



[www.blueprintforwater.org.uk](http://www.blueprintforwater.org.uk)

Julia Simpson  
Environment Agency  
Apollo Court  
2 Bishops Square Business Park  
St Albans Road West  
Hatfield  
AL10 9EX

22 March 2010

Dear Ms Simpson,

### **Proposal to designate Lower Lee as Water Protection Zone**

We are writing from members of the Blueprint for Water coalition, in response to the proposals to designate the Lower Lee as a Water Protection Zone (WPZ). Whilst we fully support efforts to address diffuse urban pollution in this catchment, we have concerns about the proposal to designate it as a WPZ and feel that it may be an inappropriate site on which to pilot WPZs and prioritise limited resources.

It is our understanding that designating an area as a WPZ should be used when sources of diffuse pollution have been identified and voluntary measures (such as education and incentives) have failed to reduce the impact on the freshwater environment. This is an approach that the Blueprint for Water wholeheartedly supports. However, the letter you sent provides almost no information on the types or main sources of pollution on the Lower Lee. It also failed to suggest what mechanisms the Environment Agency or other expert bodies consider may be necessary and have used to control these. Without more detailed information it is very difficult to understand why this site has been selected as a potential WPZ or what controls over and above those already required by legislation could be introduced following designation.

We are not suggesting that the Lower Lee is not without problems. For example, the impact of non native invasive species on the river is an issue that needs addressing urgently. Sections of the river are completely dominated by floating pennywort, and Japanese knotweed, signal crayfish and Chinese mitten crabs are well established.



Wildlife and Countryside Link  
89 Albert Embankment  
London  
SE1 7TP

T: 020 7820 8600  
F: 020 7820 8620  
E: [enquiry@wcl.org.uk](mailto:enquiry@wcl.org.uk)  
W: [www.wcl.org.uk](http://www.wcl.org.uk)

"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Paul de Zylva, Director: Jodie Bettis

Vice Presidents: Peter Ainsworth MP, David Kidney MP and Baroness Miller of Chilthorne Domer

A company limited by guarantee in England & Wales  
Company No. 3889519 Registered Charity No. 1107460

We believe, however that, there are many more obvious priority areas across the country including water and wetland Natura 2000 sites, SSSIs and drinking water safeguard zones, that would greatly benefit from designation, or credible threat of designation, under the WPZ regulations.

In particular a great deal of effort and money continues to be invested in voluntary and incentive schemes to protect SSSIs, Natura 2000 sites and Drinking Water Protected Areas. In the first instance we suggest the Environment Agency focuses WPZ designation in areas where voluntary measures alone are unlikely, or have failed, to meet Water Framework Directive objectives.

Overall we remain supportive of the use of WPZs but feel that with the limited number currently being proposed, we feel that that this could be more effective in protecting the freshwater environment if piloted elsewhere.

On the Lower Lee, we would like to see widespread adoption of Sustainable Urban Drainage systems, which, at the moment, could be achieved by other (voluntary) measures (e.g. by integrating SUDS into all ongoing flood management projects and sustainable town planning and through new SUDS standards arising from the Floods and Water Management Bill).

Yours sincerely



Rob Cunningham  
Chair, Water Working Group

On behalf of the following six organisations:

- Amphibian and Reptile Conservation
- Association of Rivers Trusts
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- The Wildlife Trusts
- WWF – UK

The Blueprint for Water is a campaign of Wildlife and Countryside Link