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Blueprint for Water

Response to Environment Agency River Basin Management Plans Consultation

The Blueprint for Water was launched in November 2006 by a unique coalition of environmental, water efficiency, and fishing and angling organisations to call on the Government and its agencies to set out the necessary steps to achieve “sustainable water” by 2015 and to fully implement the Water Framework Directive (WFD). The Blueprint for Water is a campaign of Wildlife and Countryside Link.

Wildlife and Countryside Link (Link) brings together voluntary organisations in the UK concerned with the conservation, enjoyment and protection of wildlife, countryside and the marine environment. Our members practice 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 over 8.3 million people in the UK and manage over 690,000 hectares of land.

We welcome the opportunity to express our views on the issues raised in the consultation. However we are concerned that many necessary measures are being delayed or disregarded because there is currently uncertainty about the funding and/or legal underpinning (for example powers being consulted on in the draft Flood and Water Management Bill). If measures are necessary to achieve Good Ecological Status (GES) these should be included and secured in the final plans as a target for ongoing work. We are concerned that in its present form Annex D does not provide sufficiently detailed measures to demonstrate that favourable conservation status will be achieved and we believe that catchment or sub-basin plans should be produced to ensure the effective implementation of measures.

This response is supported by the following 20 organisations;

- Angling Trust
- Association of Rivers Trusts
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Fish Legal
- Froglife
- Herpetological Conservation Trust
- Institute of Fisheries Management
- Marine Conservation Society
- The National Trust
- Plantlife International
- Pond Conservation
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust
- WWF- UK
- Zoological Society of London

1.0 Summary

1.1 Overall ambition and objectives

The Blueprint for Water (“the Blueprint”) welcomes Defra and the Environment Agency’s (“the Agency”) commitment to an increase in the level of ambition for the first round of the plans. We look forward to seeing the details about how increased ambition will be included within the final plans as we believe there is further work to be done before the plans comply with the spirit or requirements of the Water Framework Directive (WFD).

We feel strongly that ambition can only be raised if more effective and targeted measures are brought forward. We are concerned that many necessary measures are being delayed or disregarded because there is currently uncertainty about the funding available. If these measures are necessary to achieve GES then these should be included in the final plans and work should be ongoing to secure funding. Similarly we are concerned that measures will not be included because the legislation underpinning them is not yet in place.

Without new effective measures the plans will be little more than a statement of business as usual.

1.2 Access to information and participation

Feedback we have received from Non-Governmental Organisations (NGOs) and partners across the country unanimously indicate that it is almost impossible to understand and respond to the consultation documents. This is partly due to the complexity and layout of the documents and also to information gaps. However, it is also because the response pro-forma encourages stakeholders to provide comment for the River Basin Districts (RBD) as a whole rather than at the water body or river reach scale, where most individuals and local organisations hold information.

1.3 Certainty and Action

The Blueprint remains concerned that the inappropriate use of statistical certainty has constrained action and ambition. A ‘one size fits all’ approach of discounting any regulatory measures on an individual water body where the certainty of failure is less than 95% does not reflect local circumstance, for example, where a water body has high local significance or where the cost or impact of measure on a business is low.

We believe that expressing the confidence of classification as a percentage alongside or instead of existing broad statements of *low*, *medium* or *high* would be a more objective measure of confidence and would help strike a more sensitive balance between evidence and precaution. Furthermore, the plans (especially in Annex E) seem to confuse the use of *statistical confidence* with *the confidence to take action*. Where the term “certainty” is used it should be made explicit what is uncertain. For example, the effectiveness of a measure, the quality of data or the absence of biological monitoring.

We welcome statements from the Agency that a more flexible approach will be adopted in the final plans and look forward to receiving more details.

1.4 Ensuring success in implementation

While liaison panel meetings at the RBD level may have facilitated strategic discussions, the absence of any more local engagement has prevented meaningful discussion of the accuracy of the classification and identified pressures or the design of detailed measures.

The Blueprint believes there is a need to create more targeted management structures based around catchments and significant water bodies or groups of water bodies, for example, lakes, reservoirs, river reaches (as included in the management plans).

1.5 Identifying pressures and investigative monitoring

The failure to depict current water body status and pressures accurately has been reflected in research conducted by NGOs¹. There is an urgent need to work with stakeholders to identify a more sophisticated mechanism for identifying causes of failure of ecological quality elements, and incorporating data from Agency monitoring (WFD and other projects) and from other parties. This will be particularly critical in targeting cost-effective measures to address morphology, agricultural pollution, and urban diffuse pollution.

2.0 Detailed comments

2.1 Overall Ambition and Objectives

The current proposed levels of ambition predict an increase in the achievement of Good Status of less than 5% of water bodies by 2015. We do not believe the widespread application of derogations is compliant with the spirit or letter of the WFD.

We are delighted that both the Agency and Defra have acknowledged the need to raise the level of ambition, which was stated in their covering letter when the draft plans were launched in December 2008 and has since been repeated in subsequent statements and meetings. However, it is difficult to square this ambition with the recent announcement that all measures which are currently unfunded and/or not underpinned by current legislation are to be removed from the plans.

We also have significant concerns over the proposed phased approach. The presumption in the WFD is that all water bodies will meet GES by the end of the first cycle. Even accepting the fact that phasing is necessary with such low aspirations for this first River Basin Management Planning (RBMP) cycle, we question the plausibility of the Agency's stated targets for 2021 and 2027.

The tone of the consultation also suggests ambition will only be raised where co-deliverers bring new measures to the table. Although we agree co-deliverers have a key role to play, this does not reflect the legitimate concerns of stakeholders who might expect Government or Regulators to act on their behalf to improve water bodies in which they have an interest. Also, it does not encourage co-delivers to be ambitious.

Our view on action needed:

- All cost-effective measures required to meet GES should be included, irrespective of their current funding and legal status.
- The projected phasing should be front-loaded with significant early progress followed by slower progress later as more challenging and expensive measures are addressed. Central Government should be advised to adequately resource such an approach.
- The Agency should take a much stronger lead in highlighting the required actions where reasons for failures are understood. It should make clear that investment and/or regulation will be used if voluntary and incentive schemes will not deliver the required improvement.
- The plans should include a summary of the measures needed to bring bodies of water progressively to the required status by the extended deadline as stated in Article 4.4. (d) of the WFD.

¹ The RSPB 3 Rivers project – for more detail please see the RSPB response to this consultation.

2.2 Certainty and Action

We disagree that regulatory action should only be taken if the Agency is 95% confident the water body is rated at less than good status (see page 12 of Annex E). Although a few very costly measures may require a high level of certainty, this 'one size fits all' approach will rule out less costly measures which can and should be introduced in the first planning cycle.

Instead, we strongly advocate an approach based on a balance of evidence that would be more appropriate where the level of certainty should be proportionate to the sensitivity/importance of the water body and the potential expenditure or impacts on a specific sector.

Given our concerns, the Blueprint are pleased that Martin Booth has now given assurances² that the use of *High* confidence (95% probability that a river is at less than good) would be re-examined and that in many cases a balance of evidence approach would be adopted in its place. We welcome this approach and request written acknowledgment about how the wording in Annex E will be changed.

Since that discussion we have also become aware that a great deal of existing information (much of it funded by the Agency, Natural England and the Consumer Council for Water) is not being taken into account in the classification of water bodies and design of measures. As a result action is not being taken where the problem is already known. One particular example is the SSSI condition assessment information held by Natural England, where a water body is also a SSSI. This key information on pressures appears to have been ignored by the plans.

Our view on action needed:

- We believe that guidance should be provided on how a balance of evidence approach would be adopted in determining whether measures should be introduced.
- The confidence in the classification in the final documents should be expressed as a percentage and not simply as *high, medium* or *low* as the medium band (6-94%) is currently too wide to be useful.
- Plans should include details of the monitoring programmes required to increase certainty and identify causes of biological failure where they are not known (see investigative monitoring section). This is a requirement that is clearly set out in Article 4.4 (d) of the WFD.
- The Agency should carry out a comprehensive audit of existing information before finalising the plans and use the findings to improve certainty.

2.3 Planning and Implementation Structures

While planning at the RBD level may have facilitated strategic discussions, the Blueprint is concerned that this has prevented any meaningful discussion about the accuracy of the classification and the pressure identification, or the design of detailed measures. This has contributed significantly to the difficulty some groups have experienced in engaging with the process.

The high level overview that the plans adopt is also at the root of many of the struggles currently being faced in implementing the Directive, including the lack of certainty over pressures and measures, difficulties in using the Disproportionate Cost Analysis (DCA) process to prioritise, and failures to engage stakeholders more broadly. As a result the RBMPs are neither strategic documents nor detailed implementation plans.

² At the recent Defra Stakeholders meeting (27 Feb, 2009)

This issue will become more critical as we move into the detailed implementation phase for the WFD. A move to implementation process based around catchments (as included in the management plans) is vital.

Our view on action needed:

- The focus for implementation and review of the WFD should shift from the RBD scale to the catchment scale. This would facilitate more informed targeting and implementation of measures, and detailed investigation of the drivers of ecological failure.

2.4 Access to Information and Participation

Feedback from NGOs and partners from across the country unanimously indicate that the consultation documents are almost impossible to engage with or understand. This is leading to frustration and risks disaffecting individuals and organisations that are key to successful implementation.

There is a widespread view among stakeholders that much of the information held within the documents is difficult to find or assimilate in a meaningful way and that a number of key strategic issues are not clearly highlighted.

Environmental NGO stakeholders are finding that it is extremely difficult to comment meaningfully on individual water bodies, which are the basic unit for the Directive. The “What’s in Your Backyard” (WYBY) tool on the Agency’s website, although allows individual water bodies to be identified, is a cumbersome and coarse process and does not yield that same data as held within Annex B for each water body. There is currently no glossary of terminology and information is provided without any context or explanation. Many environmental NGOs would also benefit from having access to the Geographic Information (GI) data and there is no mechanism or current will to share this data. If this information was made available stakeholders could compare the WFD data and their own data which would allow more clarity on causes of failure and potential measures. Information on further planned improvements to WYBY and their timescales would also be welcomed.

In many cases stakeholders and co-deliverers need to request further information about individual water bodies. This is required to understand which pressures are preventing the achievement of GES, the actions that are going to be taken, and which actions have been discarded as either technically infeasible or disproportionately costly. Making this critical information more readily available would not only reduce the number of information requests made to the Agency but would also provide the vital background information necessary for many groups to develop and bring forward targeted measures. For technical infeasibility, more information would help increase access to data and information that has not yet being identified and we would encourage the collection of new data and information.

The Blueprint hopes the Agency will continue its good work in helping local groups by providing them with as much information as possible without charge.

Notwithstanding the above comments, we are concerned that information is either missing from the plans (in many instances the justification for not reaching GES by 2015 is not given) or in the case of the Heavily Modified Water Bodies/ Artificial Water Bodies (HMWB/AWB) designations were only released halfway through the consultation process. Both these issues raise serious questions about the validity of the consultation process.

We feel that these issues need to be redressed urgently as we move into the implementation phase. We welcome the fact that the Agency has acknowledged that public involvement does not end on 22 June 2009.

Our view on action needed:

- The plans should be made more accessible. This requires action both to provide clearer overall summary data, for example, on source apportionment by sector across RBDs, and clearer data at the local scale.
- At a strategic level we suggest the main plan documents should contain pie charts, diagrams and tables that clearly explain in simple terms the following, ideally showing each of these not only at an RBD level but also at the catchment scale:
 - The elements that are less than good status across the RBD.
 - Apportionment of pressures per polluting/damaging sector where this is known in order to demonstrate how the ‘polluter pays’ principle is being regarded.
 - The percentage of failures caused by a known pressure and the percentage of failures with an unknown cause.
 - The principal pressures causing the current status where it is below ‘Good’ across the RBD e.g. ammonia from sewage treatment works, channel modification, phytoplankton blooms.
 - The key measures proposed to address the main areas for failure.
 - The number of water bodies that have been designated HMWB/AWB and the percentage of each type of modification such as flood defence and navigation.
- More information is required in Annex B for individual water bodies. Specifically, which measures have been considered disproportionately costly, some detail on the reasons why a certain problem is technically infeasible, and what measures or investigations are planned. Where these assessments have been undertaken nationally they could be signposted to avoid duplication. Please find a proposed layout for Annex B in the attached Annex.
- For each measure listed in Annex C there should be targets related to improving the elements which cause the GES failure. Annex C tables listing measures should include a column headed “measure of success”. This should provide information about exactly what pressure is being examined and how the measure will be effectively addressed.

2.5 New Measures

Defra and the Agency have acknowledged the need to improve the level of ambition set out in RBMPs and have asked co-deliverers to come forward with measures in their responses. The Blueprint welcomes this acknowledgement but believes that Defra and the Agency should take a strong lead and be proactive in raising ambition.

Our view on action needed:

We believe the following will greatly improve the ambition and effectiveness of RBMPs:

- The most effective and ambitious Scenario C measures should be moved to Scenario B. In doing this, it would be extremely useful for the Agency to clearly demonstrate how measures will contribute to GES in water bodies and how they are being targeted. By identifying the most effective measures it should help the Agency and others prioritise where to concentrate efforts into increasing certainty and identifying potential funding mechanisms.
- A commitment to improved resourcing for existing enforcement should be made to ensure that the Agency make the most of its existing powers.
- We are extremely pleased that Defra and the Agency are developing proposals to establish a Catchment Restoration Fund. We suggest this Fund could provide match funding to approved charitable and voluntary bodies, as well as to the Agency, for restoration work. The Agency should also be given the necessary legal powers to carry out restoration activities.
- Powers to control aquatic invasive species should be bestowed upon Natural England, the Environment Agency, Internal Drainage Boards (IDBs), British Waterways and Local Authorities.

- We believe Water Protection Zones (WPZs) should be made available to tackle diffuse pollution in areas where it is clear that compulsory cross compliance, uptake of voluntary agri-environment and participation in other incentive schemes will fail to meet the WFD's environmental objectives.
- A second tranche of WPZ's should be prepared and delivered before 2015.
 1. Within the specific target areas of Natura 2000 sites where diffuse pollution or hydro-morphological pressures are preventing the achievement of Favourable Conservation Status.
 2. Where SSSIs that are classified as water bodies are being affected.
- Catchment Sensitive Farming (CSF) features prominently as a measure that will contribute to GES in the draft plans. Therefore, it would be helpful if the plans set out a clear rationale for where CSF is needed and what criteria will be used to prioritise and expand the programme in the future. It should also set out how the effectiveness of CSF has been assessed.
- The final plans should include significantly more detail about the measures including resources involved, targeted pressure, timing and spatial extent of each individual measure. The plans should set out measures and targets for water efficiency that reflect progress towards the Government's stated ambition to reach an average per capita consumption of 120-130 litres per person per day.
- The plans should also carry commitments for the revocation/amendment of damaging licences and signal the Agency's commitment to bringing significant unregulated abstraction into the licensing regime (e.g. navigation) and shift all licences to a time-limited status. Abstraction charges should also be raised to reflect environmental risk and scarcity value of water.

2.6 Heavily Modified Water Bodies

The mitigation measures proposed for HMWB's in the checklists appear broad and do not specifically relate to WFD objectives. Although we understand that this allows flexibility at a water body level it leaves uncertainty about how effective the measures are, how they will be applied, and most importantly what the likely biological outcomes will be.

On the spreadsheets containing information on HMWB and AWB, it is unclear who is responsible for bringing forward mitigation measures. We are concerned about the lack of transparency over how mitigation measures have been chosen and how their effectiveness is evaluated.

Our view on action needed:

- A clear and easily readable guidance document to the HMWB process, similar to the Agency's monitoring method statement is required. This document should outline the process of identifying the impacts of modifications on biological elements, the selection of mitigation measures and description of how they will be applied.
- The plans should actively set out a comparison between Good Ecological Potential (GEP) and GES to clearly demonstrate the ambition of the GEP targets.
- The final plans should clearly show the responsible party for delivering each mitigation measure, when it will occur, and where it will be targeted.

2.7 Annex D - Protected Areas

Some of the current measures for delivering Natura 2000 requirements lack detail in terms of what exactly they will entail and their spatial extent. They also lack clarity as to whether the timescales mentioned relate to implementation of the measures or the date by which they will produce the necessary improvement in the site.

We are concerned that some measures listed in Annex D are still listed as being in Scenario C. If these measures are needed to achieve favourable condition there is a clear legal obligation

to bring them forward by 2015. They should therefore be moved to Scenario B and be included in the final plans.

The deadlines and measures for Protected Areas in Annex D are not reflected in the corresponding 'water bodies' in Annex B and C.

Our view on action needed:

- All measures identified in the draft plans should be included in the final plans which require the movement of several measures from Scenario C to Scenario B.
- In the final plans, all measures in each Annex should be cross referenced to show the water bodies they will improve so that the full complement of measures for each water body can be understood. We feel the most effective way to do this would be to increase the amount of information in Annex B as stated above.
- Annex D should contain more detailed information on the exact nature and timing of planned measures for protected areas.

2.8 Annex E - Actions Appraisal

The decision making process outlined in Annex E lacks transparency. It does not clearly explain how the preliminary Cost Effective Analysis (pCEA) and Ministerial Guidance have led to the choice of national measures, particularly in relation to the disproportionate cost analysis.

The Annex does not clearly describe how the effectiveness of measures (in terms of contribution to the achievement of GES) were evaluated before they were discarded. It is unclear if the most effective measures have successfully been brought forward.

Our view on action needed:

- Annex E should set out a clear and transparent process describing how and why decisions have been made. It should include a clear and simple description of the main findings of the pCEA, and the Impact Assessment for the Ministerial Guidance. It should also describe how measures were selected and how disproportionate cost was determined. We believe that not only would this be helpful but it is also what is required to comply with paragraph 10.9 of Defra's River Basin Planning Guidance Volume 2.
- It would be helpful to have a clear comparison between the effectiveness of measures in the plan and the potential of those measures discarded in Annex E. For example, where Annex E lists measures discarded it states "other more worthwhile measures have been adopted". We believe these measures should be listed along with a brief statement about their effectiveness. This would allow stakeholders to cross reference and understand how decisions were made.

2.9 Economics

The benefits that will be created by Scenario C measures have not been modelled despite their costs being highlighted. Likewise, many of the other benefits, such as market and groundwater benefits, have not been estimated or monetised. We understand further work is being carried out by the Agency and Defra economists and we look forward to hearing progress on how more extensive benefits will be acknowledged in the final plans.

The main data sources for the cost estimates, such as the pCEA chapters, clearly stated that there was a need for further cost-effectiveness analysis at the local level. It is unclear if the Agency has addressed this problem. Given that major decisions on WFD implementation are based on these estimates, we find this unacceptable. We look forward to further information about how the Agency has or will address the acknowledged gaps in this process.

Our view on action needed:

- The plans should clearly state how much it would cost to achieve GES in all water bodies where the reason for failure is understood. This would make both the challenge ahead and the use of disproportionate cost clear and transparent.
- The Agency should make it clear exactly what steps are being taken to address the many categories of benefits that have not been monetised, such as market benefits.
- The final plans should clearly state the benefits of Scenario C measures.
- The plans should contain further information about how alternative financing mechanisms have been considered.

2.10 Monitoring and Classification

We are concerned that classification is not giving an accurate picture of the state of water bodies across England and Wales.

The link between biological and physico-chemical parameters is not fully understood. It is therefore difficult to make assumptions about how unmonitored elements would react. The Blueprint believes that this reinforces the importance of the one-out-all-out principle.

The plans in their current form do not address the issue of connectivity between water bodies. For example, there appear to be many anomalies in the fish classification with directly linked water bodies achieving very different classifications for fish often because of differing levels of biological monitoring. This also has links to the modelling of outcomes as tackling pressures on one water body may, in many cases, help improve others.

The Agency and Defra have stated in a number of meetings that a significant number of water bodies that do not meet GES are failing on phosphate alone. The Agency's own data shows that from the limited number of water bodies where both diatoms and phosphate are being monitored, 89% of phosphate failures are accompanied by diatom failure. There is no evidence that the application of the one-out-all-out rule to phosphate standards is having an unjustified or disproportionate impact on the overall classification of river status.

Our view on action needed:

- The one-out-all-out principle is a very effective method for ensuring effective standards in the water environment and should continue to be the basis for classification.
- Documentation should be produced to explain in a clear accessible way how fish classification is undertaken.
- Where classification is based on physico-chemical results alone this should be made clear in Annex B and the confidence assigned to the classification should be recorded as *low*.

2.11 Investigative Monitoring

A large number of water bodies either have an unknown reason for failure or only a medium or low confidence in the reason for failure. For all of these water bodies further investigative monitoring will be undertaken - details of what this means in practice are not given. We would be interested to know;

- How does the Agency define investigative monitoring?
- What resources are being put into this monitoring?
- How much time, on average, will be required to undertake this monitoring?
- Will this investigative monitoring be linked to new measures within the first cycle?

Our view on action needed:

- A note on investigative monitoring similar to the very useful monitoring protocol document produced by the Agency in December 2008 would help stakeholders understand what steps the Agency is taking to increase certainty.

- The Agency should report annually on the percentage of water bodies where cause of failure of GES is unknown so that progress can be assessed.
- The Agency should produce guidance on the preferred type and format of information it would like to see from third parties.
- The Agency should make every effort to ensure the final plans take on all available information about pressures on water bodies from local studies, with priority given to work that the Agency or other Government bodies have either funded or been partners in. For example, some aspects of Natural England's SSSI condition assessment will be important in identifying pressures where water bodies are also SSSI's.
- To adhere to the requirements of Article 4.4(d) of the WFD the plans should set out the planned improvements for all water bodies. This means that the final plans should include further details on exactly what actions will be taken for these water bodies with unknown reasons for failure.

2.12 Linkages with Other Plans

The Blueprint is concerned how RBMPs have been integrated with Flood Risk Strategies, Water Company Water Resources Plans, Environment Agency Strategies on such issues as Fisheries Action Plans, CAMS, Hydro-generation, and Development Plans, as currently this is unclear. All should take climate change and WFD into consideration.

There is insufficient focus on transitional and coastal waters, and a clear strategy is needed to link WFD/RBMP's with the Marine Strategy Framework Directive.

River Basin Management Planning also provides a unique opportunity to drive forward the Biodiversity Action Plan (BAP) process. BAP should be linked and BAP priorities should be given explicit reference and actions in the plans.

Our view on action needed:

- The inclusion of an Annex that outlines which plans have overlap with the RBMPs and clearly states how the objectives of WFD will be integrated with other planning processes would be a useful addition.

2.13 Dealing with New Developments (Article 4.7)

It is unclear how the requirements of Article 4.7 are being met by the plans and how developments that will lead to site deterioration will be listed.

Our view on action needed:

- There should be a clear statement about how the Agency will deal with developments that will cause deterioration in water body status.
- The Department for Communities and Local Government should produce clear guidance for Local Authorities on how to apply the Article 4.7 tests to new developments.

Blueprint for Water
June 2009

PROPOSED ANNEX B TEMPLATES

Water body Template

Type of Water body and Map Ref: RIVER 0001232

Surveillance Site: NO

Water Body name and ID:

Current Overall Status: Moderate

Proposed Overall Status: Moderate by 2015

Protected Area Designation: NONE

Biological Elements:

Element	Current Status and confidence in it	Predicted status	Reason for not achieving GES by 2015
Fish	Moderate (low)	Moderate (2015)	Technically Infeasible cause of fish failure unknown – investigative monitoring is underway
Invertebrates	Moderate (high)	Moderate (2015)	Measure Disproportionately Costly – failure due to hydromorphological pressure. River profiling works are disproportionately costly.
Diatoms	Poor (medium)	Moderate (2015)	Natural Conditions – Improvement is as fast as natural conditions allow

Physio-Chemical elements at less than Good:

Element	Current Status	Predicted status	Reason for not GES by 2015
Phosphate	Poor	Poor(2015)	Measure Disproportionately Costly – failure due to sewage work outflow, upgrading works would be disproportionately costly.

Chemical Status:

Assessment not required

Supporting elements potentially affecting Ecological Status of this Water Body

Flow is at Moderate status

Measures for this specific Water body:

Removal of weir from Upper Nowheresville to allow fish passage

Measure X on area Y

Measure Z on area B

Catchment targeted measure:

HYPERLINK

HMWB Template

Type of Water body and Map Ref: RIVER 0001232

Water Body name and ID:

Current Overall Status:

Proposed Overall Potential:

Modification Designation:

Reason for Designation: Flood Defence

Reason certain modifications cannot be removed (Significant Adverse Affect):

Flood Risk, removal of all structures would cause significant risk to human health and property

Protected Area Designation:

Ecological Status for None affected elements: Moderate

Ecological Potential: Moderate Ecological Potential

Biological elements:

Element:	Affected by Modifications	Current Status:	Status by 2015:	Justification for delay:
Fish	YES	POOR	POOR	Not necessary for GEP
Invertebrates	NO	MODERATE	MODERATE	Technically Infeasible cause of failure unknown – investigative monitoring underway, low confidence that Phosphate is the cause

Physio-Chemical elements:

Element:	Current Status:	Future Status:	Justification for delay:
Phosphate	Moderate	Good (2021)	Technically infeasible – Diffuse pollution is being addressed by a WPZ in this area but modelling shows improvements will only reach GES by 2021

Mitigation Measures:

Current and Future Hydromorphological Measures	Date of implementation	Reason for not implementing by 2015:
Removal of embankment at X Location	2011	
Realignment at X Cove	2012	
Removal of Weir at X	2017	Technically infeasible to remove this before 2015 due to the need to time works so they do not exacerbate flood defence issues

Chemical Status:

Not assessment - Assessment to be made by 2010

Supporting elements potentially affecting Ecological Status of this Water Body:

Specific Water body Measure to address elements not affected by modification:

Measure X on area Y

Measure Z on area B

Catchment targeted measure:

HYPERLINK