and enhancements to lateral connectivity by reconnecting rivers with their floodplains) as well as by considering the quality of connected habitats. For example, a river restoration project may be more valuable if it links upstream and downstream areas which have already been restored, as it increases the area of connected *high-quality* habitat.
- Shifts in wider land management practices will also make a major contribution, given the impacts of agricultural land management on the freshwater environment. Achieving a shift to more sustainable land use and management will require much greater uptake of Catchment Sensitive Farming approaches, with regulatory requirements better enforced, and further voluntary approaches supported by advice, guidance and appropriate funding. The Nature Recovery Network should also have a key role in identifying the most critical places where land use change can play a key part in biodiversity recovery, as well in the provision of ecosystem services like flood mitigation.
- As the in-channel opportunities to improve freshwater biodiversity are progressively realised, focus must shift to other freshwater habitats including lakes, estuaries and coastal waters, underpinned by a shift in focus that favours the restoration of natural processes as the most sustainable footing for biodiversity recovery. Both cost and technical feasibility have limited action in these waters to date; to counter this, natural ecosystem function should underpin a 'no-regrets' approach to restoration.
- The mapping of opportunities must also take account of benefits to the estuarine and in-shore coastal environment given the remit of River Basin Management Plans for transitional waters and extending out to 1 nautical mile offshore; not all Catchment Partnerships have included the coast when planning and prioritising projects, particularly in areas where coastal Partnership are active; both must feed in to the spatial prioritisation via a Nature Recovery Network as this may alter the priority of land-based projects which also benefit the marine environment.
- The reduction of damaging abstraction is necessary to recover biodiversity of both river systems and wetlands. The proposals set out in the Environment Bill are a welcome start but faster action is needed both via licence modification (and potentially with voluntary approaches playing a part where changes cannot be brought in sooner), and greater action on water efficiency in order to reduce abstraction needs.
- The anticipated renewed focus on species conservation is welcome, with the recovery of many declining freshwater and wetland species requiring action beyond that driven by WFD delivery alone. Species conservation projects offer opportunity for public engagement and involvement, providing a valuable means of engaging stakeholders in freshwater biodiversity issues.
- Whilst some species benefit from habitat-focussed work alone, others will require more significant interventions including the control of invasive non-native species (See Qs 11 – 13), or reintroductions. Whilst more resource-intensive, the wider biodiversity and ecosystem services benefits of these approaches (e.g. reduced predation of salmonids by mink when removed to benefit water vole, improved water quality and moderation of flood peaks in rivers downstream of beaver sites) should be used in their justification.
- We also welcome the proposed renewed focus on small waters such as ponds and headwaters (discussed in Q4) which house a disproportionately high portion of

freshwater biodiversity given their size, and on the control of diffuse water pollution impacting upon specially protected sites (Q19 & 20)

Q4. 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?

- WFD targets have, despite the slow rate of achievement, been valuable in driving action. Some aspects of improving our freshwater environment are not well promoted through WFD targets and would benefit from additional statutory backing. In particular, small waters are a valuable component of the freshwater biodiversity resource which largely fall outside of the WFD monitored network and can be overlooked in terms of funding and delivery, so targets promoting their protection and restoration and re-creation would be beneficial.
- The equivalent of good status should be defined for a range of small waters including ponds, small lakes and headwater streams, and targets should be used to inform a catchment-scale Programme of Measures that could be delivered in parallel to that for WFD targets.
- A target to rectify connectivity would also be valuable, given the large proportion of rivers that are partly or wholly disconnected from their floodplains. The restoration of function floodplains would support wider habitat and species recovery ambitions; for example, on salmonid fish.
- The Nature Recovery Network (Q3) should be used both to identify areas where the creation and restoration of small waters should be undertaken, and to incentivise delivery, acting as a guide for all funders (from Grant-making Trusts to statutory schemes like ELMS) who should favour proposals that are in line with the NRN maps and plans.
- These targets could be set through the Environment Bill and would support achievement of many of the aspirations of the 25 Year Environment Plan

Challenge 1: Flows & levels

Q5. What can be done to address the challenge of changing water levels and flows?

- Initiatives that reduce water waste at the community level (such as Southern Water's community initiative) should be developed in partnership by water companies & stakeholders and championed by the water industry. The value of such initiatives lies not only in the water saved, but also in the educational / behavioural change impacts.
- Temporary Use Bans (previously 'hosepipe bans') should be reviewed to increase their effectiveness, and their use as part of a sustainable water management regime should not be penalised.
- Beyond this, reducing water usage requires policy change (government initiatives / regulation / financial support) to drive / champion, underpinned by better water labelling, and initiatives to increase public awareness around water saving approaches (e.g. leaky loos, water efficient hardware, water saving initiatives such as rainwater harvesting)
- Regional Water Resources Planning will help to embed an outcome-focussed approach to water resources management, for example with Water Resources East considering the needs of the water industry, other abstractors and the environment.

This is welcomed and will support the identification & development of local solutions such as water storage and sharing, at a Catchment level.

- Where Water Level Management Planning relying on voluntary approaches to meet the water level requirements of protected sites has failed, alternative measures including incentivisation, and enforcement where appropriate, should be considered.
- It is important to factor in the interaction between low flows and other pressures during decision making. For example, nutrient and pollutant dilution is limited by low flows, physical habitat in poor condition is less able to cope with low flows, etc. These compounding factors support the case for holistic action.

Q6. 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 the climate continues to change, adaptation to achieve long term sustainable land use and land management will need to be addressed. For example, the growing of particularly water-hungry crops in the south and south east may no longer be sustainable.
- The Environment Bill, when adopted, will create the ability to remove or change environmentally-damaging abstraction licences without the need to pay compensation. This power is extremely welcome but with changes affecting only licences modified after 2028, Blueprint are advocating for an amendment to the Bill to enable action to be taken sooner. In the absence of this, voluntary measures akin to the Water Industry's 'Abstraction Incentive Mechanism' should be employed in the interim.

Q7. 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 need to go further if we are to re-establish a 'good' water environment, including by factoring in adaptation to a future climate. Using novel technology or nature-based solutions (e.g. biodiversity-rich storage reservoirs for irrigation) will play a part.

Challenge 2: Chemicals in the water environment

Q8,9,10. We will discuss this topic in our more detailed response, to follow.

Challenge 3: Invasive non-native species

Q11. What can be done to address invasive non-native species?

- Government should establish an Invasive Non-native species Inspectorate providing more wildlife officers and enabling increased prosecutions for the release of INNS. They should have responsibility for implementing stricter border control checks for

INNS at entry points to GB, prohibiting the import or export of potted plants unless in a sterilised medium, and reducing INNS being spread through online trade

- Funding to manage invasive non-native species should be increased in line with the Environment Audit Committee's recommendations from the current £0.9M to £3M. This funding should ensure that rapid response systems are in place to eradicate new INNS, support local action groups, and support the implementation of Pathway Action Plans. The management of invasive non-native species should also be supported through a new Environmental Land Management Scheme (ELMS)
- Further efforts to raise awareness and encourage good biosecurity (see Q12) should be underpinned by a Clear and easy reporting system for INNS which enables effective management of invasive non-native species at the catchment scale, linked to the Catchment Based Approach.
- Policy or legislative changes should include following the lead of other countries in bringing forward legislation (promised in 2018) to allow accession to the Ballast Water Management Convention, and ceasing the commercial trapping (i.e. for the restaurant trade) of particular invasive species including Signal crayfish (*Pacifastacus leniusculus*) and Chinese Mitten crab (*Eicheir sinensis*). The exemption to allow in-water cleaning of lightly fouled boats should be removed, and Schedule 9 of the Wildlife and Countryside Act (1981) should be revised, using advice in the 2015 review. Conditions on INNS and biosecurity should also be included in all aquatic planning responses.
- Where new priority INNS have been found, movement restrictions should be imposed, and funding and guidance should be available to support post-invasion restoration
- Increased funding should be made available to support research on INNS, including on biocontrol and management measures.

Q12. How would you promote Check, Clean, Dry to all recreational users of water, including those who are not in clubs or attend events?

- The Environment Agency should increase engagement with relevant sectors, including via holding awareness-raising events, and engaging with retailers that sell recreational equipment (both in-store and on-line). This will require the allocation of a sufficient marketing budget.
- Check Clean Dry materials should be displayed at televised sporting events and popular recreation sites, plus recreational sports celebrities should be used to promote the campaign.
- In order to raise broader awareness of INNS amongst the public, INNS should be included in the school curriculum and in that for scouts and guides.

Q13. Are there any barriers stopping you adopting good biosecurity when you are in or near water?

- Two key barriers that impact biosecurity are short time frames between site visits (which may apply to recreational users, operatives from water-based sectors such as the water industry, and volunteers from Local Action Groups) and the lack of cleaning facilities or clean running water at water bodies. These factors make it difficult to be sure that equipment is clean when moving between sites.

Challenge 4: Physical modifications

Q14. What can be done to address the physical modification of our rivers and coasts?

- Existing work to identify and remove unnecessary/defunct structures, and enforcement to deal with unconsented works, must continue. This work must be adequately funded.
- Preference must be given to schemes which utilise nature based solutions / natural flood management wherever possible; it will not always be possible to adapt to climate change and the pressure to implement hard engineering solutions in order to attempt to do so must be resisted; we must instead think in terms of mitigating the impacts of a changing climate, and select solutions which work *with* nature.
- Where new structures are required, their impact upon freshwater ecology can be reduced by requiring the installation of fish passage measures (rather than 'making provision for' them), as is already the case for European Eel.

Q15. 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?

- Spatial planning must prevent development on floodplains, and measures to ensure sustainable land use (e.g. arable reversion) and management (e.g. crop rotations) will be necessary to support our adaptation to the effects of climate change, helping to restore the functionality of some floodplains. High proportions of rivers are disconnected from their floodplain by embankments and flow control structures, limiting the scope of those floodplains to hold water during high flows and contributing to downstream flooding issues. This loss of connectivity must be reversed.

Challenge 5: Plastics pollution

Q16. What can be done to address plastics pollution in the water environment?

- We must support actions to reduce the manufacture and use of single-use plastics, such as The Plastic Pollution Bill (PPB), and measures to reduce plastic littering such as deposit return schemes. A large proportion of marine litter comes via rivers, washed in from the land or via drainage systems, highlighting the need for increased public awareness such as through 'Yellow Fish' schemes.
- We must also start preparing to deal with the plastic already in the environment. Measures such as water sensitive urban design (WSUD) and increased implementation of SuDS must be flagged for new developments, and should be incorporated into planning regulations, recognising the role that these measures play in filtration.

Q17. What actions should the Environment Agency take to reduce plastic pollution?

- Research led by Bangor University and Friends of the Earth found that microplastics were present in all UK inland waters tested, highlighting the need for widespread monitoring of inland water systems in the UK. Microplastics should be added to the list of pollutants regularly monitored in inland waters, requiring agreement of an accurate, repeatable, reportable method for microplastic quantification. The full consequences microplastics are having on organisms, ecosystems and human health, are not yet known, but we should not wait until any harmful effects are determined before seeking to understand the extent of microplastic pollution.
- This also highlights a broader point – plastics and microplastics have risen up the agenda but there are likely a range of other chemicals or mixtures of chemicals that are not currently monitoring for, meaning that we know little of their extent or impacts. We should continue to work on the identification and control of chemicals with our European neighbours post EU-exit, drawing on expert guidance, and must consider how to best deal with issues not covered under the remit of REACH.

Challenge 6: Pollution from abandoned mines

Q18. We will discuss this topic in our more detailed response, to follow.

Challenge 7: Pollution from agriculture and rural areas

Q19. What can be done to address pollution from agriculture and rural areas?

- We believe an increase in incentives for land managers, and regulation (such as Nitrate Vulnerable Areas and Water Protection Zones where appropriate) need to be introduced as a priority. The introduction of tailored Water Protection Zones will enable a focus on all sources of water pollution, not just agriculture. Regulation is an essential part of the wider policy package aimed at reducing diffuse pollution and national nutrient surpluses.
- The provision of advisory support is currently heavily reliant on the charitable sector, yet its value in spreading best practice has been demonstrated in numerous catchments, such as the Lugg, and across Scotland, with follow-up enforcement only required in a small proportion of cases. Advisory capacity should be increased accordingly.
- A short transition period will be needed to address systemic non-compliance with the new Farming Rules for Water, during which funding and financing should be made available to meet baseline good practice and regulators should establish a ‘polluter responsibility’ to take this up. Any such arrangement should not apply to practices which were already legal obligations, as compliance periods for these have already been allowed. This transition period requires appropriate, well-planned communication to encourage behavioural change.
- An increase in resourcing for monitoring and compliance will need to accompany any new regulations as well as the Government ensuring that available grants, loans and subsidies support the agricultural sector transition. We would not expect this to cost Government any more than the current support system

Q20. 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?

- A new Environmental Land Management Scheme should identify suitable options that fund farmers to genuinely deliver for nature, using the Tests & Trials process to explore options. Measures specific to floodplain management would be valuable to deliver biodiversity, water quality and flood risk management benefits in a coherent way.
- Farmer clusters should continue to be supported via an equivalent of the facilitation fund, as a means of promoting innovative thinking and joint working. Collaboration based on catchment geography will be of particular benefit to the water environment, and should be used, for example, to incentivise strategic Natural Flood Management measures, which will be more impactful if approached at a catchment scale .
- Adequate funding for innovation and research is required, and should be centrally coordinated, perhaps via the establishment of a body equivalent to UKWIR for the water industry.
- A greater focus on soil health is needed to benefit both productivity and the environment; water running off farmland carrying soil and agrochemicals is a major threat to production and has significant impacts upon the freshwater environment. Measures focussing increasing the organic content of soil will form a valuable part of the solution here.

Challenge 8: Pollution from towns, cities and transport

Q21. What can be done to address pollution from towns, cities and transport?

- For new development, the prioritisation for development of brownfield land that does not have high environmental, amenity or heritage value would support investment in sites to decontaminate land that could otherwise leach pollutants into our waterways. It is important that approaches to remediate sites ensure that any pollutants do not spread.
- Spatial planning for urban areas and transport infrastructure needs a sequential approach and should ensure water is given weight. New development must be evaluated across a catchment area, not in isolation, for linkages or bottlenecks within the system that result in pollution from inappropriate management.
- For existing developments, NOx emissions from urban areas and transport are a major source of atmospheric nitrogen deposition onto freshwater bodies and the Clean Air Strategy 2019 actions must be delivered as a priority to reduce these emissions.
- Evidence suggests that misconnections are a significant problem, particularly in urban areas. Often caused by inexpert plumbing, better awareness amongst householders and trades is required to prevent their creation, and initiatives like the ‘Outfall Safaris’ developed by the Crane Valley Partnership can be effectively delivered by Catchment Partnerships to identify and rectify existing misconnections.

Q22. 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?

- Impacts on water quality from a new development should be considered in the early stages of the design process and a greater emphasis on high quality design, both of buildings and places, is needed.
- Quantitative assessment and modelling of approaches could support the development of effective sustainable drainage systems, reducing pollution by ensuring that green and blue infrastructure are effectively integrated into new developments.
- Biodiversity net gain could also play a role where the replaced/restored habitat helps to regulate water flow. Environmental net gain with a specific focus on the services provided could enhance this. However, net gain must be *additional to* current requirements to deliver green and blue infrastructure.
- Measures such as green infrastructure, Water Sensitive Urban Design and SuDS must be made mandatory in land use planning. Green and blue infrastructure should be integrated through planning policy and mandatory in all greenfield development and brownfield redevelopments, recognising the role that these measures play in improving water quality as well as providing multiple benefits around biodiversity, greenspace, air quality and health & well-being.
- Effective monitoring and enforcement is necessary to ensure the impact of development is minimised.

Challenge 9: Pollution from water industry wastewater

Q23. What can be done to address pollution from water industry wastewater?

- Inadequate sewerage systems place our environment at risk today and in the future. With the challenges to the drainage and wastewater system we face due to future housing growth and climate change there is an urgent need to formalise and standardise how we plan properly for the future. Blueprint support mandatory drainage and waste water management plans welcome the framework requiring the creation of a Drainage & Wastewater Management Plan (DWMP) for each of the wastewater areas served by water companies in England and Wales.
- The Water Resources Management Planning process has resulted in the development of sophisticated approaches to modelling future growth and climate scenarios and their impacts on water availability. Innovative visualisation tools have also been developed to help stakeholders understand the problems and comment on potential solutions and trade-offs. Similar tools could be developed for DWMPs.

Q24. What opportunities exist for water companies to collaborate with other sectors and organisations on measures to improve the water environment?

- The DWMP framework identifies the need for collaborative planning. Local knowledge will help to inform effective plans, such as by identifying areas where misconnections are common or CSOs overspill frequently.

Catchment partnership working

Q25. How can local partnerships become more inclusive and representative of all of the stakeholders within their catchments?

- Included in Q 26

Q26. How can local partnerships achieve a better balance of public and private funding to support and sustain their environmental work?

- This year's CaBA Benefits report highlights that during 2018/19, for every £1 directly invested by Government, CaBA partnerships have raised £3.3 from non-Governmental funders. They have shown a year-on-year increase in their engagement with Water Industry, Local Authorities and Businesses, and as well as funding partnership delivery, some have begun to provide direct funding for partnership hosts.
- However, the expectation upon these partnerships is not matched by the level of support made available. It must be recognised that Catchment Partnerships, where well supported, are best placed to achieve some elements of water management. They are effective at securing collaboration and galvanising local action, but they are not a replacement for government investment in areas such as regulation and enforcement, and whilst voluntary approaches may be successful in places, policy and regulation must still provide the 'teeth' to support the efforts of local collaborative partnerships.
- The short-term nature of funding available to partnerships for core costs limits their scope to do more. A longer term, strategic approach to the funding of CaBA would address the challenge of job security faced by those working for host organisations, with the loss of staff being a significant risk to the movement, resulting in the loss of skills and relationships, and limiting the scope for participation with the partnership.
- Such an approach to funding would also enable the various CaBA Working Groups to continue with their role of championing CaBA to a range of key stakeholders. The Urban Water group, for example, has engaged more than 60 differing Local Authorities over the last 2 years. In short, therefore, greater funding for CaBA in the mid-term will help drive the already substantial gains in diversity and leveraging of funds realised to date.

Who pays?

Q27. 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?

- A barrier to effective protection of the water environment is the low level of compliance with baseline regulation in the land management sector. The regulation of land management should be 'regularised', ensuring that government oversight of land management matches the level expected for other sectors. This would improve standards of practice and reduce risks and harms in an efficient manner.
- We support the creation of a properly funded, well-coordinated and streamlined advice service that adheres to a set of clearly defined objectives set at a local level, integrating effectively with regional/national goals. This is critical to help farmers and land managers manage the change ahead, and to create a culture where they understand what is required, and why, for the successful implementation of basic rules and environmental incentives. There needs to be a strong link between incentives/advice (from accredited providers) and knowledgeable enforcement (with visits and monitoring undertaken by qualified inspectors). The major obstacle to effective compliance with existing regulation is the lack of funding for enforcement, and Government should recognise the significant cost savings associated with investing in enforcement.
- For rural pollution, we support a move over time toward the 'Five P' approach to regulation – where the 'potential polluter pays to prevent pollution'. We support this because strict application of the polluter pays principle is problematic in some circumstances, such as around the cost of improving slurry storage. In such situations, financial assistance for meeting the current baseline should be offered as loans. However, polluters should not be paid to meet the regulatory baseline, and a future Environmental Land Management Scheme should ensure that all land managers meet basic standards of practice and are then rewarded for efforts beyond this level.
- Beyond regulation and enforcement, where the cost burden should largely lie with the polluter, the benefits of a healthy freshwater environment are received by all, so should to some extent be funded by all. This means that government funding (via both direct funding through Defra bodies, and through a future land management scheme), and water industry investment (funded by customer bills) remain legitimate and key sources of investment. Other logical funding sources include developer contributions related to biodiversity net gain and green infrastructure provision, business investment through water stewardship or biodiversity commitments, green finance, and flood funds from sources including Local Authorities, Local Economic Partnerships, and local beneficiaries. Investment from the third sector, including via grant giving bodies, will also play an important role. The challenge is how to bring all of this together.
- The complexities of the freshwater environment mean that a spatially planned framework such as a Nature Recovery Network will be valuable for identifying where priorities align, and can therefore be used as a framework for the pooling of funding to deliver benefits which would not have been affordable without collaboration.