Water for life and livelihoods:

Consultation on the draft update to the river basin management plans - summary response document

LIT 10344

We are the Environment Agency. We protect and improve the environment and make it a better place for people and wildlife.

We operate at the place where environmental change has its greatest impact on people's lives. We reduce the risks to people and properties from flooding; make sure there is enough water for people and wildlife; protect and improve air, land and water quality and apply the environmental standards within which industry can operate.

Acting to reduce climate change and helping people and wildlife adapt to its consequences are at the heart of all that we do.

We cannot do this alone. We work closely with a wide range of partners including government, business, local authorities, other agencies, civil society groups and the communities we serve.

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(https://www.gov.uk/government/collections/river-basin-management-plans-2015).

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Foreword

A healthy water environment – in rivers, lakes, estuaries, coasts and groundwater – benefits our health, wellbeing and economic prosperity, as well as benefitting the natural environment. River basin management planning is integral to delivering these benefits and maintaining and improving the water environment. Public consultations are one of the main ways that the Environment Agency seeks views on the framework for achieving good water quality.

The consultation on the draft river basin management plans was the third and final stage of public consultation in the second cycle of river basin planning.

The consultation ran for six months, from 10 October 2014 to 10 April 2015, with a separate document being available for each of the eight river basin districts.

The consultation proposed long-term objectives for the water environment and the worthwhile measures to achieve them. It asked for views about this and sought feedback on what stakeholders could help deliver. The consultation also provided an opportunity to comment on the supporting economic appraisal and environmental assessment.

As with previous consultations, the level of involvement and response from organisations and individuals is very encouraging. The views and opinions expressed are wide ranging and sometimes contradictory. All the feedback will help to update the river basin management plans and make decisions on how the water environment is managed, protected and improved.

This document summarises the range of comments made by partners. Over the coming months, we will provide further information on how they have helped shape the updated river basin management plans.

I'd like to thank everyone who has taken part in the consultation. We really value all the comments and feedback you have provided. By continuing to work together, the health of the water environment across the country will be protected and improved faster, and in the places that matter most to people and communities. I look forward to continuing to explore what we can achieve together in the future.

Anne Dacey

Deputy Director, Water Framework Directive

Environment Agency

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1. Introduction

In December 2009 the Environment Agency published the current river basin management plans. These plans are now being reviewed and updated, with partners, to cover the period 2015 to 2021.

The Environment Agency leads on eight of the plans in England; a further three plans are cross-border and we are working on these with Natural Resources Wales (Dee and Severn) and the Scottish Environmental Protection Agency (Solway Tweed).

The English and Welsh plans will be updated in December 2015, then submitted for approval by government and sign-off by the Secretary of State, and Welsh Ministers for the two cross border plans.

Understanding the benefits to people and communities from a healthy water environment is at the heart of river basin management planning. It also helps us target investment where it will bring most benefit.

In the first public consultation, 'Working Together', which ran until December 2012, we asked for views on how we can best work together to protect and improve the water environment. The summary, response and progress documents are on our website. These provide details of the responses we received, the actions we planned and progress with those actions. You can read a summary of 'Working Together' online: https://consult.environment-agency.gov.uk/portal/ho/wfd/working/together2012

The second consultation 'Challenges and choices' ran until December 2013 and gave communities and partners the opportunity to comment on what they thought were the most significant issues for the water environment and how they should be addressed. You can read a summary of the 'Challenges and choices' consultation online: https://consult.environment-agency.gov.uk/portal/ho/wfd/water/choices

This document now summarises the engagement process and the number and type of responses received during the consultation on the draft updated river basin management plans. A summary of feedback from national partners is presented, followed by a summary of feedback from partners within each river basin district. As a cross border plan, the feedback for the Severn River Basin District has been reviewed together with Natural Resources Wales.

In this consultation we asked for views on:

- Proposed changes to the river basin district, catchment and water body networks
- Proposed objectives for water bodies and protected areas
- Prioritisation of action
- Identification of measures
- The economic appraisal process
- What measures you can deliver
- The scenarios within the economic analysis
- The supporting environmental report (SEA

Feedback came from a wide range of partners, Annex 1 lists all of the organisations who participated and the table below shows the number of responses received in each river basin district.

River basin district	Number of responses
Anglian	103
Humber	55
Northumbria	26
North West	53
Severn	47
South East	33
South West	41
Thames	86
All RBDs	42
Total	486

The draft updated river basin management plans were published via the internet (https://consult.environment-agency.gov.uk/portal/ho/wfd/draft_plans/consult), and hard copies were available in the Environment Agency's main offices.

It was possible for individuals and organisations to respond to the consultation in a format that suited them, including online or email responses, verbally at meetings, or by written correspondence.

The Environment Agency launched the flood risk management plans (FRMPs) consultations at the same time as the draft updated river basin management plan consultation, recognising the need to align work. To improve efficiency and professionalism, the communications and engagement were further aligned by incorporating FRMP messages into communication materials and equipping Environment Agency staff with the knowledge to talk about both consultations at meetings with stakeholders.

In addition to the consultation on the draft updated river basin management plans, the Environment Agency welcomes the opportunity to increase engagement with new stakeholder groups and to work in partnership to generate insight and action on water management issues. The Save Our Waters campaign run by Blueprint for Water represented a unique opportunity for the Environment Agency to find out what matters to the people who use, value and enjoy their local water environment.

The Save our Waters campaign generated significant interest across a wide range of stakeholder groups, thanks to promotion through the Blueprint for Water consortium's network of members. The Save our Waters campaign was run in addition to the Environment Agency's formal consultation on updates to the river basin management plans in England.

The campaign differed from our formal consultation in that it asked a series of questions, within two surveys, that could be answered without referring to the draft river basin management plans. The Environment Agency received approximately 800 responses. Within the short survey, almost all respondents agreed that the health of the water bodies they had identified was important to them; just under 40% agreed that their water bodies were healthy and over 90% felt that something should be done to improve them. The responses received have been shared with catchment coordinators/hosts and will be used to help shape river basin management planning.

Objectives for this response document

The Environment Agency is now assessing the information received in the consultation, so that it can be taken into account when we update the river basin management plans.

On 30 October 2015, further information on how the consultation feedback has shaped the updated plans will be made available.

This document has the following objectives:

- To share an overview of the feedback received for each consultation question, at a national level and for each river basin district
- To present summary information on:
    - The number of responses submitted
    - The types of organisations that responded
- To summarise the consultation and engagement process
- To explain the next steps in river basin management planning

2. National feedback

The consultation on the draft river basin management plans received a total of 42 national level responses from a range of different organisations, groups, schools and individuals. All these responses have been thoroughly read, and this report summarises the main themes raised. River basin specific responses can be found in the following chapters. Some national responses included a high level of detail which has also been passed to the relevant teams to inform local river basin management planning. Below is a summary by each question of the main points raised.

Q1: "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

Many of you raised concerns about the apparent reduction in the number of artificial and heavily modified (A/HMWB) water body designations in the draft plans, compared to the original ones in 2009. Comments were also made about the appropriate application of designations and whether designation as A/HMWB is being used to lower standards. You also recognised that many artificial water bodies have been created primarily for the storage or conveyance of water.

You were concerned that proposed changes to water body boundaries and HMWB's may impact on small catchments and bathing water failures, and make the evidence on estuarine and coastal waters (formerly called transitional and coastal waters, TraC) more difficult to ascertain the Environment Agency's approach outlined in draft river basin management plans (dRBMP).

Several responses stated that objectives need to be set with the connectivity of the catchment network in mind and one response stated that there was 'poor representation of the water environment' which excluded too many waterbodies in their opinion. One organisation felt that the RBMP process is not monitoring or driving improvements in the health of smaller water bodies. You said "*We accept that many of the current monitoring methodologies and assessment tools are not appropriate for use on small water bodies but these often hold a disproportionate importance for UK wetland biodiversity and we would suggest that finding a way of monitoring and reporting on at least a representative sample, might help us prioritise how we safeguard and where necessary improve their health*"

There was concern raised over the changes to coastal streams and the perceived loss of protection this gives them. One response also objected to the 'removal' of small streams from WFD consideration for 'administrative reasons' because of the critical link to downstream hydrology.

One group felt that the current approach to the control of water abstraction in England and Wales falls short of what is needed to deliver the Water Framework Directive. It is perceived by some as a failure to transpose the Directive into domestic legislation and needs to be tackled as a matter of urgency, through the reform of the abstraction licensing system.

Q2: "Do you agree with the objectives proposed for water bodies and protected areas?"

You welcomed the approach of joining up directives but would like more information to help understand how conflicting requirements will be dealt with. You agreed that there should be objectives. However you had some concerns about the quality and robustness of evidence that is sometimes used to implicate certain sectors or activities, which may incorrectly (in your opinion) become a focus of attention where objectives are not being met. You stated that the five stage approach outlined in the consultation document should be applied robustly.

One responder stated that they had no objections to the process for determining the status of, and objectives for, water bodies and protected areas.

There were several comments stating that it was extremely difficult to find information on, or understand how the status of particular water bodies and protected areas had been established. You felt that this made it very difficult for bodies (which have to comply with RBMP requirements) to understand what they need to do to meet their legal obligations.

You said you would like to see more weight given to ecological goods and services in the objective setting process and have more information on that process, as it wasn't always clear how objectives have been set and what achieving them looks like. You also stated that objectives to 2027 and 6 year cycles are relatively short term when compared to other planning cycles (e.g. for infrastructure with 30-70 year cycles). You suggested that Government need to provide funding and/or incentives to secure improvements.

Some responders raised concerns over the alignment between water abstraction and its return, and feel the water industry aren't called to account in the same way as other industrial sectors, in terms of returning water to the same water body from where it was abstracted.

There were concerns over the perceived impacts that weir removal may have on potential hydropower development. One consultancy believes that the widespread impacts of barrier removal have not been appropriately assessed in the draft plans or that the specific impacts on the hydropower sector have not been fully taken into consideration.

You raised that the 'one out, all out principle' results in the status of a water body being determined by the worst scoring elements. You said that successful efforts are being made to improve catchments across the country and this approach means that these improvements are not always reported. You also highlighted that this approach may focus resources on those catchments which can easily report 'improvements' for WFD purposes, while delivering minimal benefit for people and the environment.

You thought that 'no deterioration' is a good idea, but have some concerns over how it is assessed. You asked for "*clarification on how the no deterioration principle is taken into account in RBMP's for objective setting and the subsequent determination of measures*."

Some responders commented that Part 2 of the consultation makes it clear that "*it will not be possible to complete all the measures needed to achieve water-dependent objectives for Natura 2000 protected areas, by the December 2015 deadline [set by the 2009 statutory plans*]". You said that you are "*highly concerned about this and the implications for other water bodies if the Agencies fail to meet deadlines for our most important protected areas*". You remarked that

meeting protected area objectives should be the priority, but were concerned that river basin management planning was too complex for some audiences to make an informed decision and that local data for local action would be beneficial.

One group said that they don't believe it is valid to 'assume' good status in the absence of real data. They also questioned the veracity of the classification process as often what is observed in the field seems very different to what is in the RBMP. Another group expressed concerns about improvements "being back-loaded into the 3rd plans".

Q3: "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

There appeared to be no clear agreement on a single approach for prioritising improvements to the numbers of water bodies reaching good status or improving the worst. Many respondents felt that this needed to be prioritised locally, on a case by case basis.

You thought that there should be a focus on achieving real improvements across large numbers of waterbodies (greatest benefits) rather than "box-ticking" water bodies already close to good ecological status for reporting.

One energy company thought that priority should be given to improving elements limiting benefit, regardless of status and that the "one out, all out" principle makes using the 'status' an inappropriate tool for targeting action.

Others thought that this process is too complex and water bodies should be evaluated on a case by case basis, prioritised locally, with one responder saying that they were concerned that improvements will be on too small a scale to make a real difference to the environment.

One group of students voted for a policy of improving as many water bodies as possible up to good quality, rather than concentrating on making the worst ones better. The pupils said that "water is the most valuable thing you own".

Q4: "Do you agree the correct measures have been identified?"

The theme from many of the responses was that a clearer link to specific measures would help to inform the answer to this question, and that the measures in the draft plans were "vague and lacking specifics". One group were particularly concerned about the over reliance on voluntary measures to address diffuse pollution from agriculture and wanted to see more implementation of existing regulation.

You thought that the plans should provide the link between local actions and national measures, focus on how the local actions build up to support the measures and recognise the contribution of those outside Government and the Environment Agency.

One organisation noted the significant complexity of the information presented within the plans and thus consultation challenges, and welcomed the efforts the Agency have made to engage groups with the consultation.

You welcomed scenario 4 which you believe highlights "*the potential for £8bn worth of benefits and 75% good status*" but are concerned that conversely scenario 5 "*lacks ambition, doesn't realise these benefits and will result in little overall improvement in status*". Affordability of the scenarios was raised in many responses to the economic analysis questions, with some respondents asking for clarity over how or if affordability will be taken into account and what the funding assumptions are based on. A few respondents were keen to highlight the importance of continued third sector funding, as a very cost effective way to secure future improvements.

You remarked that the level of local information relating to whether member ports/harbours might be required to undertake any measures had not been made clear.

One organisation said that more measures are needed on abstraction (and abstractions should only be licensed if they support good status); agricultural diffuse pollution (and stricter use of existing measures like WPZs) and water-dependant Natura 2000 protected areas. They also said that all the measures needed to achieve favourable conservation status should be implemented without delay.

One organisation noted that the "*WFD requires that the second cycle update of RBMP contains: an assessment of the progress made towards the achievement of the environmental objectives; a summary of and an explanation for any measures outlined in the 2009 plan not put in place and those in place not originally envisaged. Part 2 of the consultation (on the draft update) acknowledges this but the required information is not provided*".

You said that Countryside Stewardship and Catchment Sensitive Farming were important, but thought that existing measures would not sufficiently reduce diffuse pollution from rural areas and that a strategic plan of action was required. As part of this strategy you would like to see a review of the effectiveness of existing measures, especially from voluntary action and consider how compliance can be improved with existing regulation. You also suggested that there needs to be a clear timetable in place alongside all measures, so that stakeholders are aware of when a review of progress will take place and when action will be scaled up from voluntary to mandatory measures.

You also noted that whilst you welcome the inclusion of measures in Countryside Stewardship (that are designed to tackle soil loss and water pollution); you felt that these benefits would only be delivered if the measures were carefully targeted. You thought that measures that were both 'preventative' and 'prohibitive' were unlikely to be effective if contained in a voluntary code rather than regulatory framework. You stated that there is "*clearly an important role for voluntary initiatives but uptake will not be sufficient and is unlikely to be where the greatest need is*".

Some of you made reference to time-limited abstraction licences which will come up for renewal in the next few years. You raised that this will be an important opportunity to make significant progress in tackling abstraction that does not support water body objectives or risks deterioration without incurring compensation or 'disproportionate' costs. Some of you expressed that we should not renew time-limited licences if flow and abstraction flow pressures do not support good status of the associated water body. You also suggested that any new licences granted to currently exempt abstractions should restrict abstraction, so as to maintain a hydrological regime that supports good status. Concern was also raised about the methodology on 'no deterioration' in relation to the effect abstraction has on status.

Q5: "Do you agree with the way the economic appraisal process has been done?"

Some groups raised concerns over the economic appraisal process and felt that agricultural land had been disproportionately undervalued, compared to urban land. You also thought that wider benefits of measures should be considered and that the cost benefits assessment was too general, and masked the true costs to the agricultural sector.

One group stated that economic appraisal and impact assessments should take into account more sectors. It should also take account of the value of water level management and land drainage, including the contribution of artificial and heavily modified water bodies, to the economy and society.

One energy company said that they support the process of applying affordability tests and welcomed the opportunity to work with Defra on this. Another energy company said that they would welcome clarification of the potential costs and consequences to thermal power plant. They would also welcome further discussions with the Environment Agency on the detail of the economic appraisal process relating specifically to thermal power plants.

One group supported the use of ecosystems services but questioned how widely benefits have been identified. Another group thought that the economic appraisal was "*fundamentally flawed by*

the lack of information over the effectiveness of the proposed measures". You asked for further information on how disproportionate cost and affordability are decided; said that economic costs and benefits to hydropower should be part of the economic appraisal and that Shellfishery benefits as a food were undervalued.

You noted that the economic appraisal process recognises the increase in physical modifications driven by climate change and population growth but only identifies the resulting need for flood protection, land drainage and water impoundments. You thought that it should recognise the delivery of renewable energy and managed realignment to address coastal squeeze.

You agreed that the economic analysis informed whether objectives were worthwhile but suggested some improvements that could be considered for the final plans. These included consideration of the cumulative impact of measures on food production; the ability of farmers to pass on costs to the market for higher environmental standards and review of the 'cost to benefit' algorithm used to achieve worthwhile objectives in relation to agriculture.

Q6: "What measures can you deliver to help achieve the long term objectives?

In many cases, national consultation responses did not focus on specific measures that they could deliver but made offers of engagement, advice and appraisal, as well as highlighting the ongoing work that some national bodies are doing. For example, we had offers of professional advice and appraisal from an institute, a consultancy offering to carry out further development on sustainable hydropower schemes and the suggestion that industry led initiatives need sufficient recognition from Government, so that they can contribute to river basin management plans in order to make these approaches work.

You raised that IDBs are engaged in widespread initiatives to make operations and maintenance, including vegetation management, more environmentally friendly.

You also raised that tidal lagoons can deliver a wide range of economic, social and environmental benefits i.e. coastal protection, water quality improvements, habitat creation and other ecological enhancement such as artificial reef structures.

A group of abstractors suggested that they are keen to engage in ongoing dialogue on Abstraction Reform.

Q7: "Do you have any further comments on this consultation?"

A large amount of detailed information was submitted in the response to this question. A common theme was that you find the principle of consultations, and the river basin management plans, to be a positive one. However, you also commented that the information in the plans is very complex and can be hard to engage with. You thought that more could be done to support engagement, both locally and by making more detailed information more easily available and by having more effective sign posting between documents. These issues made it difficult to provide an informed response to the consultation for some people.

You generally supported the principle of objective setting but were concerned that the information and communication is too complex for a business audience and the general public. You suggested that smarter communication and data sharing tools may improve awareness, understanding and practice change. One group believes that delivery of WFD can be helped by stakeholders if simple, more accessible information was made available, with the final RBMP's setting out who is responsible for delivering the actions and, in addition, providing a clear link between local actions and the RBMP objectives. You suggested that this would avoid duplication of effort, simplify bureaucracy and ensure effective use of resources.

One organisation stated that the plans offer the opportunity to provide a holistic mechanism for management of all aspects of the water environment across catchments, and help achieve benefits beyond the minimum legal requirements of the WFD.

You commented that you would like to see a more joined up approach with other plans and strategies. You stated that flood and coastal risk management and water quality must be brought more closely together, integrating river basin management plans (RBMPs), flood risk management plans (FRMPs) and shoreline management plans (SMPs).You said that both RBMPs and FRMPs are difficult to follow. You said that this has been a particular problem with RBMPs and "*has been acknowledged by the Environment Agency, which does a lot of work 'behind the scenes' to integrate the objectives of RBMPs into other plans, particularly FRMPs*".

The Catchment Based Approach and its application in the river basin management plans was generally welcomed, and you mentioned that in many cases you have "excellent and productive" relationships with the Environment Agency.

You raised that the impact of invasive non-native species (both flora and fauna) is a significant issue and one that is likely to increase in importance over the period to 2027. One group considers that greater emphasis needs to be placed on this area which is likely to lead to significant problems for water bodies of all types, particularly in light of climate change.

You also said that the Environment Agency needs to recognise the benefits of improvements made within classification classes and the limitations that remain. You recognise that measures to address diffuse pollution are only at high level; however you would like to understand how detailed measures will relate to improvements. You stated that agriculture is not the only cause of rural diffuse pollution and other areas of land management need to be better assessed.

One group suggested that there needs to be a way of taking account of priority freshwater-dependent invertebrates and biodiversity in the plans, as well as actions to further their conservation in specific locations, especially where this might not be covered by good ecological status

You said that there was a need for stronger commitment to address nitrates in groundwaters; more detail required on transitional and coastal waters and that the effects of measures upon the historic environment should be considered.

You raised concerns around the use of exemptions specifically related to abstraction pressures. You stated that action on abstraction in a number of cases has been justified as being delayed on the grounds of 'practical constraints of a technical nature'. One organisation also had some concerns that decisions to implement improvements should be based on sound science. Concern was also raised that regulators recognise the need for the water industry measures to fit in with their clearly defined planning cycles.

You suggested that improvements that have the greatest societal benefits should be prioritised (accepting that these decisions may vary from basin to basin depending on that communities view as to what is 'valuable' to them).

Concerns were also raised about the protection for Shellfish waters particularly WFD targets and critical guidance standards on faecal coliforms. A number of responders agreed with the 'polluter pays' principle but do not feel it is being fairly addressed by all sectors, when it comes to polluting Shellfish waters. You also suggested that boundaries for Shellfish protected areas could be reviewed to the benefit of prioritising future water quality investments.

Whilst biological monitoring has improved, you felt that there is still uncertainty on whether changes in status are due to real changes or changes in monitoring. You suggested that extra clarity could come from the use of third party datasets. You told us you would like to see clear links from failing classification to 'reasons for not achieving good status' and the measures put in place to address them. You said that it was difficult to compare the data from pre- and post-consultation due to methods changes and the move from old to new building blocks.

For the next cycle you would like to see a clearer document with a greater focus on the reasons for not achieving good status within a water body, to make identifying measures (and deliverers) much clearer.

Consulting at a national level

A wide range of communications and engagement activity was carried out at a national level to support the RBMP consultations. This section provides some examples of these activities.

Workshops

A number of workshops were held before and during the consultation period, with organisations from a range of sectors, to discuss the consultations.

Examples of workshops held:

- Bathing waters workshop, September 2014
- Modified waters workshop, October 2014
- Freshwater and wetlands workshop, led by Natural England, November 2014
- Water Industry sector workshop (covering flood risk management plans as well), January 2015
- Rural land management sector workshop (also covering flood risk management plans), January 2015
- Water resources and hydromorphology workshop, March 2015
- Adaptive Management of flow and morphology measures workshop, March 2015

Meetings, seminars and conferences

The consultation was on the agenda at a number of national meetings and events. For example:

- Waterwise Annual Conference, September 2014
- Cleaner Seas Forum, November 2014;
- England Fisheries Group meeting, November 2014
- Society of British Water and Wastewater Industries conference, November 2014
- Catchment Based Approach national support group, December 2014
- International Navigation Association seminar, January 2015
- Shellfish waters task and finish group in February 2015
- Strategic Water Quality and Waste Planning Group, March 2015
- Blueprint for water group, April 2015.

National Liaison Panel for England

The national liaison panel for England met on 18 November 2014 and 2 February 2015. Both meetings were held as workshops, and the February workshop also included some representatives from the river basin district liaison panels. An estuaries and coasts sub group workshop was held on 28 November 2014.

Social media and direct emailing

The consultation was promoted through social media with a series of tweets at the launch, mid and end of the consultation period. An email was also sent out at the launch, during the middle and at the end of consultation to over 800 stakeholders to encourage them to respond to the consultations.

Newsletters and websites

The consultations were mentioned in various newsletters including Defra's Fishing Focus, the Catchment Based Approach newsletter, Coastal futures, the National Flood forum, the Local Government Association newsletter, the British Marine Federation, and on the Save our waters campaign website.

Statutory public notices were placed in the London Gazette and in papers within each river basin district to advertise the launch of the consultation.

3. River Basin District feedback

This section provides information for each river basin district. It summarises the key themes arising for each consultation question; the engagement carried out and the numbers of responses received.

3.1. Anglian River Basin District

Summary of consultation feedback

The Anglian River Basin District encompasses three Environment Agency Areas, namely Lincolnshire & Northamptonshire, Cambridgeshire, Bedfordshire and Essex and Norfolk &Suffolk. The river basin district received the highest level of response compared to other river basin districts and there was a wide spread of sectors and individuals answering the questions or providing information on local issues.

The main respondents were from Environment Management bodies, Local Government and nearly 30% of the responses coming from individuals. There were a number of common responses associated with structures on the River Ivel, which have been sent to the local teams for consideration. Responses varied from single issues to widespread discussion around the plan with some respondents answering all the questions and others concentrating on the question of most interest to them. In general, there was support for the changes to catchments and the objectives proposed (with exception) but widespread criticism of the nature of the consultation, its complexity and largely impenetrable data sets which made answering the questions very difficult.

The following pages summarise the general themes emerging from an analysis of all the responses and highlights areas the Environment Agency needs to take into consideration moving forward in planning for the future of the water environment. A wordle summarising the key words coming out of the consultation:

Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

There was general support coming from the consultees on this question, indicating a good balance between environmental requirements from the legislation married with economic and social sustainability strands. However a number of respondents claimed that the Environment Agency had not consulted enough on these changes and that they were being presented with the information, rather than being able to influence it.

A number of respondents indicated that the removal of small tidal water bodies undermines their value and that they are likely to be ignored in the future. The water bodies are highly valued locally and have rich habitats and amenity value. They ask how are the Environment Agency are going to ensure this neglect does not happen? Respondents also need to be confident that appropriate reporting systems are in place to monitor the physical and ecological status of these water bodies. A number of respondents would not wish to see the extent of these areas increased in future WFD cycles.

Comments relating to question 1 imply that the impact of boundary changes and the provision of evidence for the changes is insufficient. There were also some local challenges around boundary changes and in finding it difficult to discover exactly which boundaries had changed and the reasons for these changes.

There have been numerous individual and collective challenges that the River Ivel is not heavily modified. It appears that there has been some information released in the local community around the Environment Agency's intentions for removing a structure (according to internal sources this is not true). This information has been shared with local staff.

There have been comments that the removal of certain cycle 1 water bodies and their re-assignment as coastal or estuarine water bodies (affecting the majority of the Suffolk estuaries, North Norfolk coast, lower Great Ouse and lower Welland/Witham within the Eastern IFCA district) seems logical.

Many respondents noted that the removal of weirs and locks will create more diverse habitat and may help manage flooding. However, it is claimed there will be a significant adverse impact upon

other water courses that are reliant upon the current water levels maintained in the rivers; many of these water courses will cease to exist after the removal of weirs. Respondents are concerned that this would result in the loss of many rich and diverse flora and fauna habitats. One reason for the proposed changes is to ease passage of elvers travelling upstream. Many respondents claim that eels have been finding their way through the obstructions for hundreds of years and do not support weir and other structure removal.

While respondents acknowledge 43% of the water bodies in England are considered to be “artificial” or “heavily modified” (A/HMWB), they claim the methodology for designating them is not transparent. Respondents say the consultation document identifies a range of reasons why water bodies can be A/HMWBs, but the process for selecting them should be more transparent and consultative so that all parties can be confident that decisions are based on best local knowledge. A number of respondents would like to be assured that there is a process for removing the HMWB designation if successful river restoration measures are completed in the medium term.

General consensus that removal of structures is risky and potentially damaging to the overall environment. There were also widespread calls that phosphate removal should be the priority as it causes so many failures. Respondents say the Environment Agency should be concentrating on improving water quality and not on removing or modifying in-river structures.

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

There was general agreement that the objectives are right. Exceptions are that some objectives seem to have been set without all available information and too much reliance on Environment Agency internal knowledge. A number of respondents claim that more localised consultation would have changed some of objectives based on on-the-ground knowledge.

The water industry sector states that more action should be taken by other sectors as their own investments may not result in overall improvements (status change) without everyone else doing their bit. They also challenge whether the Environment Agency’s current system of monitoring and enforcement is adequate to encourage others to play their part. The sector also states that the pathway to achieve “good” for water bodies does not necessarily require certainty of reasons for not achieving good status. So the reasoning and evidence that links an environmental problem to an element status (and therefore the overall water body status and reaching good) is somewhat unsound.

The water industry sector response also suggests it is inappropriate to use recent abstractions from groundwater as a baseline for “no deterioration” to groundwater bodies, as this baseline period is not representative of historic conditions across all abstractions.

Responses from academic sources indicate that the text of the objectives does not address the full means for integrating ecosystem services into catchment based planning. Also that the plan does not address the many institutional and structural impediments that prohibit comprehensive catchment- based planning.

An environmental NGO put forward an argument to align Biodiversity 2020 objectives closer to Water Framework Directive outcomes so that the two programmes would benefit from common goals.

Many respondents challenged the seemingly large programme of potential structure (weirs etc) removal, while it was thought that the Environment Agency should be concentrating more on improving water quality, even acknowledging the high cost of phosphate removal.

The agriculture sector called for more analysis on the contribution of existing mechanisms to tackle rural impacts before making any decisions or committing to further potentially expensive measures.

A number of respondents state that it was difficult to answer this question because of a lack of clarity in the way the objectives are presented and the confusing level of detail and location of information.

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

There is concern expressed that the “one out all out” rule will result in investors and customers being let down where their interventions, while improving aspects of the water environment, will not actually result in a change in status – it could put them off investing further in the future.

Whilst in terms of meeting EU WFD targets, there is probably greater merit in ensuring the maximum number of water bodies are at a good status, there should realistically be a wider cost benefit analysis that takes into account the social and economic implications of particular improvements, recognising the integrated nature of the role of catchments.

Many respondents (either implied or explicitly) indicated that a benefits led approach would be the most appropriate priority and there was widespread support for investment where the outcomes would have other benefits (to society/flood risk/amenity) than WFD status alone. Another theme was that respondents would like to be part of the prioritisation process and for it not just to be left to the Environment Agency to decide (this being especially important where there is keen local interest in a particular intervention).

Some respondents however would like to see the poorest watercourses invested in first as their status means they get further environmental abuse in terms of pollution and fly tipping. There is a feeling that poor watercourses will always remain in the state they are at because the longer they are ignored the more expensive will be the route of remediation.

Many indicated that local knowledge is needed for targeting limited resources and that this was the wrong question.

Many respondents said that more publicity should be given to measures that will lead to an overall improvement in the water body (for instance multiple elemental improvements) even though it may not change its overall classification.

Focus should be on those issues which are most important e.g. protected areas or those which are highly valued locally and those solutions which are realistic and affordable. If this means improving a “poor” or bad watercourse towards “moderate” this should be seen as positive if it is cost beneficial and achievable. WFD status improvements should be an achievable goal and the result of least cost for greatest gains, whether this is “poor” to “moderate” or “moderate“to “good”.

A couple of respondents pointed out that improving the physio-chemical aspects of a section of river will almost certainly provide benefits downstream and that we should consider this “ripple” effect in our decision making process around prioritisation.

Overall, there was no consensus as to how we should prioritise investment, but there were strong views across the spectrum of possible responses.

Q4 "Do you agree the correct measures have been identified?"

Many respondents expressed concern that there was insufficient detail to answer this question. In addition, that it was difficult to understand local implications from the higher level descriptions in the plan. Respondents wanted to see an explanation of the issues and measures that applied to them at a local level and did not welcome or understand the higher level information contained within the consultation documents.

The water industry sector indicates that greater credence should be given to the carbon and water footprints of the measures and that this should be reflected in the plan. Only by taking into account these issues can we robustly assess the impact of interventions. They also said that Drinking Water Protected Areas are not given sufficient priority within the plan.

Many respondents indicated that phosphate levels should be reduced at source. Although expensive, this seems to be a major issue where many water bodies are failing. Some are of the

view that this may never happen due to the costs and want to see the problem tackled by reducing the amount of phosphate entering waste water treatment works.

All measures need funding; otherwise it is unlikely they will ever be implemented. Respondents commented that the plan puts too much reliance on actions and interventions from the voluntary sectors and it is feared these may never happen without the correct level of financial support from a central pot.

Some respondents challenged the assumption that point source pollution is now understood. Permitted point source discharges are not continuously monitored, but assessed through a defined sampling regime which may mask the variability in these discharges. Some respondents feels that there is a very real risk that peak concentrations missed in routine monitoring of point source discharges are being misidentified as diffuse pollution.

Respondents from the agricultural community challenge that all rural diffuse pollution is from farming activities (as implied in the plan). It was noted that there was no reference made to pollution arising from road run-off and septic tank drainage. Where is the reference to road run-off and septic tanks drainage?

General comments were made that the plan does not sufficiently describe how the measures will be adapted or updated to reflect the pressures of population growth and climate change.

One response claimed that what is missing is the information on those measures that have been deemed to be non cost effective in the economic process – this information would have been helpful in understanding what potential measures are not going to be applied and whether information exists to revise either the cost or benefits excluding them from the plan. Also Part 1 only lists new measures against each issue rather than all of the measures plus new measures (which would be more helpful). The new measures are aggregated into bundles, and a generic listing of the measures within these bundles would have been very useful to better interpret this information. The bundle titles/descriptors are not clear.

Some respondents commented that the Environment Agency should exercise its enforcement powers more vigorously and more widely alongside any proposed measures to ensure the best outcome for the environment at the least cost.

Q5 "Do you agree with the way the economic appraisal process has been done?"

Some respondents asked if the Environment Agency could have gone further in assessing the health benefits of an improved environment? In addition, some felt that ecosystems services benefits are currently underplayed and that some worthwhile schemes may have been overlooked because of this. There was widespread concern that the plan does not indicate which measures have been dropped as non cost beneficial in the economic appraisal and question whether this will be revised in the future.

There was also concern expressed in relation to scenario 5 of the economic analysis, where it felt too much emphasis is being placed on the catchment partnerships delivering improvement with little funding available.

The water industry sector challenges the implied premise that all benefits are assumed to be linear, whereas with something like phosphate the benefits are only realised when everything is in place or limiting factors reach a certain point. This reflects an earlier point where there is concern the water industry interventions may not produce elemental or status changes unless there is interventions by all other sectors affecting that watercourse.

Some respondents commented that they did not really understand the approach the Environment Agency had taken and that as a consequence they lacked confidence in it. Also many individual and smaller sector respondents said that the economics work was totally unfathomable, whereas larger sectors indicated they had to put a lot of effort into revealing some of the underlying detail.

There are claims the agency have not looked sufficiently at benefits such as health and wellbeing and tourism and in doing so could have excluded some valuable interventions.

A few respondents indicated that the catchment data explorer is difficult to use and does not provide much information. Some said that despite local Environment Agency staff having briefed them on the process they still did not feel qualified to respond to the question. Respondents think that there has been a misplaced assumed level of understanding within the consultation process.

The agricultural sectors said the economic analysis does not take into account the factors that affect agriculture's ability, at farm level, to cover the costs that would be required to meet WFD objectives, especially when balanced against having to produce more food as global demand increases. They cite a difference between industry level challenges and those to agriculture, where pressure impacts hit at the individual farm level and there is little flexibility in terms of time and money to deal with it. They also consider NWEBS to be flawed and the plan has potentially over-estimated benefits.

One respondent challenged that Scenario 1 does actually have (great) cost in terms of infraction proceedings and any subsequent fines to the UK if this option was taken.

Q6 "What measures can you deliver to help achieve the long term objectives?

Outside of known funding and interventions (such as the water companies environment programme) some respondents suggested ways in which they could contribute to long term objectives. Some of the general themes that respondents gave to this question are summarised below (this is not meant to be an exhaustive list of all suggestions made). A number of individual and smaller sector respondents did however suggest it was hard to see how they could contribute in a meaningful way with lack of resources and expertise.

Sector	Measures proposed	Location
eNGOs / Partnerships	Development of CaBA approach	Across the RBD
	Localised action in invasive species	Various
	Community engagement funded by CPAF	Various
	Create riparian buffer strips, restore river banks, increase habitat connectivity, install/improve fish passage, monitor/ eradicate INNS & education/engagement work (using volunteers where possible	Across the RBD
	Wildlife Trusts have a wide network of contacts and local knowledge that could help develop schemes better and with more benefit. They also see the catchment based approach and the work of the catchment hosts and partners of the Environment Agency as very important as it meets a number of their wider aspirations for Living Landscapes, Living Seas and their work with in	

	wildlife conservation and supporting people. A woodland organisation pointed out the benefits of introducing and enhancing woodland along river margins. The greater use of trees can reduce water volumes and improve shading to reduce thermal stress on freshwater life. Enthuse local communities, groups and businesses and involve them in the decision-making and activities to help them improve, enjoy and understand the rivers and wider environment.	
Water Industry	As would be expected, major sectors alluded to their core work areas relating to Water Framework Directive outcomes, such as the Water Companies regular price review and associated environment programme. 1 fulfil National Environment Programme during the period April 2015 to March 2020. 2 include work to prevent eel entrainment in abstraction intakes and to improve eel passage over our in-river structures. 3 continue with water efficiency programme and our catchment management programme Working with key stakeholders to reduce diffuse pollution. 4 continue to sit on the steering groups for the Broads, East Suffolk and Combined Essex Catchment Partnership. Intend to continue to support these Catchment Partnerships.	Across the RBD Essex and Suffolk
Individuals	Report pollution incidents Many feel that sharing information, evidence and ideas would be a positive way to improve the quality of interventions as well as enthusing local communities, groups and businesses and help them improve, enjoy and understand the rivers and wider environment. Some groups said they could offer	Across the RBD

	assistance with Landowner contact and liaison for Agency Projects, acting as an introductory and ongoing relationship management. Respondents from smaller sectors indicated that it was difficult to see how they could affect any change with their current resources, but are willing to enter into dialogue with the Environment Agency. Many felt the need for great collaboration between government sectors and the public wanting to make a difference on the ground. Volunteer assistance with tree planting, removal of non-native species and minor landscaping – but would need Environment Agency supervision/co-ordination.	Bedfordshire
Various	Use water efficiently	Across the RBD
Agriculture/Land Management Sectors	Again, it was pointed out that farming already has many conflicting priorities in terms of the environment and food production and that financial impacts of the Water Framework Directive will hit at farm, not sector, level. Help organise Farm Business Updates which is a collaboration between the Environment Agency, National Farmers Union, CLA, Catchment Sensitive Farming, Campaign for the Farmed Environment, the local water company, and the Farm Advice Service.	Various
Angling	Anglers have a great deal of bank side knowledge and can be the eyes and ears for others as to what is happening on the rivers at times when others may not be there. Angling clubs can also improve fisheries data by entering catch returns.	
General	General comments that sectors and groups could do a lot more if they had more available funding (main obstacle to delivery).	

IDB	IDBs have maintenance programmes in which they balance maintenance activities and conservation works through agreed BAPS etc.	Norfolk
Borough Council/Local Authorities	Physical modifications to mimic more natural water body conditions to improve water quality, co-systems or assist in flood management through development proposals, or supporting enhancement works funded by development, or alternative funding sources and works to its riparian responsibilities.	Suffolk
	Encouraging SUDs and natural flood management.	
	Reduce the impact of Highway activities on water bodies.	
	Work with Catchment Partnerships	
	Managing pollution from waste water/towns, cities and transport by using appropriate conditions/solutions	
	in association with development proposals, e.g. increasing capacity in foulwater sewers/providing	
	Pollution traps and preventing environmental hazards through monitoring of potential polluters.	
	A process of sharing information/intelligence in respect to these may be advantageous.	
	Changes to natural flow and water levels – creating additional flow where appropriate where	
	Development has diverted feed sources that have resulted in productive water flows being diminished.	
Recreation	Provide eyes and ears along the river banks	
	Report pollution, non-native species etc.	
	Small-scale litter-picking through the Rivercare scheme	

Increase awareness of the dangers of non-native species e.g. the 'Check, Clean Dry' campaign.

Work with EA in designing combined fish-passes and canoe-shoots (such as on the Medway) and other river structures, such as canoe portage platforms, to promote responsible recreation.

Q7 "Do you have any further comments on this consultation?"

Some respondents suggest that the Environment Agency have not defined Scenario 5 well enough, particularly around costs, so that it is not possible to compare effectively with the other scenarios.

The agricultural sectors comment that main issue with the RBMP is that access to the underlying data is unfathomable. While this level may be suitable for large organisations such as water companies to be involved, in agriculture a completely different level of detail is required. For the RBMP process to engage individuals, as is required with the agricultural sector, new approaches towards engagement are needed.

Local Government feels that it has not been consulted with effectively and the plans would be improved if this had been the case, this being a common theme from individuals and other sectors alike.

Catchment Partnerships say they can only be as effective as the funding that they have available to them. With significant investment there was both huge delivery and good levels of match funding from the non government sectors. With too little support the host bodies struggles to exist, never mind deliver. This is seen as a big risk as the plans put huge stock in the role of the catchment partnerships and other voluntary organisations.

Many respondents said that the “one out all out rule” is difficult for the public to understand and paints a gloomy picture as investments and improvements in elements does not change status. Respondents feel a lot of effort could be “wasted” if we do not see both status improvements and tangible visual improvements on the ground. Also the plan is regularly described as lacking ambition both in terms of timescales and water body status objectives.

One major theme coming out of the responses for question 7 was a widespread cross sector condemnation of the consultation documents. They were often described as “not fit for purpose” and the whole consultation approach was found far too complicated for many respondents. There was cross-sector criticism of the Environment Agency’s approach and many respondents said that this will have prevented many people from responding. Even major sectors within the water and agriculture sectors say it is impossible to find the underlying detail.

Individuals comment that there should have been a simplified consultation for members of the public and whereas the plan and associated documents try to be something for everyone, they are unfathomable to most.

A number of respondents said or implied that river basin planning should be linked to local plans and water supply so that new development always has a sustainable water supply.

There was widespread concern over the clarity of the consultation, the reliance of links to supporting resources and the technical content. Many regarded the various links and documents as extremely difficult to follow.

Consulting in the Anglian River Basin District

The Anglian River Basin District comprises of three Environment Agency operational Areas and each adopted a slightly different approach to the consultation process. All of the Areas used direct emailing and tweets to reach the maximum number of people and some chose to go further in setting up meetings around the District to introduce people to the process. Checkpoint events were also held both internally and externally to ensure the largest number of Environment Agency staff were able to interact with others on the consultation. Overall, we made external briefing packs available on the website, and promoted the consultation locally through:

- 88 MP Briefings emailed
- Emails to Trust, Groups, Partnerships and 30 Local Authorities
- 54 tweets reaching 12000 followers
- 9 Checkpoint events for 160 participants
- 20 workshops for key stakeholders (NE, Wildlife Trusts Angling Trusts etc)
- Sector Briefings developed for Panel members shared with their networks
- On site events attracting 150 people

Staff involved in meetings with stakeholder groups and partners shared information on the draft RBMP at their meetings and workshops during the consultation period.

The table below provides details of the high level engagement activities carried out.

Date	Type of event	Stakeholders involved
13/02/15	River Basin Liaison Panel	Panel Members and catchment partnership leads
20/04/15	River Basin Liaison Panel telecom (environment programme)	Panel members and environment programme managers /Area Manager

Feedback received came from the following groups:

Sector	Number of responses
Individual	30
Academia	2
Business/commerce	1
Environment management (including NGOs)	21
Farming/land management	4
Government, local	18
Government, national	2
Leisure/tourism	4
Transport/navigation	1
Utilities	3

Other	15
Not entered	2
Total	103

3.2. Humber River Basin District

Summary of consultation feedback

The Humber River Basin District (RBD) covers a substantial geographical area covering Yorkshire, north Lincolnshire and the Humber Estuary and all the catchments in the east and West Midlands feeding the River Trent.

55 replies were received to the consultation spread across this geography. The largest sector responding was the environment management sector reflecting the large contribution by this sector.

A significant number of responses were received from people and organisations to say they found it hard to access the consultation documents and navigate to the information relevant to them. Consequently whilst most agreed with the generic principles of the proposed measures and objectives they found the detail hard to access or too complex.

The diagram below illustrates some of the key themes that were raised in the responses:

The following pages summarise the general themes emerging from an analysis of all the responses and highlights areas the Environment Agency need to take into consideration in planning for the future of the water environment.

Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

Within the Humber River Basin District (RBD), there was little comment about the proposed changes to inland water bodies or heavily modified water body designations (HMWB) and those that did comment were broadly supportive.

One local authority did comment that the catchment boundaries should match boundaries published in the draft flood risk management plans and their own local flood risk management strategy, re-iterating the point that there should be closer integration of the river basin management plans and the flood risk management plans.

We did have one or two responses from organisations about specific water body changes, who wanted to be reassured that water bodies had not been merged in order to "hide" failures in smaller water bodies.

One catchment partnership had concerns about the HMWB designations and the associated methods of classification. They commented that urban areas are invariably classed as heavily modified water bodies which can only reach good ecological potential, resulting in biological parameters not being fully taken into account in the classification.

Obviously the Humber RBD has fewer coastal and estuarine areas than other RBD's such as Northumbria or Anglian, but those organisations with a coastal interest that did comment said they did not support the deletion of water bodies in small coastal catchments. Reasons given for these views included:

- It removes the official recognition and perceived support for action and undermines funding opportunities.
- No information was given about how actions would be taken for these non-reportable water bodies.
- It fails to recognise the candidate and current Special Protected Areas and candidate Marine Conservation Zones.
- It ignores the contribution of small coastal streams to bathing water quality.

Local authorities and partnerships on the Humber Estuary commented that the estuary should be classed as a management catchment because its environmental status and economic drivers are of regional and national importance. They felt that there should be consistency with other major estuaries around the country.

Many responses indicated that the Environment Agency did not clearly explain what boundary or designation changes were proposed, nor justify the reason. People also felt that the information needed to answer this question was not easily accessible. *"This information hasn't been easy to find for our management catchment from the consultation documents."*

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

Many people commented that the documents did not clearly explain what the objectives were. Those that established that it referred to each and every water body often said they did not have the resources or time to comment on this level of detail particularly since this level of information was not available from the consultation documents.

There were a number of comments about the Catchment Data Explorer. Some seemed to be satisfied with this data tool but a significant number found it difficult to navigate.

Some organisations found it difficult to comment on objectives on a water body scale when the plan documents did not propose objectives for 2021 or specify how they would be achieved.

With regard to the protected area objectives there was support for the link with Natural England's Site Improvement Plans (SIP) programme although concerns were expressed that the links between water body objectives and favourable status of Special Protected Areas (SPA), Special Area of Conservation (SAC) and Sites of Special Scientific Interest (SSSI) were not well established.

There was very little mention of the other protected areas though several respondents were disappointed that protected species were not considered e.g. the Esk Pearl Mussel population.

Again, a coastal theme emerged with this question with respondents reflecting their concerns that the coastal and estuarine water bodies are not monitored and included in our work and documents to the same extent as inland waters and demonstrated a lack of integration.

There was, however, support for setting objectives of a strategic nature and making full use of the alternative objectives available with the legislation as a means of meeting this challenging directive.

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

Most respondents felt this was not a black and white question and as you would expect from a subjective question there was a range of replies, from those who thought we should tackle the worst first to those that advocated reaching Good Ecological Status (GES)/ Potential everywhere.

The majority, however, felt that the Environment Agency should base priorities on actions that produce multiple and maximum benefits and that these decisions should be made locally.

There was general recognition that getting all water bodies to GES was not realistic and that pursuing activity solely for the purposes of meeting the directive was not sensible.

Q 4 "Do you agree the correct measures have been identified?"

The issue here was one of reporting generic measures at a high level with little mention of how they will be applied, against a desire to see specific measures for specific locations. A common view expressed was that in order to understand whether measures were correct they needed to understand what actions were actually planned to take place.

There was some concern that the generic nature of the measures may not provide the legislative backing to ensure that other organisations have due regard to the plan.

Again, there were plenty of comments that people did not have the resources to verify the information that the Environment Agency have collected and challenged that they had not been sufficiently involved in this process to comment. Views were expressed that the Environment Agency has relied heavily on internal expert knowledge and data and not considered other information sources.

Strategically, there was comment that measures in this plan should be integrated with other plans such as flood risk management plans, marine plans and local authority plans.

There was concern that the balance of measures proposed and suggested by scenario 5 in the Economic Analysis did not match the allocation by sector from the reasons for not achieving good status (RNAGS) data and this challenges the polluter pays principle. This challenge was largely levelled at the agriculture and urban sectors although in their defence there were comments that these sectors do not have the funding mechanisms to pay for the failures assigned to them. There were also a significant number of responses questioning the effectiveness of relying on voluntary measures.

People commented that there were instances in the catchment summaries where we have described pressures and issues and yet have not identified measures to address them, particularly in upland or urban situations.

There was also comment that the success of measures from the previous plan had not been assessed making difficult to know whether the proposed measures were sufficient to meet the objectives proposed.

Several respondents from the environment management sector felt that there was an omission or lack of ambition to tackle invasive non-native species and also integrate forestry into the catchment solutions.

Q5 "Do you agree with the way the economic appraisal process has been done?"

The overwhelming point made was that this was a complex area of work, to which an awful lot of effort had been applied. However a large proportion of people responding felt they did not have the information, resources or skills to comment.

There was general support for the principle of using a cost benefit approach to making the economic case for action and endeavouring to complete the work although many respondents felt that it should only be used as a guide based on the uncertainties and assumptions required. Specific comments related to the exclusion of carbon costs, impacts on agricultural sector costs and specifics on the methodology such as inconsistent discounting periods.

Q6 "What measures can you deliver to help achieve the long term objectives?

Outside of known funding and interventions (such as the water companies' investment programmes) some respondents suggested ways in which they could contribute to improving the water environment. Some of the general themes that respondents gave to this question are summarised below (this is not meant to be an exhaustive list of all suggestions made). A number of individual and smaller sector respondents did however suggest it was hard to see how they could contribute in a meaningful way with lack of resources and expertise.

Sector	Measures proposed	Location
Environment Management	Development of the Catchment Based Approach.	Across the RBD
	Develop and deliver partnership projects which tackle the relevant issues.	Across the RBD
	Involve and engage local communities	
	Create riparian buffer strips, restore river banks, increase habitat connectivity, install/improve fish passage, monitor/ eradicate invasive non-native species and	Across the RBD

	education/engagement work.	
	Large scale peat restoration work	Upland catchments
	Creation of new wetlands in partnership with mineral operators and flood risk management authorities.	Across the RBD
	Work with the Local Nature Partnership	Humber Estuary
	Developing external funding bids to secure fish pass projects	Don Catchment , Esk Catchments
Water Industry	Investment to deliver improvements in assets via the National Environment Programme.	Across the RBD
	Continued investment to improve the understanding of the impact of our assets on the water environment.	
Farming/land management	Targeting the Campaign for the Farmed Environment.	Across the RBD
	Planning of industry activity	
	Providing evidence of activity	
Transport/navigation	Continued work to ensure necessary mitigation is in place	
Local Government	Sharing modelling expertise to improve flood risk management and water quality work streams	Hull and East Riding catchments,
	Work to improve integration between flood risk management plans, shoreline management plans and river basin management plans.	Derwent and Esk Catchments
	Incorporate actions into our local plans	Tame , Anker, Mease
Academia	Develop partnerships to share expertise on diffuse pollution in urban areas and from metal mines	

Q7 "Do you have any further comments on this consultation?"

There was plenty of comment about the consultation material, data presentation and its accessibility. There were strong messages that the documents were too lengthy and did not convey the information to answer the consultation questions. To be able to comment meaningfully

people had to access significant volumes of information which often overwhelmed them or required interpretation by Catchment Co-ordinators.

There is a large community of interested parties and co-delivers involved in river basin planning who work in partnership with others and access funding from a variety of sources, however this was the very the group who seemed to have the most difficulty with the consultation material.

Consulting in the Humber River Basin District

The Humber River Basin District incorporates four Environment Agency operational areas (Yorkshire; Derbyshire Nottinghamshire and Leicestershire; Staffordshire, Warwickshire and West Midlands and Lincolnshire and Northampton).

There are two liaison panels established to provide governance across this extensive district; the Yorkshire Liaison Panel and the Trent and Ancholme Partnership. Both panels were involved in discussions and the development of the RBMP consultation and the 'check point' events highlighted in the consultation document were centred around liaison panel meetings in November 2014 and February 2015.

Overall engagement across the Humber RBD was planned and delivered by the Environment Agency catchment co-ordinators. They planned their engagement to make sure that it was coordinated with the Humber Flood Risk Plan consultation to gain the maximum awareness among our stakeholders.

Building on the relationships established during the 'Challenges and choices' consultation of 2013, and working with the two liaison panels and the new catchment partnerships they targeted their engagement around detailed, local discussions with stakeholders and partners on the consultation.

Catchment partnerships were important to engage in the RBMP consultation, with their understanding of the priorities and issues affecting their catchment, and their ability to engage local interest and activity. Targeted meetings and workshops helped these partnerships to explore the consultation data and develop the partnership's response.

Over 71% of engagement with stakeholders in the Humber RBD was face to face, and included 165 meetings and 37 workshops. A number of the workshops were specifically designed to work to help our stakeholders formulate their response to the consultation, by helping them to explore and understand the catchment data, the measures and the cost benefit assessment process.

We also kept staff informed of the consultation and encouraged them to share information on the consultation in any meetings or other appropriate forums they attended with stakeholder groups and partners during the consultation period.

The table below provides details of the engagement activities carried out.

Date	Type of event	Stakeholders involved
22 Oct 2014	**Meeting** to present details on the consultations.	Birmingham City Council Water Group
11 Nov 2014	**Meeting** to discuss the consultations, the catchment based approach, and the specific issues facing the catchment.	South Yorkshire Local Nature Partnership
27 Nov 2014	**Workshop** to discuss the consultation and their priorities for the catchment.	York City Council Green Infrastructure Workshop
02 Dec 2014	**Meeting** to discuss the consultation and highlight their concerns and priorities.	Association of Drainage Authorities
10 Dec	**Meeting** with a joint presentation on	South Pennines Local Nature

2014	the Humber and North West consultations.	Partnership
12 Dec 2014	**Meeting** to highlight the details on the consultations.	Central Lincolnshire Drainage Group (including local planning authorities, Anglian Water, Lead Local Flood Authority and Highways Dept).
19 Dec 2014	**Meeting** to discuss Local Nature Partnership response and how best to liaise with Catchment Partnerships to respond	Stoke and Staffordshire Local Nature Partnership
12 Jan 2015	**Workshop** explaining the consultation, exploring the catchment data, and encouraging their responses.	Natural England and Forestry Commission (North East and Yorkshire)
3 Feb 2015	**Workshop** to inform the Catchment Partnership's consultation response	Dove Catchment Partnership
11 Feb 2015	**Meeting** to highlight the details on the consultations.	Coventry and Warwickshire Local Enterprise Partnership - Planning and Housing Business Group
20 Feb 2015	**Workshop** explaining the consultation, exploring the catchment data, to develop and agree the Partnership response.	Torne Catchment Partnership
25 Feb 2015	**Workshop** highlighting the consultation, the Water Framework Directive (WFD), and the work of the Environment Agency in implementing WFD.	East Yorkshire Waterways Partnership - 50 attendees from professional partners and interest groups.
25 Feb 2015	**Workshop** to inform the Catchment Partnership's consultation response	Staffordshire Trent Valley Catchment Partnership
16 Mar 2015	**Meeting** attended to explain consultation and its role in the wider planning context.	Greater Birmingham and Solihull Local Enterprise Partnership planning sub-committee meeting
18 and 24 March 2015	**Drop-in workshops** to develop local interest in issues affecting operational catchments.	Hull and East Riding Catchment Partnership

We made external briefing packs available on the website, and promoted the consultation locally through:

- Statutory public notice in the Yorkshire Evening Post and the Nottingham Post in October 2014.
- News releases; two to launch the consultation on 10 October 2014 and two reminders at 1 month remaining during week beginning 10 March 2015. These were featured in several local media outlets including the Sheffield Star, the Hull Daily Mail, Telegraph and Argus and Nottingham Post Oct 2014; and the Goole Times, the Burton Mail, Staffordshire Newsletter and BBC Radio Stoke March 2015.
- E-mails sent from Chief Executive Paul Leister to 377 listed Humber stakeholders (158 Yorkshire and 219 Trent and Ancholme); the first on 10 Oct 2014 announcing the launch of the consultations, and a second in March 2015. Reminder emails from the Principal Account Officer, Humber River Basin District to 219 Trent and Ancholme stakeholders two weeks before the end of the consultation

- Social media (38 tweets to over 13,000 followers, with 47 re-tweets potentially reaching a further 37,656 followers).
- partner publications and newsletters – Humber Nature Partnership; Revelation; Midlands Agri-buzz and Humber Bond Holders featured articles on the consultation in their own newsletters to encourage participation.

Feedback received in 55 responses came from the following groups:

Organisation type	Number of responses
Individual	8
Academia	1
Environment management (including NGOs)	22
Farming/land management	3
Government, local	8
Government, national	1
Transport/navigation	3
Utilities	3
Other	6
Total	55

3.3. Northumbria River Basin District

Summary of consultation feedback

The Northumbria River Basin District covers an area from Teesside to the Scottish Borders. Comprising the principle urban centres of Newcastle and Gateshead, Sunderland and Middlesbrough. These urban areas are bordered to one side by the North Sea coast and on the other by Northumberland and the North Pennines. The river basin district contains four management catchments; the Tees, Wear, Tyne and Northumberland rivers.

We received 26 replies to the consultation from a variety of organisations operating throughout the river basin district. The largest number of replies were from the environment management sector which reflects the strong partnership approach to work in the North East.

Those who responded had strong views about the de-designation of small coastal and estuarine streams, particularly since the area covered by the consultation includes numerous coastal communities and an environmentally sensitive coastline.

A large number of respondents found it hard to access the consultation documents and navigate to the information relevant to them with several dependent on the interpretation provided by local Environment Agency staff to understand the content.

The wordle below illustrates some of the most frequently occurring themes that were raised in the responses received.

The following pages summarise the general themes emerging from an analysis of all the responses and highlights areas we need to take into consideration in planning for the future of the water environment.

Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

Sixteen of the 26 replies to the consultation did not agree with the deletion of water bodies in small coastal and estuarine catchments. While recognising the deletion is a reasonable approach to prioritisation, there was strong objection to the deletion on the grounds that:

- The perception would be that it removes the official recognition of that area and therefore undermines the need for action and diminishes funding opportunities.
- No information was given on actions required for non-reportable water bodies and how we will ensure work continues.
- Fails to recognise the current Special Protection Areas and candidate Marine Conservation Zone.
- Removes a focus from deprived, industrial communities and ignores the contribution of coastal water bodies to bathing waters.
- Created a larger water body with significant diversity where status would be difficult to define.
- Did not recognise the potential impact of groundwater water bodies of the aquifers with surface water links.

Within the Northumbria River Basin District (RBD), there was little comment about the proposed changes to inland water bodies and those that did comment were broadly supportive with the exception of comments relating to heavily modified water bodies (HMWB) and concerns relating to a potential impact on the East Durham aquifer.

Several respondents commented that they were not sure that the HMWB designations were accurate. One respondent listed several they would welcome reviews on while another felt that the

designation was *"inconsistent and seemingly arbitrary"* and it was a surprise that an earlier review of HMWBs had led to no changes.

Many responses indicated that the reason for the changes, the justification and the implications for the deleted water bodies was neither clear nor accessible in spite of the significant amount of documentation provided.

Half of the responses to the consultation highlighted the difficulty people had accessing the necessary information to answer the questions. *"The entire consultation is very complex, inaccessible and of limited relevance to the lay person".*

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

One response summarised a consistent view with regards to this question: *"We do not feel it is possible to agree or disagree with individual water body objectives, because we have not been privy to the detail of the individual assessments…"* Many people commented that the water body objectives were not clear while others commented that they did not have the resources or time to comment on this level of detail particularly since this level of information was not available from the consultation documents.

Some organisations found it difficult to comment on objectives on a water body scale when the plan documents did not propose objectives for 2021 or they were uncertain how these statutory objectives would be delivered. Respondents were interested to know how compliance with these objectives would be monitored and how all public bodies would have regard to them when making decisions.

Three respondents also expressed concern that objectives for water bodies were less than good due to no feasible solution to phosphate problems being identified while a further response highlighted the apparent absence of *"chemical status".*

A number of concerns were expressed about alternative objectives which have been set on the basis of being "disproportionately expensive" and questioned whether the cost benefit assessment carried out by the Environment Agency was sufficiently robust to arrive at this conclusion.

With regard to protected area objectives, there was support for the link with Natural England's Site Improvement Plan (SIP) programme. One respondent suggested a review of 2009 measures to understand *"why Annex D measures have not been sufficient to meet the deadline set in the 2009 plans…so we can be confident that the measures held in the SIPs will achieve a different outcome".*

Concerns were expressed that the links between water body objectives and favourable status of Special Protected Areas (SPA), Special Areas of Conservation and Sites of Special Scientific Interest (SSSIs) were not well established. Responses relating to deletion of small coastal streams particularly highlighted the absence of links to candidate Marine Conservation Zones, existing and potential coastal SPAs and the Marine Strategy Framework Directive.

There was very little mention of the other protected areas though several respondents were disappointed that protected species were not considered e.g. the Tyne Pearl Mussel population while some felt that SSSIs were not afforded the same degree of protection as other protected areas.

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

The majority of responses to this question felt that the extremes proposed did not represent a simple choice.

There was a range of replies, from those who thought we should tackle the worst first to those that advocated reaching Good Ecological Status/ Potential everywhere (where benefits outweigh costs as required under the Directive) or where the benefits were the greatest compared to costs. Considering other responses would suggest support for decisions being *"evidence based"* though not in a rigid process which excludes the potential for opportunistic improvements and the inclusion of qualitative measures.

The majority of responses were in favour of locally determined priorities that produce multiple and maximum benefits including social and economic benefits. Several respondents thought this particularly relevant for urban watercourses in areas of *"severe multiple deprivation".* Other responses supported this but recommended considering benefits from actions elsewhere e.g. working in the uplands to improve downstream water bodies.

Q4 "Do you agree the correct measures have been identified?"

Of the responses to this question, 14 respondents agreed or partially agreed – with only one respondent disagreeing.

Two respondents highlighted that for complex water bodies with multiple pressures and failures, reporting generic measures at a high level with little mention of how they will be applied means that the measures would be too general to encourage action to be taken. There were also a significant number of responses questioning the reliance on voluntary measures.

There were concerns that small organisations and local groups would have difficulty engaging at the appropriate level – especially if asked to contribute to multiple catchment groups. Therefore these groups may not gain knowledge of detailed measures nor have opportunity to influence them or contribute.

Throughout the consultation responses, there were comments that people did not have the resources to verify the information that the Environment Agency have collected, that they had not been involved in this process and the dependence on internal expert knowledge and data meant third party data and other information sources were not considered. With a backdrop of reduced monitoring several respondents highlighted this as a risk and opportunity.

There were specific measures which people felt had been omitted due to deliberate exclusion or dependence on Environment Agency data and expertise. Respondents highlighted an omission or lack of ambition to tackle invasive non-native species and also integrate the role forestry into the catchment solutions. A local authority response also highlighted measures to tackle non-native species on their land was *"unrealistic in the current economic climate".* It was also highlighted that some measures included had not been incorporated into water company business plan.

More than one respondent suggested that there was insufficient detail within the consultation on the Tees Barrage and its impact and this therefore represented a serious omission to the measures identified for the River Tees.

Q5 "Do you agree with the way the economic appraisal process has been done?"

Eleven respondents answered this question with opinion being split. Seven responses partially agreed or agreed while four disagreed. The consensus was that this was a complex area of work, to which an awful lot of effort had been applied and it was a valiant effort. However many people felt they did not have the information, resources or skills to comment and it was *"very difficult for a non economist".*

Of specific concern to one respondent was that under scenario 5, the relative allocation of funds to the Northumbrian River Basin District seemed comparatively low and the reasons for this were not adequately explained.

There was general support for the principle of using a cost benefit approach to making the economic case for action and endeavouring to complete the work although many respondents felt that it should only be used as a guide based on the scale, uncertainties and assumptions required. Specific comments related to the exclusion of carbon costs, climate change, quantifying ecosystem benefits, local nature sites, impacts on agricultural sector costs and specifics on the methodology such as inconsistent discounting periods and the difficulty of identifying what benefits have been applied to measures. There was also a suggestion that *"alternative resourcing"* such as voluntary and partnership working should have been incorporated.

Comments were received from partners that they had not been sufficiently included in the process of developing the cost or benefit for their catchments and therefore could not support the results obtained.

Q6 "What measures can you deliver to help achieve the long term objectives?

We received 16 responses to this question. The majority were from the Environment Management sector who responded that they would continue to work on partnership projects with other organisations making use of the links to the community and volunteer base.

Outside of known funding and interventions (such as the water companies' investment programmes) some respondents suggested ways in which they could contribute to improving the water environment. Some of the general themes that respondents gave to this question are summarised below (this is not meant to be an exhaustive list of all suggestions made). A number of individual and smaller sector respondents did however suggest it was hard to see how they could contribute in a meaningful way with lack of certainty over future funding.

Several respondents did raise concerns that those measures not secured through a statutory or guaranteed funding route may not be delivered

Sector	Measures proposed	Location
Environment Management (includes NGO's)	Continued development of the Catchment Based Approach. Develop and deliver partnership projects which tackle the relevant issues. Involve and engage local communities. Wetland and habitat creation at locations agreed with partners.	Across the river basin district (RBD)
Water Industry	Continued support for the Catchment Partnership. Continued safeguarding of the water environment by compliance with current regulatory standards and working together to target future investment where benefits are justified. Activity funded through National Environment Programme in company business plan.	Across the RBD

Individuals	Contribute to catchment partnership.	Across the RBD
	Tees Rediscovered Landscape Partnership voluntary warden scheme.	Tees Catchment
Local Government	Projects supported by Gateshead Green Infrastructure Delivery Plan.	Tyne Catchment
	Work in partnership with landowners and farmers.	Northumberland and Tyne catchments.
	Helping to prioritise action through countryside Stewardship.	
	Making use of volunteers and National Park staff to deliver practical work on the ground.	
	Making use of developer contributions.	Tees catchment.
Agriculture, Woodland and Land Management	Targeting the Campaign for the Farmed Environment.	Across the RBD
	Planning of industry activity.	
	Providing evidence of activity.	
	Consideration of how best to use forestry and woodland activity to achieve shared outcomes.	

Q7 "Do you have any further comments on this consultation?"

We received 20 responses to this question and the majority of these comments related to the consultation material. There were strong messages that the documents were too complex, too lengthy and did not convey the information needed to answer the consultation questions. To be able to comment meaningfully you had to access significant volumes of information which often overwhelmed people.

"The consultation provided an immense amount of information – seven documents – but amazingly there was still not enough information to answer some of the detailed consultation questions."

There were several responses suggesting the format of the consultation will have deterred many respondents but also praise for local Environment Agency staff who provided additional material and support to help people respond to the consultation.

This section was also used by individuals and organisations as an opportunity to inform us of specific concerns for consideration such as: fish migration, siltation and gravel accumulation, issues on the River Pont, mitigation measures for heavily modified water bodies, monitoring, better use of uplands and the suitability of the consultation for engaging relevant sectors.

Consulting in the Northumbria River Basin District

Environment Agency Catchment Co-ordinators in the Northumberland, Durham and Tees Area planned and delivered the engagement on the draft update Northumbrian River Basin Management Plan (RBMP).

The Area coordinated their engagement on the Northumbria RBMP consultation with the Northumbria Flood Risk Management Plan consultation to gain the maximum awareness amongst our stakeholders.

Building on the relationships they established during the 'Challenges and choices' consultation of 2013, and working with the Northumbria Liaison Panel and the new Catchment Partnerships they focussed engagement around detailed and local discussions with stakeholders and partners on the consultation.

The majority of the engagement with stakeholders was face to face (71%), largely through meetings. Over 45 meetings were held with steering groups, Local Nature Partnership's, Liaison Panels, the public, and cross catchment partners. We also attended nine workshops to support partners in their response.

As a result of stakeholder feedback we provided catchment specific information to stakeholders to help them answer the questions posed in the national consultation.

We also kept staff across all departments in the Area informed of the consultation and encouraged them to share information on the consultation in any meetings or other appropriate forums they attended with stakeholder groups and partners during the consultation period.

The table below provides details of the engagement activities carried out.

Date	Type of event	Stakeholders involved
20 Nov 2014	**Workshop** explaining the consultation, exploring the catchment data, and encouraging responses.	Multi-sector stakeholders from across all RBD catchments.
09 Dec 2014	**Workshop** discussion with farmers and local land owners in North Northumberland.	Northumberland Rivers Trust
12 Jan 2015	**Meeting** & presentation on current consultations.	NFU Regional Board
13 Jan 2015	**Workshop** explaining the consultation, exploring the catchment data, and encouraging and supporting their responses.	Natural England and Forestry Commission
15 Jan 2015	**Workshop** discussion on changes in boundaries white spaces for water body prioritisation.	Northumbrian Partners
29 Jan 2015	**Meeting** to discuss current consultations.	Wear Coastal and Estuary Partnership

To support this engagement plan external briefing packs were made available on the website, and opportunities taken to promote the consultation locally through:

- Statutory public notice in Newcastle Evening Chronicle in October 2014.
- 2 press releases; one to launch the consultation on 10 October 2014 and a reminder at 1 month remaining on the 10 March 2015. Both press releases resulted in articles appearing in several local press outlets.
- 2 proactive e-mails to listed North East stakeholders from Chief Executive Paul Leinster, the first announcing the launch of the consultations, and a second reminder in March 2015.
- The Area Manager emailed all local authority chief executives, council leaders and MP/MEPs in October 2014.
- Sector specific briefings were emailed to nearly 200 stakeholders in March 2015.
- Social media (29 tweets to over 13,000 followers, with 44 re-tweets potentially reaching a further 24,855 followers).

- Partner publications and newsletters - Durham County Council featured an article on the consultation in their November Coastal newsletter to encourage participation.

Feedback received in 26 responses came from the following groups:

Sector	Number of responses
Individual	6
Consultant/contractor	1
Environment management (including NGOs)	10
Farming/land management	2
Government, local	5
Leisure/tourism	1
Utilities	1
Total	26

3.4. North West River Basin District

Summary of consultation feedback

The North West River Basin District covers Cumbria, Lancashire, Greater Manchester, Merseyside and Cheshire. It also includes parts of Yorkshire and Derbyshire. There was a good spread of responses from different organisations throughout the North West. Two thirds of them were from catchment partnerships, environmental non-governmental organisations and local government. Sectors such as agriculture, water industry, angling and navigation also responded. There were several responses from individuals. Furthermore, a large number of comments were received via the Save Our Waters campaign.

The level of detail in the responses to the seven consultation questions varied greatly. Some responses concentrated on single issues whilst others gave comprehensive thoughts on all of the questions. Many concerns were raised about the de-designation of small water bodies. A number of people felt that the objectives were not ambitious enough in the short term. Others felt that the measures were too descriptive and lacked local relevance. Another key issue for some was a lack of emphasis on coasts and estuaries. People also asked for better integration between different environmental plans such as those for biodiversity and flood risk management.

The majority of respondents found the consultation difficult to respond to. They felt that access to data and supporting information needed to be better. However, catchment based workshops proved a popular and effective forum for getting consultation feedback.

The wordle below illustrates some of the key themes that were raised in the responses.

The following pages summarise the general themes emerging from an analysis of all the responses and highlights areas we need to take into consideration in planning for the future of the water environment.

Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

Many concerns were expressed about the de-designation of small coastal and estuarine water bodies. Those raising concerns included all of the Catchment Partnerships whose area had a coastline, various eNGOs, NW Coastal Forum, local councils and port and harbour authorities. Reasons given included:

- Over 80% of the NW coastline has protected status for its habitat, wildlife, recreational use and for shellfisheries. Many of the de-designated areas have important wetlands. “Having a site of European importance surrounded by non-reportable areas, whether or not those areas perfectly fit the criteria for WFD appears to be reckless.”
- Bathing waters such as Southport and Blackpool are a vital part of the NW economy. Many of the de-designated waters directly impact them. Reduced monitoring and therefore potentially less action may adversely impact bathing water quality.
- Does not accord with the Marine Strategy Framework and the need to manage impacts on the aquatic environment up to 1 nautical mile from the coastline.
- Areas that are no longer designated may attract fewer opportunities for environmental work including monitoring and funding.
- Many are located within populous and deprived areas with a legacy of industrial pollution. They are some of the worst quality yet locally most important waters.
- Overstates WFD compliance statistics by disproportionally removing poor quality waters.
- Merging water bodies will reduce the value of monitoring as the impact of various pressures will not be differentiated.
- Impacts on species such as eel and salmon will not be monitored nor acted upon in areas on their migratory routes.
- Does not accord with effective catchment management as rivers will not be assessed from source to sea.

The proposed changes to the majority of non-tidally influenced water bodies were largely agreed with. However a number of concerns were raised:

- Some canal feeder streams have been subsumed into natural water bodies. These may therefore be subject to actions without consideration of their use.
- Many water bodies in agricultural areas have never been natural. They function as land drainage ditches. As such they should be designated as artificial or heavily modified. Due to

their small size the majority should be classified as 'Ordinary Watercourses' and not 'Main River'. This has implications for both who manages them and how this is done.

- The complexity of which catchment the Manchester Ship Canal should sit in and how stretches of it should be split led to a range of opinions both in favour and disagreement with the proposed changes.
- The designated uses of some coastal and estuarine water bodies were questioned.

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

Most people agreed with the objectives set for protected areas. However, some expressed disappointment in the lack of progress and extension of deadlines for Natura 2000 ambitions. It was also stated that Natural England's Site Improvement Plans gave insufficient measure detail and that links between good ecological status and favourable condition were not sufficiently developed.

Many respondents were concerned about the lack of ambition with respect to 2021 water body objectives and felt far too much work was being put forward into cycle 3 (2021-2027). It was stated that a level of investment similar to that indicated by Scenario 5 in the economic impact assessment would not be sufficient to achieve the required objectives.

Questions were asked as to how factors such as climate change, population growth, changes to shoreline management policy and farming practices were used to set long-term objectives.

The designation of areas as phosphate vulnerable zones was suggested, as a possible new type of protected area, for tackling eutrophication.

Many people were worried about what the objectives for the de-designated small coastal and estuarine waters would be. There was agreement with the objectives for estuaries and coastal waters (i.e. generally current status in 2021 and good status by 2027) and for the ongoing work to develop specific actions. The navigation sector responses disagreed with the objectives due to mitigation measures not being adequately considered.

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

Some people felt that this question was too simplistic. The general view was that a mixed and balanced approach to prioritising is needed. A range of priorities should be considered including:

- working on water bodies that are easy to improve first
- improving the worst upstream waters first
- targeting upland peatlands and bogs
- focussing on areas that deliver multiple benefits
- concentrating on where people live or use the water environment
- working to benefit people in deprived areas
- balancing costs over time
- giving the greatest economic return
- maximising the expenditure on the water environment
- prioritising where the costs of delaying measures are greatest
- being opportunistic, such as working where permission is available
- focussing efforts on waters with the greatest number of improving elements

- doing work that will help develop partnerships
- prioritising where there is overlap with other Directives (e.g. Marine Strategy Framework, Bathing Water and Floods)

Of the above suggestions improving the worst water bodies was the most frequently suggested priority. It was recommended that work should start early upon the most difficult / politically sensitive waters. Especially, as the costs for improving these were likely to increase over time. Affordability and technical feasibility were also identified as being important considerations.

Others suggested that the priority should be legal requirements such as protected areas and delivering “basic measures” as specified in the Directive.

Q4 "Do you agree the correct measures have been identified?"

Many respondents agreed with the measures. However, many also felt that they were described at too high a level to be able to comment on them properly. A few people asked to see measures at a water body specific scale rather than at river basin district or operational catchment scales. Responses stated that measures were too focussed on the immediate vicinity of the riverbank and not enough emphasis was given to the wider landscape.

Some said measure effectiveness (especially those from the first cycle) needs to be factored in as, for example, there is a risk that ineffective or costly approaches will be repeated.

Greater emphasis was asked for in headwater areas, in particular moorland management such as peatland restoration. This was needed even in areas that didn’t necessarily constitute WFD water bodies. Wetland creation was also highlighted as a useful measure further down catchments, for example on flood prone coasts and estuaries. A lack of monitoring and measures for uplands (e.g. for reducing acidification and dissolved organic carbon) was identified and it was questioned whether the current regulatory regime is a) fit for purpose and b) being effectively implemented in upland areas.

Several responses stressed that tree planting needed greater prominence. The wide range of benefits accrued from planting trees was described.

Some people suggested adding additional measures including environmental education, promotion of sustainable drainage schemes (SuDS) and invasive non-native species (INNS) measures. For example it was felt that the INNS measures that are described will not be enough to prevent the introduction of new species.

A response stated that climate change adaptation measures (e.g. for flood and coastal protection) must avoid adverse effects on protected sites and new habitat should be created to offset any environmental loss. It was also not clear how the measures will deliver ambitions for wildlife set out in the Biodiversity 2020 strategy.

Concern was expressed that the measures were not “future proofed” and that there were no measures to address energy issues such as fracking and gas storage cavern creation or to look at emerging problems such as microplastics.

A common view was that there was an over-emphasis on measures delivered by the water industry sector.

A number of respondents felt that the diffuse pollution measures were generally weak and that voluntary approaches were unlikely to succeed. People said that funded solutions and stricter enforcement of regulations were needed. Better policing of cross-compliance conditions with respect to agricultural buffer strips was cited as an example. Several responses said that catchment sensitive farming was very effective and would benefit from being extended.

A response stated that land management has lagged behind other sectors in reducing pollution and urgent action is needed through Water Protection Zone designation. Key measures that should be specified include fencing and buffer strips, Catchment Sensitive Farming, treatment wetland ditches and better crop management. New water storage should maximise biodiversity.

Opportunities to explore wetland restoration in pumped catchments should be explored especially where there is intensive arable farming.

Several people said that a lack of monitoring in estuaries and coastal waters results in them being under-represented, which in turn results in fewer actions in these water bodies. The current detailed investigations into dissolved inorganic nitrogen and phytoplankton were welcomed.

Mitigation measures for artificial and heavily modified water bodies were criticised for canals, coasts and estuaries as not being well defined and lacking evidence linking them to pressures. It was felt that more work was needed on this, including external consultation with relevant sectors (especially navigation).

Generally people thought that measures need to be better integrated with those in other plans, such as flood risk management plans.

Q5 "Do you agree with the way the economic appraisal process has been done?"

Most people broadly agreed with the approach that was taken for the economic appraisal process but many also raised queries about it. It was stated that the costs describe real cash expenditure that will be found by a responsible party whilst the benefits are mostly intangible and accrue to the general public. Some felt that the analyses favoured urban areas whilst conversely others thought rural areas were favoured.

Many responses suggested that other benefits should have been monetised, such as:

- health and wellbeing
- savings from reduced water purification costs and from ensuring more reliable flows
- habitat creation
- value of restoring contaminated land
- carbon capture (e.g. from wetland or woodland creation) and
- other ecosystem services

Several respondents said that the underlying data, for example the National Willingness to pay for Environmental Benefits (NWEBs), was out of date and incomplete. Many in the voluntary sector stated that they could deliver measures more efficiently and with greater local relevance than those given in the economic impact assessment.

A couple of people questioned the legality of applying the Treasury Green Book approach and stated that improvements should not be ruled out because costs exceed benefits unless all costs and benefits have first been accounted for.

Responses pointed out that the economic analyses were done at different scales and that it would have been better if the cost benefit work was done at the WFD Management Catchment scale rather than the Operational Catchment scale. It was also stated that officers doing the analyses would have different levels of optimism so the economic assessments lacked consistency.

Agricultural sector respondents stated that the distribution of cost impacts on different farming sectors needed to be accounted for and that impacts on food production had not been considered, for example, wetter land in both uplands and lowlands will reduce agricultural output. It was said that spreading costs over 37 years underestimates agricultural costs as the design life of most farm infrastructure is much shorter.

The navigation sector said that mitigation measures for heavily modified waters designated for navigation or water supply should not have been identified where they fundamentally affect the use of the water body for its designated purpose.

Q6 "What measures can you deliver to help achieve the long term objectives?

Many respondents described important work that they could deliver in general terms. This included: developing better relationships through partnership working, promoting good environmental practices, producing local action plans, working with volunteers and communities and awareness raising and educational activities.

Successful bids for Heritage Lottery funding were highlighted, including: Ribble Life Together (Lancashire), Greater Manchester Wetlands Partnership, Saltscape Landscape Partnership (Cheshire) and Meres and Mosses Partnership. Several responses referred to the EU Life Integrated Projects submission which, if successful, will result in an additional 20m Euro funding to help deliver the NW RBMP. This multi partner work (involving e.g. government agencies, local government, the rivers trust and the water industry) will initially focus on the Irwell catchment.

The following table lists some of the more specific measures that were identified in the responses. Note that these measures are illustrative and the table does not summarise the entire programme of work that could be delivered.

Sector	Measures proposed	Location
eNGOs and Catchment Partnerships	Development of CaBA approach	Across the RBD
	Creation of Nature Improvement Area	Lower Ribble
	Working with local farmers to reduce diffuse agricultural pollution	Across the RBD e.g. West Cumbria (Ellenwise project)
	Tree planting such as creating upland woodland (cloughs)	Across the RBD e.g. West Cumbria
	Fish (especially eel and salmon) passage improvements	Across the RBD, specific schemes given for the Ribble (Heritage Lottery Funding for 15 schemes) and Irwell
	Promotion of fish catch and release	Ribble and Bollin
	Create riparian buffer strips	Across the RBD e.g. Douglas and Lune
	Restore river banks	Across the RBD e.g. Bollin and Weaver Gowy
	Installing wood debris	Bollin
	Increase habitat connectivity	Across the RBD e.g. Upper Mersey
	Monitor/ eradicate INNS (including Himalayan balsam and Floating pennywort)	Across the RBD
	Education / engagement work (e.g. guided walks and talks)	Across the RBD e.g. Lancashire, Douglas
	Peatland restoration	Across Cumbria and the Pennines
	Reed bed creation	Douglas, Weaver Gowy (Northwich / Winsford)
Water Industry	Improvements to sewer networks and treatment systems. Support of CaBA through Catchment Wise (various projects including habitat improvements and diffuse pollution control). Provision of data and	Across the RBD

	modelling outputs to help develop measures.	
Industry	Help with chemical investigations.	Weaver Gowy and Mersey Estuary
	Nutrient management (e.g. through , CSF and the Tried & Tested initiative)	Across the RBD
Individuals	Report pollution incidents	Across the RBD e.g. Douglas (R Chor), Ribble, Bollin (R Birkin) and Lower Mersey
Local government	Rain garden creation and water butt uptake	Douglas
	Promotion of sustainable drainage schemes	Across the RBD e.g. Ribble
Coal Authority	Remediation of discharges from abandoned mines	Across the RBD
Government	Opportunity mapping (e.g. for tree planting and river valley habitats)	Across the RBD

Q 7 "Do you have any further comments on this consultation?"

The majority of respondents found the consultation onerous and hard to understand. People had difficulties delving into the information at the local detail that they needed. The catchment data explorer and geopdf files where criticised for being complicated to use and not being up to date. Several respondents were complementary about workshops that were used for explaining the materials and for helping them to develop their response.

Some organisations strongly criticised the lack of emphasis on coasts and estuaries. An integrated coastal management approach was called for involving catchment and coastal partnerships working together to ensure that WFD obligations out to 1 nautical mile from the coastline are met. Other points made were that coasts and estuaries have not benefited from the same level of monitoring nor understanding as inland waters and that economic analysis information was not available for them.

A couple of respondents said that the benefits of regulation are understated and their burden is often overstated. They said greater application of the polluter pays principle was needed. Conversely other responses asked for reductions in environmental regulation.

A response stated that there was not enough emphasis on groundwater issues in the consultation.

Consulting in the North West River Basin District

In the North West River Basin District the consultation was promoted in a broad range of ways, making use of social media through to more traditional workshops and face to face meetings. A total of 53 workshops/meetings across the 12 catchment partnerships, local government & local nature partnerships, environmental organisations, sector representatives and statutory bodies were held. 221 stakeholders were contacted at the beginning of the consultation, in addition to 32 tweets to the 11,500 Environment Agency Twitter account followers, over the 6 month consultation period.

A statutory notice was placed in the Lancashire Evening Post at the beginning of the consultation and further press releases were published in the Westmoreland Gazette and the online publication, Champion in the final month of the consultation.

The most significant change since the consultation for the 1st river basin management plan has been the advent of the Catchment Based Approach. This resulted in a series of catchment specific workshops co-hosted with Catchment Partnerships, covering the whole river basin district and allowing people to develop their consultation response with their own catchment in mind. Additionally, wherever appropriate we also promoted the consultation for the flood risk management plans at the same time.

The table below provides details of the main workshops and meetings held.

Dates	Type of event	Stakeholders involved
26.03.14, 10.09.14, 03.11.14, 13.01.15, 12.02.15, 13.03.15	Meetings & Workshops	Rivers Return Catchment Partnership (Irwell)
01.07.14, 29.07.14	Meetings	South Cumbria Rivers Trust
03.07.14, 09.09.14, 20.11.14, 25.02.15	Meetings & Workshops	Upper Mersey Partnership
11.07.2014	Meeting	Mersey Estuary Forum
14.07.14, 21.10.14, 19.01.15	Webinar & Workshops	NW Liaison Panel members
16.07.14, 09.10.14, 20.01.15	Meetings, Workshop	Weaver Gowy Catchment Partnership
16.07.14, 24.09.14, 02.10.14	Meetings	Mersey Estuary Catchment Partnership
17.07.14, 09.10.14, 17.12.14	Meetings	Alt Crossens Catchment Partnership
30.07.14	Meeting	Groundwork West Lancashire & Wigan
05.08.14	Meeting	Coniston & Crake Partnership and Duddon Rivers Trust
15.08.14	Meeting	Irwell Rivers Trust
27.08.14, 01.10.14	Meetings	Healthy Waterways Trust
04.09.14	Meeting	West Cumbria Rivers Trust
01.10.14	Meeting	Greater Manchester Wetlands Partnership
13.01.15	Workshop	Weaver Gowy Agricultural Sector
10.10.14, 08.01.15	Meetings	Wildfowl & Wetlands Trust
13.10.14, 13.01.15	Meetings	Douglas Catchment Partnership
15.10.14, 25.02.15	Meeting, Workshop	Lune Catchment Partnership
16.10.14	Meeting	Cumbria County Council Lead Local Flood Authority
21.10.14	Meeting	Bollin Environmental & Conservation (Beacon)
24.10.14, 23.01.15	Meeting, Workshop	Ribble Catchment Partnership
30.10.14	Meeting	Wyre Catchment Partnership
20.11.14	Meeting	Atlantic Gateway - Sustainability and Environment Group
03.12.14	Meeting	Merseyside & Gtr Manchester Flood Risk Partnerships - (Flood Risk Officers Group)

06.12.14	Meeting	NW Salmon Forum (NW Fisheries Consultative)
10.12.14	Meeting	South Pennines Local Nature Partnership
16.12.14	Meeting	National Farmers Union (NW)
13.01.15	Meeting	Liverpool City Region's Nature Connected Board (Local Nature Partnership)
13.01.15	Workshop	CLASP (local authority and public sector sustainability support service for the NW)
14.01.15	Workshop	Campaign for the Farmed Environment (NFU & Douglas Catchment Host)
20.01.15	Workshop	Coastal and estuary workshop for dissolved inorganic nitrogen and phytoplankton issues
26.01.15, 18.02 - 31.03.15	Webinar, Meetings	Environment Agency for Mersey Docks & Harbour Company (Peel Ports Ltd)
03.02.15	Meeting	Countryside and Landowners Association
11.02.15	Meeting	Meres & Mosses Landscape Partnership (Weaver Gowy)
18.02.15	Workshop	Chemical Industry Association
13.03.15	Workshop	NW Regional Flood & Coastal Committee

Feedback received came from the following groups

Sector	Number of responses
Individual	2
Environment management (including NGOs)	26
Farming/land management	4
Government, local	9
Government, national	2
Leisure / tourism	3
Transport / navigation	4
Utilities	1
Not entered	2
Total	53

3.5. South East River Basin District

Summary of consultation feedback

The South East River Basin District encompasses two Environment Agency Areas; Solent and South Downs and Kent and South London. The environment of the South East River Basin District covers the North and South Downs, the White Cliffs, the Solent and the New Forest. More than 3.1

million people live here, and there are major urban centres at Brighton and Hove, Southampton, Portsmouth and Ashford.

Responses came in from a wide cross section, including sector responses from the water industry and agricultural organisations. The majority of responses came from environmental management organisations, including catchment partnerships and wildlife and rivers trusts.

There were a number of specific local issues that have been sent to local Environment Agency teams and Environment Agency catchment co-ordinators for further consideration. Other issues raised will be assessed at a national level to ensure consistency.

Responses varied from single issues to widespread discussion around the plan with some respondents answering all the questions and others respondents concentrating on the questions that were most applicable to them.

The following pages summarise the general themes emerging from an analysis of all the responses and highlights areas that the Environment Agency need to take into consideration as we move forward in planning for the future of the water environment. The wordle below illustrates some of the key themes that were raised in the responses.

Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

Within the South East River Basin District, many respondents raised concerns about the deletion of water bodies, specifically the impact this may have on ensuring action is taken in those areas and the effect this may have on potential funding opportunities. This may then impact of the work and improvements third party organisations are able to carry out. One consultee raised the concerns that changes to the water body boundaries may affect the regular monitoring by the Environment Agency. It was highlighted by a number of respondents that many of the water bodies that have been removed are in highly populated areas, which could result in reducing the engagement opportunities available.

Consultees were also concerned about how the removal of smaller coastal streams could result in the issues affecting transitional and coastal water bodies (TraC) being missed. Assurance was sought that the removal would not undermine the achievement of the protected area objectives.

It was suggested that the lack of understanding of TraC waters should mean that a key target of the RBMP should be to address the lack of evidence for good ecological status in TraC waters. It was felt that in many cases, the TraC waters are the most important component of the overall water body in terms of the natural services they provide and the habitats and species they support, as well as the pressures that they are under from pollution and other sources.

Local organisations have highlighted that sensitive habitat unique to the South East River Basin District such as the New Forest could be particularly sensitive to changes to water body boundaries. For example the New Forest has a number of short sub catchments where consultees were concerned that the water body changes may mean that that environmental quality of upper reaches and headwaters may not be fully reflected in reporting. One local group highlighted that the Isle of Wight has had many of its water bodies merged.

One organisation felt that the plan should acknowledge the role and status of the High Weald Area of Outstanding Natural Beauty in maintaining and enhancing the Rother catchment and the integrity of its landscapes.

There was a concern that SPA's are not mentioned within the consultation document as a priority designated habitat.

However some consultees did agree with the changes to the water bodies, including one local authority who supported the changes as these are based on *'new and most up to date data and more accurate mapping information.'*

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

The majority of respondents partially agreed with the objectives, and raised concerns with specific water bodies and local priorities especially where the objective for the water body is less than good.

For example a local wildlife organisation was disappointed that a fifth of the water bodies within the East Hampshire catchment, and over a quarter within the Isle of Wight catchment, have a long term target status of less than good. They were also disappointed in Lower Test and Southampton Streams objective of moderate and moderate for Southampton Water.

A number of respondents suggested that greater clarity is needed around the objectives and also around the timescales for delivery. Some people felt that the consultation document does not make it clear that the long term objectives relate to 2027 and beyond.

It was considered by some consultees that the plan lacked ambition and there was concern that achieving the objectives of WFD was being pushed back to 2027. Stakeholders felt that more actions to get to good should be brought forward to within the second cycle plan and be funded appropriately.

There was a suggestion by a few stakeholders that the RBMP needs to clearly state which water bodies will reach good ecological status/potential by 2021 and which by 2027.

Concerns were voiced over the change in the second cycle whereby it is the objectives that are statutory requirements rather than the specific measures. This raised the issue regarding how will outcomes will be successfully delivered with any certainty if the measure required to meet the objective are not statutory and enforceable. The point was raised by water companies that that if only water industry sector measures are delivered the overall WFD objectives will not be achieved, and that all sectors need to play their part.

Some consultees welcomed the opportunity to input locally into discussions

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

There was a range of replies to this question, from those who thought that the priority should be to maximise the number of water bodies at good status and also prioritise the actions to maintain them at this level without deterioration, to respondents who thought that the water bodies in the worst condition should be prioritised first.

A number of consultees felt that projects that are cost effective but delivered wider benefits and wider ecosystems services should be prioritised. For example projects that also resulted in additional benefits like biodiversity, flood storage, fisheries benefits, resource protection and green space provision. Some respondents commented the aim should be to maximise the most improvements regardless if this results in an improvement to status.

A number of respondents to the consultation thought that prioritisation should be decided at a catchment level by local partners, with some consultees advocating a case by case basis. For example, *'where there are Salmonid spawning gravels, or the presence of BAP threatened species i.e. the Brook Lamprey within a failing water body, improvements would be especially desirable because improving conditions in these upstream locations benefits downstream water bodies by increasing their ecological diversity.'*

A national farming organisation felt that the focus should be on those issues which are most important. For example; protected areas or those which are highly valued locally should be prioritised along with those solutions which are realistic and affordable.

It was felt by some that a mix of approaches may be needed depending on the reasons for failure, cost and feasibility of the actions to improve the waterbed. Targets that are suitable to the different conditions and situations that exist across the country were also suggested.

Q4 "Do you agree the correct measures have been identified?"

The majority of respondents found that the measures proposed in the consultation documents were too high level and generic, which therefore made it difficult to comment on the appropriateness of the actions at the level presented. One planning authority responded *'It would be much more helpful if the draft plan and/or the catchment summaries identified what actual measures have been selected and applied to each operational catchment'*

One eNGO also highlighted concerns about the lack of a systematic review of the measures implemented during the first cycle. Some people raised concerns about the deliverability at a catchment scale and how actions will be implemented on the ground. Clarification was sought over the national measures with respect to implementation, coordination and accountability at a catchment scale. The lack of a timetable for delivery of the national measures raised concerns that it is not clear how progress in delivering the plan will be assessed, how we will ensure alternative measures can be put in place and who is accountable.

A number of consultees, including local groups, felt that measures to combat invasive non-native species should be included with the draft river basin management plan and also recognise the role that woodlands could play in catchment solutions.

A Planning Authority suggested that the South East River Basin Liaison Panel could assist in the implementation of measures through direct contact with senior management of partner organisations and other relevant stakeholders.

One catchment partnership raised concerns regarding low lying coastal catchments such as the Rother and Romney catchments and the apparent lack of measures currently included in the plan to tackle the effects of saline intrusion into water bodies, particularly groundwater bodies.

Water efficiency actions were highlighted by local authorities as an area where more measures could be included in the RBMP, and additionally a local catchment group felt measures should focus on ensuring we reduce the amount of water we use both domestically and in industry.

Comments from the agricultural sector were that there should be a priority towards a non-regulatory approach to measures encouraging voluntary action and industry-led activity through the various agri-environment schemes and ensuring good locally specific advice is available. The same sector also expresses concerns on the extent of diffuse pollution that is attributed to the sector. However the view from a planning authority was that that enforcement associated with rural diffuse pollution should be given more priority, and that Rural Payments Agency should join catchment partnerships.

The role that catchment partnerships and local groups, play in helping deliver environmental improvement and the goals of WFD by working closely with local communities was highlighted. One catchment partnership expressed support for the identification of the importance of trying to tackle rural diffuse pollution through partnership working with landowners, although another local group felt that the plan did not put enough emphasis on managing agricultural pressures.

One water company sought clarification over the ownership and accountability of actions within the plans. It described how the Flood and Water Management Act offers opportunities for clarity on ownership of measures for flood protection, and that these would also have potential benefits for water quality, and wider WFD objectives.

The link between low flows and WFD was raised, and it was felt this had not been addressed in the consultation document along with a decline in fish stocks.

Strategically, comments were made that measures in this plan should be integrated with other plans such as FCRM plans, marine strategies and local authority plans. This should also include the promotion of Sustainable Urban Drainage Schemes (SuDs).

Q5 "Do you agree with the way the economic appraisal process has been done?"

Consultees appreciated that this was a complex area of work, and noted that improvements had been made from the first cycle, but that it was hard to assess without knowing the detailed methodologies used. There was general support for the principle of using a cost benefit approach to making the economic case for action and endeavouring to complete the work.

However a number of catchment partnerships and local groups felt that the cost benefit assessment should include the wider monetised benefits using an ecosystem services approach. For example, one catchment partnership states *'Almost no non monetised benefits of achieving GES were identified for the whole of the Eastern Rother River and Romney marsh. We find this to be inaccurate and suggest that a re-evaluation of the cumulative values of soil formation, carbon storage, flood storage, water purification, coastal sea defence, cultural benefits and more should take place.'*

Concerns were voiced over the use of NWEBS to give an indication of people's willingness to pay. Some consultees felt that there was potentially more up to date information such as water company willingness to pay data that could be used, and that NWEBS underestimates the amount people would be willing to pay. Issues were raised with the use of national costs for measures.

One catchment partnership felt that it was unclear how the assessment had taken account of the additional costs of climate change adaptation as well as requesting that the alignment of funding between the RBMP and the Defra funding needs clarifying.

National agricultural organisations highlighted that they felt the impact that the WFD measures will have on the agricultural sector and the ability for farmers to cover the costs that are suggested to meet WFD objectives had not been taken account of within the assessment. These organisations raised concerns that WFD measures proposed could place a significant cost burden on the

agricultural sector and individual farmers. It is suggested that the actual costs of agricultural measures could be higher than those assumed in the CBA work.

Concerns were raised that urban projects were coming out disproportionately costly, and how this could potentially conflict with government priorities.

One water company raised concerns over inconsistency in costs used for different sectors in CBA work and also noted that successful delivery has been estimated using a 'bundle of measures' approach and how this makes it even more important that all sectors deliver the measures required, to ensure that the objectives are achieved. This relates to an eNGO who stated *'The Plan needs to be more inclusive of the sectors involved in its delivery identify a more holistic and comprehensive set of mechanisms through which improvements can be funded and delivered.'*

Q6 "What measures can you deliver to help achieve the long term objectives?

Many of the responses made under this question were supportive of the partnership approach, with many local catchment groups, partnerships and wildlife trusts explain the types of project and work they are involved in, showing the great work that is currently either being undertaken or planned at a local level.

eNGOs actively deliver, habitat restoration, river and wetland management land advice, practical habitat improvements, and non-native species projects, both directly and in partnership with others.

The water companies will be delivering the schemes under the National Environment Programme (NEP), including schemes to address diffuse and point source pollution, mis-connections programmes, eel screens, catchment management schemes, schemes to address low flows.

Local groups and eNGO are often working in partnership with planning authorities and water companies. These organisations often offered to work with the EA and share they local expertise. However there were a number of comments that local catchment groups could do more if they had more available longer term funding and that a secure source of multiyear funding is needed to ensure actions are taken forward.

It was highlighted that significant liaison with landowners and local stakeholders, improved monitoring and consultation is needed to ensure that the measures deliver the required WFD objectives.

The table below summarises some specific actions and projects that were highlighted in stakeholders' responses to question 6 as projects already being undertaken or those that would happen if funding was available.

Sector	Measures proposed	Location
eNGOs and Catchment Partnerships	Catchment Action Plans - most catchments are developing or have in place a local level plan of action but are seeking funding to deliver.	RBD
	Habitat restoration projects.	Catchment
	Projects to address both rural and urban diffuse pollution in sources of groundwater in Brighton and Lewes.	Catchment
	Proposed partnership project on the River Ems with water company and Fishing Trust.	Catchment

Extend partnership activity linking woodlands to water.	Catchment
Improvements to fish and Eel passage by removal of obstructions or modification of existing structures and provision of eel and fish passes.	RBD
River restoration and channel rehabilitation schemes.	RBD
Invertebrate surveys, winter sea and brown trout redd counts, walkover surveys and cleaning gravel in salmonid spawning locations.	Catchment
Actively deliver non native species projects.	Catchment
Working with Portsmouth and District Anglers Society to fundraise for a fish refuge from landfill communities funds and are supporting the Wild Trout Trust in work installing a fish pass with Catchment Project Funding.	Catchment
Water quality assessment with communities as a tool for engagement as well as an opportunity to aid technical understanding.	Catchment
River restoration project at Deepsprings to Racton Park Dell reach of the River Ems.	Catchment
Provide advice and support to landowners on river management, riparian responsibilities and good farming practices.	RBD
Expanding reed wetlands to better absorb leachate from nearby landfill.	Catchment
Advice and grants to land managers to reduce nitrate/phosphate inputs, manage livestock round watercourses.	RBD
A practical delivery project to look at reducing sediment pathways to be piloted on the Bourne Rivulet and Cheriton Stream.	Catchment
Establishing Rivers Week to engage wider stakeholders and further equip landowners and volunteers to undertake proactive habitat enhancements.	Catchment

	Deliver a riparian tree planting project as part of the 'Keeping Rivers Cool' initiative.	Catchment
	Awareness raising project around septic tanks and phosphorus levels in household effluent, focusing on rural headwaters.	Catchment
Water Industry	As included in the statutory business plan including demand management and metering, leakage reduction, phosphate removal, shellfish improvements and chemical investigations.	RBD
	Working in partnership with local groups.	Catchment
Agriculture	Engaging with agriculture.	RBD
	Good advice and guidance to achieve behavioural change.	RBD
	Assisting the targeting of Campaign for the Farmed Environment.	RBD
	Planning of farming industry WFD activity, evidence of activity.	RBD
	Farm advisor training.	RBD
Local government/Planning authorities	Leading a project restoring habitat in South Pond, Midhurst.	Catchment
	Co funding research to the research project 'accounting for sediment transfer along the Rother' that will identify a programme of river restoration across the river catchment	Catchment
	Planting of tree buffer zones.	Catchment
	Working with local partners to bring significant changes to irrigation efficiency.	Catchment
	Encourage the retrofitting of SUDS within highways schemes, subject to funding and land availability.	RBD
	Ashford integrated water cycle strategy.	Catchment
	Ensuring all new major development in the Ashford Urban Area reduced consumption of potable water by achieving Code for Sustainable Homes level 3 or 4.	Catchment

	Influence planning applications which impact water quality and quantity.	RBD
	Promote Water efficiency in developments.	RBD

Q7 "Do you have any further comments on this consultation?"

The majority of comments stated that the consultation material was too lengthy and complex, making it difficult to interrogate, and therefore difficult to provide a response to some questions.

It was felt that there needs to be better links between other plans such as Shoreline Management plans, Flood Risk Management Plans and Local Authority plans.

Some consultees also felt the link with water quantity and quality was not clear in the consultation.

There was some positive feedback for engagement for water industry sector and also at a local catchment group level and lots of offers to engage with the EA.

One consultee recommends a review of the use of ‘one out all out’ and perhaps moving to a mechanism of recognising within category improvements or recognising the numbers of individual parameters within a water body that are at ‘good status’

One respondent noted the statement on climate in the consultation would encourage work of this nature to be completed and included in the updated plan.

‘Climate change measures have not been explicitly described within this draft plan or the catchment summaries although many of the suggested measures will result in increased climate resilience or carbon management. It is anticipated that catchment partnerships will explore options to address climate impacts through their work, supported by local Environment Agency evidence and expertise'

Consulting in the South East River Basin District

To publicise the consultation, external briefing packs were made available on the Environment Agency website and the launch emailed to over 35 interested parties.

Local Environment Agency staff, mainly led by Catchment Coordinators, attended over 50 meetings or workshops to discuss the consultation and help interpret the information and range of documents available. Many environmental organisations attended these events for example, river and wildlife trusts, catchment partnerships, water companies, local government, community river groups and interested individuals. Types of events attended including a workshop for the members of the South East River Basin District Liaison Panel, a joint water company meeting to provide information to help engage further and respond to the consultation, a workshop with the Coalition for Blueprint for Water, a meeting with the Wildfowl and Wetlands Trust and a meeting with the Kent Climate Change Network.

Tweets were sent out to ask people to have their say on the draft plan and reminders sent 4 weeks before consultation end. Hard copies of the draft plan and associated documents were also made available at Environment Agency offices and a number of requests came in directly for electronic, CD and hard copies of the plan to be posted out. Email requests for further data and information were also provided throughout the 6 month consultation period.

The different types of communication tools used to inform interested parties about the consultation is reflected in the range of responses we received back, as displayed in the table below:

Feedback came from the following groups:

Sector	Number of responses
Individual	1
Business/commerce	1
Environment management (including NGOs)	9
Farming/land management	4
Government, local	4
Government, national	2
Transport/navigation	1
Utilities	2
Other	9
Total	33

3.6. South West River Basin District

Summary of consultation feedback

The consultation for the South West draft River Basin Management Plan received a total of 41 South West specific responses from a range of different organisations, groups and individuals. All these responses have been thoroughly read, and this report summarises the main points raised. Some responses included a high level of detail which has been passed to the relevant local area teams to inform local river basin planning. The highest number of responses came from catchment partnerships and environmental non-governmental organisations (eNGOs).

Below is a summary by each question of the main points raised.

Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

There was overall agreement to the proposed boundary change between the Severn and South West River Basin District with the Brue and Axe operational catchment moving into the South West River Basin District. One responder proposed that the whole Bristol Avon management catchment is moved into the South West River Basin District instead of being partly in the Severn and South West River Basin Districts.

Lots were concerned about the proposed amalgamation of small coastal streams in the water body network. It was commented that in the South West River Basin district this would have a disproportionate effect with a 37% reduction in water body units. It was questioned what effect this would have on monitoring the quality of these waters and concerns were raised that by not reporting on them directly their importance would diminish. It was remarked that it has fragmented one catchment partnership reducing engagement opportunities. In another catchment concerns were expressed that ongoing projects may lose impetus and/or funding because of the changes to the water body network.

It was mentioned that the Environment Agency lists of designations did not include UNESCO Biosphere Reserves. It was stated that the North Devon and River Torridge catchment is entirely within the biosphere reserve designation and should be recognised in the plan.

A few respondents were concerned that some new heavily modified water body designations in the river basin district would result in lower and less ambitious targets being set. It was expressed that there was a need to safeguard high water quality targets even if classified with a heavily modified water body designation.

Some commented that the river basin management planning process is not currently monitoring or driving improvements and concerns were raised about the impact the new building blocks would have on reporting improvements through a shifting the baseline.

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

Most people either agreed or partially agreed with the objectives proposed for water bodies and protected areas with the following comments.

There were a large number of responses asking for a wider group of ecosystem services to be considered in the cost benefit analysis. It was questioned if the cost benefit analysis for river water bodies had taken into account the benefits of work on downstream waters for example in estuaries and coasts. Concerns were raised that a failure to recognise these benefits may have limited the ambition for water bodies.

One respondent commented that it was not clear how the wider duties of the Environment Agency with regard to the historic environment were being dealt with and they stated that there were possible significant conflicts between the Water Framework Directive and this duty.

Some asked if there was an opportunity to integrate delivery with the Marine Strategy Framework Directive and other relevant marine drivers. There was a perceived lack of information in the river basin management plans on how improvements would be made to transitional and coastal waters.

There was support for proposed objectives which were securing favourable conservation status of water dependent special areas of conservation and special protection areas.

Water companies identified that objectives should include Drinking Water Protected area objectives.

One responder was concerned that there was no monitoring or warning system of water quality in estuaries and coasts used for recreation, similar to that deployed on bathing waters. They commented that with the combined sewer overflows discharging into these waters there was a possible health risk.

Several people stated that the objectives were not ambitious enough, and were concerned about what the wider message of this would be.

“In the Hampshire Avon in Wiltshire for several of the key water bodies (Upper Hampshire Avon, Nadder) the objectives for 2027 are downgraded to moderate and even poor. This lower ambition for these water bodies will severely affect the power and possibilities of statutory bodies and NGO's such as ourselves to influence river and land users to improve the ecological conditions as there will be a less strict legal obligations. We want to raise the objectives for all water bodies in the operational catchment to at least 'good'”.

One catchment partnership identified lots of issues with Phosphate and queried without significant water industry investment they would not improve. It was then questioned if the proposed objectives were realistic.

Many commented that all water bodies should have objectives for good ecological status, and that it was not clear from the data what had changed between cycle 1 and cycle 2.

There were concerns that if some cost effective measures were deferred beyond 2012 then the expected cost of addressing many of the causes of failure would be significantly greater in the next cycle.

It was asked that if Scenario 5 of the Economic Appraisal is followed in the final plan that there was an expectation that the river basin management plans will still set out the measures needed to deliver good ecological status or potential post 2021. Accompanied by a clear explanation of how the affordability barrier would be tackled.

Some of the agriculture sector stated that the objectives proposed were almost all of the same generic nature and gave no real understanding of what is achievable, affordable or realistic. They declared that there was no sense of realism about the size of the task and the amount of funding required to achieve the proposed objectives. For example farmers in some Safe Guard Zones in the Wessex area were already meeting best practice guidelines. They remarked that to go further would require major impacts on farming models and viability.

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

There was no agreement on one clear approach, with many different opinions expressed. A few commented that each catchment needed to consider its own priorities. The responses to this question have been displayed in the graphic below with the size of the wording representing the greater number of replies.

Q4 "Do you agree the correct measures have been identified?"

There was a wide range of responses to this question with a high number partially agreeing with the measures identified and a couple disagreeing. Some provided additional information which has been passed to the appropriate teams in the local areas. This will be reviewed for the final plan.

Many considered that the measures set out in the draft river basin district plan were too high level, too abstract and did not have enough detail to allow meaningful comments to be made. Several asked for a clear one-to-one translation from monitoring, to reasons for failure to water body specific measures.

There was concern that there had been a lack of a systematic review of the effectiveness of measures implemented in the last cycle to inform and update where to target resources. It was

perceived that this was needed to allow statutory measures to be put in place where voluntary measures had failed.

A few people mentioned that it was unclear where the measures for protected areas would be included with in the river basin management plan, and how they were accounted for in the cost benefit analysis work.

The agriculture sector perceived that the extent of diffuse pollution from agriculture is overstated. They strongly questioned the assumption that point source pollution is now known and understood. Due to the variability of the sampling regime, they commented that there was a risk that point source discharges were being misidentified as diffuse pollution.

The agricultural sector commented that a one-size fits all policy to tackling diffuse pollution issues would not work, and that a targeted approach using local evidence was required. They stated that the Campaign for the Farmed Environment (CFE) approach achieved its aims through a combination of promoting best practice and tools, locally targeted uptake of incentivised management and CFE voluntary measures.

A fishing association commented that there was insufficient focus on the adverse effects of abstraction and that the major failure was agricultural pollution. They observed that there had been lots of initiatives but not enough enforcement.

It was remarked that in the transitional and coastal waters document there was no reference to the adverse impact of overfishing of migratory salmonids or sea fish.

There was general support for the Catchment Sensitive Farming and Countryside Stewardship Schemes.

One respondent observed a lack of cross referencing between the Environment Report and the objectives and measures in the draft river basin management plan. Concerns were raised about the removal of historic structures in river channels.

One catchment partnership identified a lack of consistency between the measures identified and the catchment initiative action plans. It was observed that whilst most action plan measures could be moulded to fit a generic measure from the river basin management plan the whole process would benefit from a bespoke measures list, providing a more robust analysis at the sub-catchment level.

It was proposed that the role of shellfish aquaculture could be a national level mitigation measure to reduce nutrient levels in other vulnerable estuarine situations.

The water industry expressed concern that their level of contribution was not fully acknowledged, and that measures such as the Chemical Investigations Programme were not mentioned. They stated that this is a significant investment across the water industry (circa £100m).

The water company sector stated that the Environment Agency believes that permits of <5mg/l BOD and <1mg/l NH 3 are appropriate in the future. They warned that these were achievable at significant cost but that it was questionable as to whether standards this tight would need to be achieved all year round to meet the Water Framework Directive objectives, and that customers should be asked if they support this.

One partnership noted that there was catchment support for the development of climate change adaptation strategies that are part of more realistic scenarios. For example building in consideration of long term reduction in water flow in 30 years' time and taking account of diminished landscape value over the long term as woodland ash and other species disappear.

One group expressed concern that the metals influence from historic mining, would mean that good ecological status could not be reached in most of Cornwall. It was suggested that the Environment Agency could look at alternative sources of funding like health and well-being boards to fund potential measures.

One responder mentioned that tidal lagoons were not included as a measure in the plan, but that they had the potential to deliver a wide range of economic, social and environmental benefits.

Q5 "Do you agree with the way the economic appraisal process has been done?"

The majority of those who answered this question partially agreed with the economic appraisal process but made a wide range of comments which are summarised below. A large number did not comment. They said that the documents were not clear and they did not understand the process clearly enough to make an informed judgement. A couple of responders disagreed with the process. All comments will be considered as part of the refresh process which the Environment Agency is undertaking prior to the publishing of the updated river basin management plan.

Many commented that the list of ecosystem services used in the economic appraisal process were not wide enough. A few people mentioned that the economic appraisal process did appear to take into account the opportunity cost of not having water bodies at good ecological status/potential. For example the water quality in the estuaries and coasts of the south west is a critical driver for the economy, with Surfing worth £55M per annum to the North Devon economy, the recreational value is underplayed.

Clarification was asked for on how costs to improve sites of special scientific interest and special protection areas were accounted for in the economic appraisals, due to the requirement to return theses to good ecological status. Some observed that by excluding the monetised value of these ecosystem services there was a missed opportunity to show value, as less money is required outside the statutory work to return the river to good ecological status and the ecosystem services likely to be provided are identified as positive.

The landowners and agricultural sector perceived that the economic analysis did not consider the potentially significant cost burden of measures on the agricultural sector. They remarked that this could not be borne by farmers alone and that there could be significant local and national impacts on food production.

The wildlife sector commented that the cost benefit analysis failed to correctly value the restoration of the water environment and its ecosystem services such as the approach promoted through the UK national ecosystem assessment. They remarked that it was unclear how the delivery of ecosystem services had influenced the choice of one measure over another and those that achieved wider benefits would be favourable.

A couple of responders identified that poor water quality in North Devon has resulted in shell fisheries being a large untapped resource for the local economy which is not covered in the cost benefit analysis.

The tidal lagoon industry identified that the economic analysis recognises the increase in physical modifications driven by climate change and population growth but only identifies resulting need for flood protection, land drainage and water impoundments. They asked that it should recognise the delivery of renewable energy and managed realignment to address coastal squeeze.

Some of the catchment partnerships said that they could not assess whether the outcome of the cost benefit appraisal were realistic without a full list of costed measures. It was indentified that other landowners like the Ministry of Defence may be able to contribute to water body improvements.

In Somerset there was support for the addition of enhanced measures for natural flood management, to help improve the cost-benefit ratios of some of the proposed measures. It was mentioned that the economic appraisal of all delivery and improvement measures needed to link to the aims and objectives outlined in the 20 year Somerset Flood Action Plan and the activities of the newly formed Somerset Rivers Authority.

The water company sector highlighted the need to prioritise drinking water protected areas and commented that delivering objectives in the third cycle would be challenging.

The fishing sector commented that the economic appraisal did not include the value of salmon and trout fisheries and the benefits of improving them or the non-benefits of further deterioration. They

observed that there was no analysis of the value of commercial and recreational sea fisheries other than shellfish.

Concerns were raised about the low value placed on agricultural land compared to urban areas. It was perceived that agriculture in the South West was not fully valued and that food security was not considered within the ecosystem assessments. It was also commented that by prioritising by population density it would be problematic as large areas of the south west have a low population density

The agriculture sector disagreed with the cost benefit process and questioned whether in the 'Diffuse Pollution Manual' many of the measures were widely tested. They commented that under different farming scenarios they would not be the best available technology. They raised concerns that it would be easy to overestimate effectiveness and underestimate costs to produce a cost beneficial set of measures for agriculture.

The agricultural sector were concerned that existing Countryside Stewardship agreements would focus budgets on biodiversity targets and agri-environment schemes would therefore not make all measures affordable in all areas.

Q6 "What measures can you deliver to help achieve the long term objectives?"

Lots of information about local projects and initiatives which are working towards improving the water environment was provided. Below is a summary table representing information, which has been passed to local area staff to inform river basin planning.

Sector	Measures proposed	Location
eNGOs	Source to sea project	Catchment
	Wessex Chalk stream project	Catchment
	Beach and river cleans	Catchment
	Projects to control INNS	Catchment
	Exmoor mires project	Catchment
	Funding for electro fishing studies	Catchment
	Upstream thinking delivery	Catchment
	Exe estuary partnership delivering SPA management scheme	Catchment
	Floodplain woodland project North Devon	Catchment
	Offers of help with monitoring river levels	
	Verderers New Forest restoring mires and watercourse, meanders and floodplain.	Catchment
	Catchment sensitive farming delivery	Catchment
	Freshwater pearl mussel project	Catchment
	Culm grassland flood risk project	Catchment
	Wessex woodlands for water	Catchment
	Keeping rivers cool project	Catchment

Catchment Partnership	Catchment Action Plans - most catchments are developing or have in place a local level plan of action but are seeking funding to deliver.	Catchment
	Help to deliver actions within the 20 year Somerset Flood action plan	Somerset
Water Industry	Funding for upstream thinking projects	Catchment
	As included in the statutory business plan including demand management, leakage reduction, network management, phosphate removal, shellfish improvements and chemical investigations	RBD
Agriculture	Campaign for the farmed environment	RBD
	Catchment Sensitive Farming scheme	RBD
Local government	Apply landscape guidelines	RBD
	Ensure delivery of SuDS	RBD
	Deliver flood improvement projects	RBD
	Influence planning applications which impact water quality and quantity	RBD
	Historic environment records available	RBD

Q7 "Do you have any further comments on the consultation?"

A wide range of additional information and comments were received on the consultation. The detailed comments on specific areas and locations have been passed to the local area teams to review. A large number commented that the draft plan complex and difficult to understand. This then hindered your ability to provide useful comments. You would have liked to have seen more detail at a local level on what was going to happen and where.

" ..I found it extremely difficult to find the relevant information for the water bodies I was interested in although the catchment summaries were very useful. Overall, a very frustrating experience which means it was difficult to engage with this extremely important consultation"

Several asked for better engagement tools or a clearer strategy for communicating key messages and making the process more accessible for interested parties.

You would like to see that the river basin management plan is better linked to the flood risk management plan and the marine plans.

A couple of catchment partnerships said that the operational summaries represented a missed opportunity as they could have been a valuable engagement tool.

Consulting in the South West River Basin District

To publicise the consultation on the draft river basin management plan, the Environment Agency made external briefing packs available online, emailed over 100 interested parties, issued a press release and placed an advert in the Western Morning News. In addition to this the consultation was promoted locally through a range of tailored workshops, meetings and bespoke information requests. Local staff attended over 60 meetings or workshops to discuss the consultation and help interpret the information available.

The Environment Agency ran workshops with, or held meetings with or contributed to a range of events with environmental organisations including river and wildlife trusts, catchment partnerships, water companies, local governments, community initiatives and shellfish harvesters. For example Environment Agency staff organised a workshop for the members of the South West River Basin District Liaison Panel, spoke at and attended a catchment based approach/rivers trust event, talked at a bathing waters meeting and arranged a workshop with the shellfish industry. Catchment coordinators spoke to each catchment partnership and attended meetings with local government to discuss how they could input into the consultation and understand the range of documents available. The different types of communication tools used to inform interested parties about the consultation is reflected in the range of responses received, as displayed in the table below.

Sector	Number of responses
Individual	1
Environment management (including NGOs)	9
Farming/land management	6
Government, local	5
Leisure/tourism	1
Manufacturing	1
Transport/navigation	1
Utilities	4
Other	13
Total	41

3.7. Thames River Basin District

Summary of consultation feedback

The Thames River Basin District encompasses four Environment Agency Areas; Hertfordshire & North London, Solent & South Downs, Kent & South London and West Thames. The landscape of these areas includes limestone hills and wide floodplains, from Chilterns chalk to the tidal River Thames and South Essex coastal marshes. Over 15 million people live in the district with water management being one of the biggest challenges facing the river basin district (RBD). Many towns will experience growth, adding further pressure on our water resources in terms of treatment, supplies and ensuring environmental quality. There is a need to find the right balance between the needs of the economy, people, and nature.

Responses were received from a wide cross section of organisations and individuals, including detailed sector responses from water industry, agricultural and wildlife organisations. The majority of response came from environmental Non Governmental Organisations (eNGO's), including Catchment Partnerships, Wildlife and Rivers Trusts.

Responses were varied, from a focus on a single water body to widespread discussion on issues such as the economic appraisal process, measures, classifications, water body boundaries, funding and the Catchment Based Approach; with some respondents answering all the questions and others respondents concentrating on the question that were most applicable to them.

There were a number of specific local issues that have been sent to local area teams and Catchment Co-ordinators for further consideration. Other issues raised will be assessed at a national level to ensure consistency.

The following pages summarise the general themes emerging from an analysis of all the responses and highlights the issues that need to be taken into consideration when planning for the future of the water environment.

A 'Word' summary of the key themes and issues emerging the consultation:

Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

Within the Thames RBD, there were a large percentage of respondents that commented on the proposed changes to inland water bodies or artificial and heavily modified water bodies (A/HMWB) designations and whilst some were broadly supportive of the changes over 50% of respondents had concerns, particularly on the deletion or amalgamation of smaller streams, tributaries and coastal streams. A small number of organisations disputed where particular water bodies began; indicating issues with the maps used for the consultation and others expressed concerns that the maps did not show the lesser tributaries.

A London water-based charity was unable to agree or provide meaningful comment with the proposed changes as they believed boundary changes to transitional and coastal water bodies (TraC) had been made post consultation.

Amongst other issues raised by this charity and mirrored by the majority of London based organisations is that the draft plan highlights the whole of London as a singular management catchment. The unified thinking on this issue is that the delineation does not reflect:

'The huge range of communities which exist throughout London or the complexities of the issues which the rivers face in achieving Good. This highlights that the river basin management plan is largely ineffective for London and will not aid London's rivers in achieving Good to the extent that it should do.'

Whilst many of the London conservation groups recognise the need for a nationally consistent approach to defining water body boundaries and acknowledge the difficulties of integrating the complexity of local drainage, they believe a standard approach to catchment delineation is not appropriate in the context of an urban landscape.

Many found that the justification for making changes has not been articulated well in the document and should have been clearer. An Oxfordshire conservation trust felt that this lack of clarity had undermined the assessment process.

Some local authorities, wildlife & rivers trusts, catchment partnerships and other stakeholders are concerned about the effects of reducing the number of water body boundaries, what it will mean to the monitoring of water bodies in their catchment and how the Environment Agency will now determine whether deterioration has occurred or not. Some felt that the contribution these smaller water bodies can make to the wildlife value of a catchment is being discounted by removing them from classification.

'The water body network is complex and highly variable, and this complexity, subtlety and variety should be recognised within the system and not 'removed'.

Some stakeholders believe that the changes in boundaries and classifications has resulted in smaller water bodies losing their WFD (and hence European) status and also risk being neglected when it comes to designing, implementing and funding restoration projects. Others felt more positive, for example in the Mole catchment, partnerships believed that the changes had a logic to them, reflecting the character of the local environment whilst one water company went as far to say that they,

'Support the proposed changes to water body boundaries and understand that the justification for amendments is to facilitate catchment management and ensure water bodies have uniform characteristics allowing improved targeting of resources'.

Local conservation groups in particular have suggested that any water body review should not just be based on size and length but also on additional criteria such as the level of community involvement and local wildlife value.

On the larger river basin district boundary scale, one local authority (LA), whilst understanding the geographical rationale of the use of river basins as management units, has expressed concerns as this authority is divided between two river basin districts (Anglian and Thames RBDs). They believe that the misalignment of RBD and LA boundaries raises complications in working with local stakeholders, has resource implications and overarching governance issues.

Comments were received from local partnerships about the suitability of HMWB designations for a number of a local water bodies as other, very similar neighbouring water bodies are classified as natural. They wish to see the re-designation of these water bodies so it may be monitored for a wider range of biological indicators as part of WFD assessment methodology.

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

The vast majority of respondents either disagreed or partially disagreed with the draft objectives for water bodies and protected areas. Many commented on supporting the objective to achieve good ecological status/potential over the medium to long term but also believed that achieving these goals were most unlikely without significant resources applied to address the problems.

A number of catchment partnerships and local authorities commented that it was impossible to gauge the level of ambition in the plan or stated that the consultation must be more ambitious and reflect the desire for greater improvements to our natural environments. Some wildlife trusts are concerned that meeting the requirements of WFD will be pushed back to 2027 or further and would like clear confirmation that the overall, long term target of Good Ecological Status/Potential (GES/P) by 2027 still stands.

A local wildlife trust welcomed the translation of Old Building Blocks (OBB) to New Building Blocks (NBB) as a good idea that helps ensure the results are interpreted correctly whilst others have found this confusing and felt it undermines the classification process.

A local catchment partnership made the observation that the “one-out-all-out” approach to classification of status can mask a great deal of progress in moving individual failing elements to good or high status and would like to see more emphasis on elemental improvements as a reflection on how a water body is making progress towards improved status.

Other Wildlife Trusts believe that further assessment or monitoring is required to affirm if the classifications given for certain water bodies are robust enough and respondents from the farming community have questioned whether the Environment Agency evaluation of current status is based on actual investigations or has been implied through modelling and asked for a summary of the breakdown between actual and judgement based classifications.

Organisations with interests in navigation stated that there is very little focus on objectives that will be of benefit to TraC water bodies and others expressed concern that the objectives do not take account of other aspirations for the use of water bodies, such as the restoration or extension of navigation, water transfer or other water-related developments.

For Protected Areas, wildlife trusts could not see in all cases how Biodiversity Action Plan (BAP) priority habitats have been incorporated into the target setting process and that it needs to be made more explicit in the final plan and the farming sector are concerned that Protected Area objectives will be applied to whole water bodies in those instances where only a part of the water body is in a protected area.

Local interest groups and others have expressed real issues with the designation of internationally rare chalk streams and are calling for a national designation to protect all chalk streams. With one catchment partner asking the plan not to dismiss the issue of high levels of nutrients such as phosphorus in chalk streams under the label of technically infeasible and that chalk streams should be aiming for levels of nutrients lower than identified through WFD. And, an organisation from the business sector questioned the realistic chances of some water bodies meeting good for phosphate by 2021, suggesting that cost effective, feasible solutions need to be available before Environment Agency sets targets.

Comments from the water companies have questioned why objectives other than “Good” are proposed to be set at this stage with one company explaining,

‘The consultation is not clear on objectives setting processes; the timeline, the mechanism for subsequent review, and, in particular, the establishment of objectives where data is currently sparse.’

In relation to chemical substances one water company is suggesting that the objectives could change significantly dependant on the outcome of the proposed Chemical Investigation Programme (CIP), particularly where low flow investigations are still ongoing. They go on to quote that *‘Chemical status in general seems poorly defined’* noting that only nine substances have been risk-assessed, and of which three are considered specific pollutants, although one of these (Triclosan) does not yet have an EQS set. They conclude that the setting of objectives appears premature in the absence of a known baseline quality, technical feasibility, affordability etc.

A water supply-only company commented that there is too much emphasis being placed on targets for water quality parameters with only limited reference to water quantity and natural flow, therefore neglecting to acknowledge the duties and responsibilities for ensuring adequacy of public water supplies.

A comment from another water company suggests that if only the water industry sector measures are delivered, overall WFD objectives will not be achieved.

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

Most respondents felt this was not simply a question of a deciding between improving the worst water bodies over maximising water bodies getting to Good, although some felt that we shouldn't lose sight on the European remit of the WFD to achieve GES/P and that this should be the focus of everyone's efforts.

As you would expect from a subjective question there was a range of replies, from those who thought we should tackle the worst first to those that advocated reaching Good Status/ Potential everywhere. The majority however felt that we should base priorities on actions that produce multiple and maximum socio-economic and environmental benefits and ideally these decisions are made locally at the point of delivery and in line with funding allocation.

Organisations and individuals that gave the priority of improving the worst water bodies did so for a number of reasons. One individual suggested that water bodies at 'Bad' status should be unacceptable and subject to legal action and believes that the public would not accept this status if it was publicised more widely. Others suggested that getting the worst water bodies to 'moderate' would be the most desirable as the shared services derived from the water environment are severely reduced in the worst water bodies.

A local rural charity stated that whilst there should be a drive to improve the worst water bodies it should not be at the expense of greater improvements elsewhere. A catchment partnership looking to maximise status improvements, suggests focusing efforts on improving several water bodies from poor to moderate may represent better value than improving a single water body from moderate to good.

Groups interested in TraC water bodies wished to prioritise the improvement of the worst water bodies in a specific catchment, as they felt these waters impact on the attainment of Good Status/Potential of other water bodies downstream and beyond the catchment, stating that *'Urban waterways in poor condition not only impact the rest of the catchment but also people's perceptions of waterways in local areas.'*

And concerns were also voiced, that if maximising the number of water bodies at good status as opposed to improving the worst water bodies is prioritised nationally, rivers in urban areas will attract the least amount of attention and resources for improvement and could *'Weaken catchment partnerships in urban areas significantly'.*

Many organisations and individuals agreed that equal priority should be given to both. In making such decisions, key considerations included the cost-benefit ratio (that should be economically proportionate), the availability of resources and funding, implementing measures which had the highest chances of success and the greatest cost effectiveness regardless of what status category was being targeted. A wildlife trust also felt that interventions that offer the greatest potential improvements to biological and chemical elements for a given investment should be prioritised, regardless of whether this results in an improvement from bad to poor or moderate to good WFD status

Comments from the farming sector said that the focus should not just be on specific status improvements but on important issues such as Protected Areas or those which are highly valued locally. Other trusts and local partnerships echoed this comment in that the priority should be given to Protected Areas, projects with positive Biodiversity 2020 outcomes, and to projects that have good community support. The state of chalk streams was highlighted by some respondents, stating that habitats or species that are of national or global importance should be prioritised and it should be a given that chalk streams attain 'Good' status or higher.

Other comments focused on the wider benefits and opportunities, suggesting that prioritisation of water bodies should follow opportunities as they arise, such as match funding, positive engagement from landowners and collaborative working. Other believed that the cost benefits to health and well-being should be a major factor in prioritising environmental improvement with economic gains coming afterwards.

One wildlife trust considered in order to avoid a last minute scramble to achieve GES in cycle 3, water bodies requiring more actions should be targeted first as their restoration will take that much

longer and another Trust added that *'If current resources do not permit improvement works and monitoring for all water bodies, regardless of status, then shortfall in resources should be highlighted as the reason for failure to meet WFD objective.'*

Q4 "Do you agree the correct measures have been identified?"

Overall the majority of respondents said that they were unable to provide constructive comment as the measures were too broad and lacked sufficient detail. The high level nature of the measures also made it virtually impossible to assess the likely impacts and benefits that may be accredited to the measures.

Many organisations stressed the need for the involvement of a range of environmental organisations in the development of the measures and urged to look beyond current funding mechanisms and identify a more holistic and comprehensive approach to WFD improvements. Other responses suggested that some sectors such as local government and highways had not been fully represented in the delivery of measures or that the draft plan had missed opportunities to identify contributions that could be made to specific issues such as pollution control by sectors such as Highway Agency and Network Rail. One Council commented on the lack of engagement with the local government sector in producing the draft RBMP, and was concerned as they had been identified as a key sector for the delivery of measures.

A response from the water industry sector said that it felt like the draft plan had placed the "Polluter Pays Principle" at the top of the hierarchy for delivering the proposed measures yet suggested there was an imbalance as the emphasis on measures for the Agriculture and Rural Land Management sector was mainly focused on delivering good practice and voluntary measures, which they believe is leading to disproportionate costs and actions for them and other sectors.

Conversely, comments from the agricultural sector stated that there should be a priority towards a non-regulatory approach to measures encouraging voluntary action and industry-led activity through the various agri-environment or payments for ecosystem services type routes; they see further regulation as a last resort. The same sector also expressed concerns on the extent of diffuse pollution that is attributed to the sector and suggests that more detailed monitoring is required to confirm this. One view from the water company sector is that the measures failed to specify a timescale or provide a contingency plan if the voluntary approach to agricultural measures is unsuccessful. However one local Catchment Partnership believes that before doing anything else the levels of phosphates in their river should be addressed first if any other measures are going to have a chance of making any significant affect on improving status.

A number of catchment partnerships were concerned with the trend of short term funding streams to help deliver WFD and that this in turn is restricting them to undertake longer term planning to implement the measures and also their ability to make any real significant impact saying,

'long term strategic funding would enable sustainable projects to really make a difference'

Some of the catchment partnerships were asking for clarity regarding the role the Environment Agency will play in facilitating the progression of the measures, including the type of resource and commitment that the Environment Agency should expect from them when delivering a measure.

One London Trust thought the plan needed to acknowledge major works, such as the proposed Heathrow Airport extension and their potential impact on the river, suggesting that contingencies should be imbedded within the plan to account for these schemes.

One local interest group suggested that Local and Neighbourhood Plans should be required to incorporate stronger policies to protect water bodies from point source and diffuse source pollution and lower tier councils should be required to participate in the WFD process and be funded to do so.

The London Partnerships have expressed a desire to treat litter, particularly plastic within the indicators and measures for WFD as they have evidence to show detrimental effects on saltmarshes. Similarly the partnerships and others have suggested that Sustainable Urban

Drainage (SuD's) and ecologically functioning green spaces which drain into water bodies should also be an indicator and have measures or targets towards achieving them. They say this would align with several Metropolitan policies such as the London Plan, and the All London Green Grid.

A London eNGO believes that for the Thames catchment there is no firm or proven idea in how to achieve good status. They feel that the majority of the issues they face are associated with water quality which at the moment this is not being tackled effectively by the Environment Agency.

A number of respondents made comment that the plan did not give reassurance that the measures would not adversely affect the historic environment.

A common theme amongst the responses was a need to deal with misconnections more effectively at an industry and domestic level and that the term 'diffuse urban pollution' currently encompasses both urban runoff and misconnections problems and would like to see this separated into two distinct considerations as they believe they require distinct actions to address them. The London Partnerships also thought that the issues of urban runoff need far more detailed consideration, saying *'The current source apportionment models which are used to identify sources of pollution are far too broad brush for the complex nature of the urban water cycle. Significant investment is needed into new, more detailed models as well as the gathering of detailed data sets which can be fed into these models'.*

Many groups expressed concern that the measures did not appear to include costs or provision for monitoring, feasibility and project management and that this was short-sighted and led to spending money on projects that are 'quick wins' rather than long term strategic approach.

Views expressed by some representatives from the navigation sector concluded that they could not support the outcome of the Mitigation Measures Assessment because of,

'Fundamental misunderstandings about the use of the mitigation measures approach to defining Good Ecological Potential' and that consultation on these measures *'Has not been carried out consistently, openly and in consultation in many of the catchments'.*

Some local interest groups thought the measures gave too much emphasis on meeting the objectives of the WFD and not on what is right for the river itself including not being explicit enough within the draft plan on identifying engagement with local communities and other local stakeholders to help achieve the measures. The need to integrate actions from local catchment plans was also borne out in the responses.

When looking at the measures and prioritising WFD-related projects some London groups highlighted the need to recognise multiple benefits to include those to terrestrial biodiversity and habitat connectivity, flood risk management benefits and other Ecosystem Services

Comments from the woodland sector expressed concerns that in some areas there has been a complete lack of knowledge regarding the role that woods and trees can play in improving the ecology of water bodies and are really concerned that they will be overlooked as potential measures in many catchments.

One council stressed (as a responsible Local Lead Flood Authority (LLFA) that when highlighting measures such as the removal and modification of engineering structures that there needs to be some clarification in the plan in terms of whose assets the consultation documents are referring to and whether compensation may be available as a result of the measures implemented.

Many of the respondents commented on specific types of measures or provided suggestions for improvements or alternative approaches:

- *'Less reliance should be placed upon groundwater sources in the medium term, and targets should be identified to replace aquifer abstraction by surface supply and storage'*
- *'An additional levy upon developers to provide funding for a proportion of the improvements required to enable water bodies to achieve Good Status according to the (local) catchment plan and in the case of reducing water demand, it should be made a prerequisite that substantive water harvesting technology be incorporated into all new properties'*

- *‘There are no measures identified to reduce the impact of urban runoff to receiving waters from a flooding point of view. Urban runoff can also cause other impacts beyond flooding and pollution (impact on chalk streams)’.*
- *‘Better use of SUD's schemes and changes to the planning process needed to ensure their use’*
- *‘Measures proposed which focus on improving modified habitats and managing invasive non-native species frequently do not correspond with the reasons for not achieving good status’*
- *‘More alignment with the Marine Strategy Framework Directive (measures) would be beneficial for TraC waters’*
- *‘It appears that there are insufficient measures proposed for the rural land management sector. In particular, we are concerned about absence of measures to protect drinking water sources from diffuse pollution from agriculture, potentially compromising this statutory requirement of the Directive’.*
- *‘Within the measures which address barriers to fish movement and management of engineering structures there is significant concern about the term removal, which could lead to increased migration of invasive species upstream’.*
- *‘Abstraction is an issue that needs stronger action with penalties for over-abstraction and wasting water if the overall importance is to come to the public’s attention’.*
- *‘The measures (for London) do not include any reference to habitat management of restoration projects’.*

Q5 "Do you agree with the way the economic appraisal process has been done?"

A large percentage of respondents found this question difficult to answer or would not comment. It was said that the economic data was inaccessible and that the whole appraisal lacked transparency. There was also confusion when answering this question between commenting on the economic appraisal (cost benefit analysis) and the economic assessment (impact assessment).

One London Trust thought that this was a good start to help recognise benefits to society. They expressed that the information is useful to the voluntary sector and other organisations as it could be a useful tool to help attract funding although they did suggest that costs associated with community engagement must be included in the appraisal and not valued as 'day job'. They also commented on the bundles saying that it may help prioritise which bundles of measures will be of the most benefit to society and of the highest importance.

In terms of protecting specific habitats local conservation groups were concerned that the value of chalk rivers has not been given sufficient weight within the appraisal process and that the Environment Agency has not been ambitious enough in ensuring no deterioration and maintaining protected areas.

Many respondents commented on the use of benefits, ecosystem services and the methodologies for assessment. With regard to the use of National Water Environment Benefit Survey (NWEBS) one wildlife trust suggested that, if the impact of litter had been used it would have adjusted peoples willingness to pay values, claiming that they have evidence that people and communities are not willing to pay the amount they have said for a river which has a Good WFD status but is nevertheless littered. Water companies and councils have also questioned the effectiveness of using the NWEBS methodology.

It was recognised by one Trust that some benefits are not easily quantified, or may not be as directly beneficial to people as others and one council thought that the benefits presented were a very rough estimate.

Comments from the farming sector had questioned the benefits values asking to see further evidence for some of the values used, especially where they have been developed for a particular location or scheme and used to inform possible benefits for a location or project in another part of the country. They also found it to be unclear on how costs have been apportioned between agriculture and other rural land management and questioned how they had been derived (other than from generic figures), and how much uncertainty there was in the data.

One council referred to specific ecosystem services and believed that the estimations undervalued the cumulative value of soil formation, carbon storage, flood storage, water purification, wellbeing and cultural benefits. Another council suggested that a reduction in 'flood risk' should be considered as an ecosystem benefit of sustainable water management and that the category of 'cultural and quality of life benefits' should include the negative consequences of flooding such as its emotional, medical, psychological and social knock-on effect on its victims especially considering the effects of climate change on the magnitude and frequency of future floods.

A number of catchment partnerships thought that the bundles of measures had mostly ignored small scale projects that it did not take into account the benefits SuD's projects can provide and that local and national planning processes had failed to take into account the water environment when considering ecosystem services.

Q6 "What measures can you deliver to help achieve the long term objectives?

Over 80% of respondents provided a description of their organisations current or proposed projects, and how they had been working with others on a plethora of projects and innovative initiatives. Examples of actions being undertaken from across all sectors include:

Sector	Measures proposed	Location
Environment Management (including NGO's & Catchment Partnerships)		
	Working with farmers to make aware and manage diffuse pollution	Catchment
	Working with others on water efficiency measures to reduce water consumption	Catchment
	Installation of reedbeds	Catchment
	Provide practical advice and Information on the risks of pollution from septic tanks	Catchment
	Installation, management and advice of SuDS	RBD
	Rainwater harvesting	Catchment
	Street drain signage	Catchment
	Public engagement programmes - education on pollution awareness.	RBD
	Tree management	RBD
	Woody debris installation	RBD
	Creation of backwaters	Catchment
	Numerous projects to involve voluntary action through labour on water environment projects	RBD

	Programme of river restoration and channel rehabilitation schemes,	RBD
	WFD planning and collaborative working	RBD
	Monitoring river levels	Catchment
	Community-led water quality testing, pollution and waste monitoring	Catchment
	Benefit realisation projects with Local Authorities	Catchment
	Ecological surveys and monitoring to inform river and wetland management and restoration works	Catchment
	Reducing sediment pathways	Catchment
	Deculverting works	Catchment
	Weir removal	Catchment
	Fish and eel passage easement and installation	Catchment
	Identifying misconnections and mapping out the drainage network	RBD
	Mink control programme and reintroduction of water voles	Catchment
	Citizen science projects	RBD
	Monitor and report on the effectiveness of measures implemented and critical post project habitat management	Catchment
	Raising awareness of the importance of chalk streams and the need to conserve them	RBD
	Catchment Action Plans - most catchments are developing or have in place a local level plan of action and many are linked in with other strategic plan initiatives.	RBD
Water Industry	Reducing customer demand for water through measures such as our compulsory metering and water efficiency programmes.	RBD
	As included in the statutory business plan including demand management, leakage reduction, network management, phosphate removal and chemical investigations.	RBD
	Restoring Sustainable Abstraction, National Environment Programme and Safeguard Zone Action Plans.	RBD
Agriculture	Catchment Sensitive Farming scheme	RBD
	Promoting best practice through all the voluntary initiative programmes –e.g. Campaign for the Farmed Environment, the Voluntary Initiative and Tried & Tested	RBD
	Continue to promote awareness of the issues through publications and members meetings	RBD
Local Government	Ensure delivery of SuDS	RBD

	Deliver flood improvement projects	RBD
	Promote the delivery of strategic green infrastructure through its membership of Local Nature Partnerships and also through the spatial planning system	RBD
	Support and engage with local Catchment Partnerships, statutory organisations and the private sector	RBD
	Influencing developers and Planning Authorities to consider improvements to the water environment	RBD
	Encourage natural groundwater recharge	RBD
	Water efficiency measures	RBD
	Use of Voluntary Initiative registered weed control contractors.	RBD
	Identifying opportunities for Improvements to the water environment through responsibilities as the LLFA	RBD
Navigation/Transport	Work with EA and others to make water body assessments more easier to understand by operators	RBD

There was a strong voice of opinion amongst Catchment Partnerships and eNGOs that whilst a lot of good work was being done to help achieve WFD objectives it could be severely hampered if funding does not continue to support delivery of the measures and the partners that help to make it happen. It was also noted that the objectives could be achieved more efficiently if larger, long term project funding is made available rather than taking the current, piecemeal year by year approach.

Another common theme amongst the responses was that there was too much reliance on third sector organisations to deliver WFD objectives whilst emphasis should be on developing the staff and resources required amongst organisations with a statutory responsibility for the delivery of this directive.

For many local authorities there was a desire to help promote and deliver objectives towards the water environment through whatever means they can, however nearly all councils said that they have very limited resources and would be unable to deliver many of the proposed measures/actions with one council quoting that money spent on the water environment *'remains a low priority'.*

The majority of councils also discussed their ability to deliver SuD's schemes but explained that changes to delivering sustainable drainage through the planning process, may now be more of a challenge and that government expectations on implementing SuDS should be noted and not taken as to be adopted in all situations.

Other councils feel that as LLFA's they may be able to influence developers and planning authorities in considering improvements to the water environment and that delivery by the LLFA may offer further opportunities to deliver the objectives for both surface and groundwater bodies.

One individual commented on the use of universities as a major source of energy and expertise to help with data gathering, analysis and research and that as a member of a local catchment group they would be using this route to help with some of their initiatives.

Nearly all welcomed the opportunities to engage with Environment Agency, local authorities, catchment partnerships and the local community to help deliver projects.

Q7 "Do you have any further comments on this consultation?"

There was an overwhelming negative response on the nature of the consultation material, data presentation and its accessibility. There were strong messages that the documents were too lengthy and did not convey the information needed to answer the consultation questions and that the language used throughout the consultation was prohibitive and not easily understood.

It was felt that the lack of complete and comparable data sets, and detail on proposed measures at water body level made it impossible to determine whether there had been improvements over the life of the first cycle of the RBMP. With one local MP stating *'I believe that deciphering the information provided in order to respond to this consultation has been incredibly difficult and this will have deterred people from responding. Future consultations must be more straightforward.'*

Many commented on the Catchment Data Explorer (CDE) tool saying that it was very useful but others found the failure to make measures information available via CDE had further exacerbated the problems of responding in a meaningful manner.

Others found that in many cases there still remains a large gap in the plan with regard to information and data on transitional and particularly coastal water bodies.

Many respondents congratulated the Catchment Coordinators for their help and also for the many workshops held by the Catchment Coordinators which had been very useful in making sense of the consultation and responding to it. However, London groups believe that much more effort should have been made by the Environment Agency to support co-ordination for eNGOs and community groups in London given that the Thames RBMP includes eight catchments within its 'London management catchment' as well as the Colne, Ingrebourne, Beam & Roding, and Cray and Darenth. They also suggested that more power should be devolved to the catchment partnerships in the London Catchment Group and the views of this collective should be accorded higher significance within the Thames River Basin Management Plan.

A wildlife trust also acknowledged that a considerable amount of effort has been put into the process, particularly the cost benefit analysis, and acknowledged the complexity of the tasks involved.

A response from the agriculture sector said that the Plan was not suitable for engaging the sector, and that a strategy for communicating WFD messages and making information accessible is needed, stating,

'There needs to be strategic engagement with Government and other stakeholders to ensure better co-ordination of messaging at a catchment scale'.

There was much comment on the erosion of funding from government threatening the Environment Agency's ability to discharge its regulatory duties and contribute effectively to the delivery of the long term objectives proposed in this consultation and that there should be less of a reliance on third sector organisations to deliver the WFD objectives, with one local group saying *'We are dealing here with water which is a necessity of life, an amenity and also vital to good ecological environment. Therefore the needs of the EA to do a good job should not be limited'.*

Others were concerned that after all this planning would any realistic amounts of money be available to deliver the measures with one person suggesting that the current river basin planning cycles are too short and should be extended to 10 year cycles.

The combining of strategic plans was referenced several times in particular greater links between RBMP and Flood Risk Management Plans, Local Flood Risk Management Strategies, Fisheries Strategies, Biodiversity 2020 targets, and Marine Strategy Frameworks. With one Trust suggesting that it would also help greatly to achieve more effective outcomes for WFD if water company business planning cycles were aligned with WFD planning cycles.

Some felt that the effects of climate change had been dealt with in a very cursory manner and although there was mention of some positive work going on to mitigate this, they could find no plans for using the results of these to be rolled out across the catchment. Others commented that they welcomed the fact that the reality of climate change is recognised in the documents.

A council suggested having an appendix in the plan with a list of stakeholders, public, private and voluntary for each catchment, a go to list of organisations and individuals so that they can better coordinate efforts, remove duplication and partner on local and wider catchment ideas, projects and initiatives.

One water company offered an alternative approach to communicating the plan, by suggesting tailoring consultation material for different audiences and sectors based on their role and responsibilities in developing and delivering the plan and suggesting the use of more innovative communication techniques to make the consultation more inclusive as the current format is likely to discourage engagement with wider audiences not directly associated with environmental planning.

Consulting in the Thames River Basin District

To publicise the consultation, external briefing packs were made available on the Environment Agency website and the launch emailed to over 100 interested parties. A press release was issued and an advert placed in the Oxford Mail and London Gazette.

Local Environment Agency staff, mainly led by Catchment Coordinators, attended over 50 meetings or workshops to discuss the consultation and help interpret the information and range of documents available. Many environmental organisations attended these events for example, river and wildlife trusts, catchment partnerships, water companies, local government, community river groups and interested individuals. Types of events attended including a workshop for the members of the Thames River Basin District Liaison Panel, a joint water company meeting to provide information to help engage further and respond to the consultation, promotion of the draft plan and encouraged response at the National River Fly Conference and engaged with local authorities through events such as Urban Design London and a number of London based workshops.

Over 200 briefings were sent via email to local Members of Parliament, local authority chief executives, Transport for London, residents groups, London Councils and other interested stakeholders. Newsletters on the consultation were included as part of the delegate pack at the Thames Estuary Partnership multi-sector event.

The consultation for the draft Flood Risk Management Plan was discussed and delegates encouraged to respond at over 50% of the dRBMP events.

Tweets were sent out to ask people to have their say on the draft plan and reminders sent 4 weeks before consultation end. Hard copies of the draft plan and associated documents were also made available at Environment Agency offices and a number of requests came in directly for electronic, CD and hard copies of the plan to be posted out. Email requests for further data and information were also provided throughout the six month consultation period.

The different types of communication tools used to inform interested parties about the consultation is reflected in the range of responses we received back, as displayed in the table below:

Feedback came from the following groups:

Sector	Number of responses
Individual	8
Business/commerce	1
Environment management (including NGOs)	29
Farming/land management	2
Government, local	13

Government, national	1
Transport/navigation	2
Utilities	3
Other	27
Total	86

3.8. Severn River Basin District

The Environment Agency leads on the Severn River Basin District and as a cross border plan, works collaboratively with Natural Resources Wales to ensure arrangements are in place for planning and managing this River Basin District.

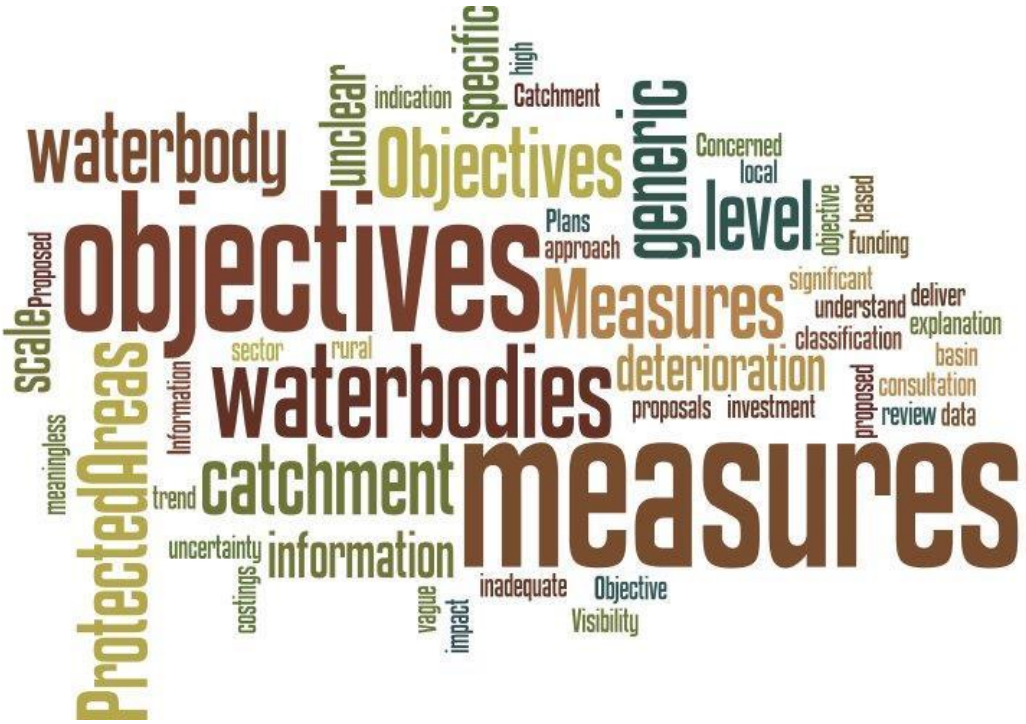
The plan will be updated in 2015, then submitted for approval by government and sign off by the Secretary of State and Welsh Ministers.

Summary of consultation feedback

The Severn River Basin District covers a large area from the uplands of Wales, through England to the Severn estuary. The River Severn itself stretches for 350km. The main tributaries are the Warwickshire Avon, Teme, and Bristol Avon in England, and the Wye, Usk and Taff in Wales.

Overall, 47 responses were received from a wide range of organisations, groups and individuals. Responses varied from single issues to widespread discussion of the plan with some respondents answering all the questions and others focussing on specific question(s). In general, there was support for the proposed catchment changes, but many felt that the objectives lacked short term ambition, and the measures were too generic. Some also noted the lack of emphasis on coasts and estuaries. There was widespread criticism of the complexity of the consultation documents and the supporting datasets, which made it difficult to respond.

All the responses have been read, and this report summarises the main points raised. Some responses included a high level of detail which has been passed to the relevant local area teams to inform local river basin planning. The wordle below illustrates some of the key themes that were raised in the responses.



Q1 "Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designations?"

There was overall agreement to the proposed boundary change between the Severn and the South West River Basin Districts with the Brue and Axe operational catchment moving into the South West River Basin District. A single concern was raised about this in relation to managing the adjacent estuarine coastal waters which will stay in the Severn River Basin District.

Some responses proposed that the whole Bristol Avon management catchment be moved from the Severn into the South West River Basin District to assist with day to day management and delivery of the WFD. Some of you also commented that the Bristol Avon shouldn't be divided into urban and rural operational catchments as this is not an integrated catchment approach.

In relation to water body boundaries, many of you found it hard to provide informed comments as it was difficult to identify the changes made and their impact. You also raised the following concerns:

- Loss of the unique value of headwater streams;
- SSSI ditches could receive less scrutiny than in cycle 1;
- Lack of understanding on the implications for water bodies such as the Lower Usk and Wye that have become coastal catchments and what impact this will have on the Severn estuary which has SAC and SPA designations;
- A reduction in monitoring;
- Some projects may lose out on funding if water bodies are non-reportable.

The water industry *said 'regulators should avoid removing any water bodies which may be within the finalised water industry National Environment Programme with a WFD driver; otherwise it will be hard to argue that our sector should make the investment'*. One organisation proposed a *'sub water body'* approach in urban areas comprising many small scale watercourses to better target specific actions.

In terms of the changes to artificial and heavily modified water body designations, you had concerns about whether these had been done consistently, and the resulting impact on the mitigation measures assessment. We received several suggestions from the agricultural and water industry sectors on water bodies that should be re-designated as heavily modified. One comment suggested that all feeder channels should be absorbed into the artificial/heavily modified water body that they serve.

Q2 "Do you agree with the objectives proposed for water bodies and protected areas?"

People mainly agreed or partially agreed with the proposed objectives, this was qualified with specific points. Many of you told us that:

- It was hard to find information about objectives at water body level, or understand how they had been set;
- It was not clear which water bodies are expected to meet good ecological status (GES) by 2021, 2027 or longer.
- It was difficult to get the appropriate level of detail from the consultation materials or it differed to the information on Catchment Data Explorer.

A wide range of additional points were also made. The target of achieving 83% GES by 2027 was queried. Responders asked what this meant in relation to the revised standards for metals. One responder believed 83% GES is not ambitious enough, whereas another approach sought a minimum objective of moderate for all water bodies to indicate an intention to improve all catchments.

There was a call for consistency across water body objectives and protected areas, as it was felt that differing standards and timescales could fail to safeguard Special Areas of Conservation. The water industry claimed that drinking water protected areas are not given the same status as other protected areas.

There were differing views on how action to meet objectives should be funded, and deciding what is affordable. Some stated more evidence needs to be gathered to justify the cost-benefit ratio of action beyond 2021. Linked to this some of you had concerns about the quality of the information used, so could not agree to the objective, adding that this would hinder decisions on what is affordable.

The water industry raised concerns that there was a disproportionate burden upon them and their customers to fund improvements.

A number of responders connected the proposed objectives with the current classification, describing water bodies where they disagreed that the status had improved. Similarly there were concerns about water bodies that have deteriorated, stressing that more action is needed.

With reference to groundwater, one response stated that using current data to establish baseline conditions was invalid, as it would not be representative of historic conditions across all abstractions.

Q3 "Where flexibility exists, should the priority be maximising the number of water bodies at good status or improving the worst water bodies?"

A broad range of responses was received, including quotes such as *'Choices are not black and white'* and *'This is a difficult question to answer!'* A catchment approach was advocated by many, with a mix of objectives set for individual operational catchments, so that some catchments focus on improving the worst water bodies and others maximise the number of water bodies at good

status. In Wales there is concern that there has been no consultation with the private sector on the move towards a natural resource management approach.

Analysis of your responses gave the following ranking of priorities:

1) Give priority to outcomes that result in the most benefits, including delivery of wider benefits such as ecosystem services and community engagement;

2=) Target the worst water bodies/ improve all water bodies to an acceptable level. The rationale given by one response was that:

'Improving the status of water bodies is a slow and expensive business. Thus improving the worst water bodies is a better and more sustainable aim, rather than concentrating on the quick wins. This approach is also more obvious, popular and inspiring for the taxpaying public as changes are more noticeable'.

2=) Target statutory/ protected areas/ sites of national/ international importance/the most important/ valued water bodies

3) Maximise the number of water bodies at 'Good' status

4) Quick wins (regardless of status)

Several responses highlighted a preference to target upstream water bodies for downstream improvement, and to focus effort in areas where collaborative actions could be delivered through a wide range of stakeholders. This maximises investment and enables more failing elements to be addressed. You also mentioned that measures should be evidence based to address the reasons for failure, be effective and efficient and give value for money. One response said the polluter should pay in the worst water bodies, and there was support for accurate, evidence based source apportionment to identify the relevant measures to address sector contributions.

Q4 "Do you agree the correct measures have been identified?"

Most of you agreed or partially agreed that the correct measures have been identified. However, many felt unable to comment in a meaningful way because the measures information provided was too generic and lacked water body level detail. There were particular problems with finding information on transitional and coastal water bodies. Lack of resources for delivering measures was highlighted as an issue.

Many of you identified a lack of clarity on:

- the link between reasons for not achieving good status and measures (to ensure that the evidence for investment was sound);
- measure effectiveness, especially as there is no review of those from cycle 1;
- timescales for delivery of the (national and local) measures;
- who will deliver the measures.

Several of you thought that integration with the Flood Risk Management Plans would bring multiple benefits. One response suggested merging some other plans such as Nutrient Management, Site Improvement and River Restoration to save money.

Some of you pointed out inconsistencies in the information provided, had queries or made suggestions on how to improve the plan. These have been forwarded to the most relevant person to inform the final plan or reply back to you, as appropriate.

The navigation sector highlighted particular issues with the proposed mitigation measures for artificial/heavily modified water bodies, which were not available until late in the process. The main concerns were that the assessments have not been carried out consistently (including between England and Wales) openly, or in consultation. They thought that unless this could be rectified quickly, these measures and their associated objectives should not be included in the final plan.

You told us that the plan lacks ambition for non-water industry sectors, and that the principles of 'polluter pays' were not in effect. Many of you would like effective and binding measures developed and enforced to ensure that all sectors contribute. Others support advice-led regulation to encourage good practice.

Several responses highlighted an apparent disparity of approach between the agriculture sector and the water industry. You told us that there appears to be an expectation that the water industry will only take action where costs can be passed on to customers, whereas farmers cannot do this. Agricultural measures must be evidence based and proportionate so that the profitability of this sector is not compromised.

Views on the proposed agricultural measures were mixed. Many of you think that there is an over-reliance on ineffective voluntary measures and that there should be stronger legislation, cross-compliance conditions and enforcement. One response from the Welsh part of the Severn River Basin District thought the addition of general binding rules would be useful.

The agricultural sector said targeted implementation of the right measures will be more successful in reducing agricultural pollution than a standardised approach. They oppose measures that increase regulation where there is no scientific justification and the introduction of general binding rules. Forcing farmers to take action through regulation will result in the bare minimum level of action. They support revising the "Clearing the Waters" guidance for dredging in coastal and estuarine waters, and suggest it should be expanded to rivers to alleviate flood risk and loss of productive agricultural land.

Several responses from outside the agricultural sector said engaging farmers as partners will pay greater dividends and that the benefits of voluntary approaches for agriculture should be acknowledged. Others stated that many farmers are willing to undertake actions, but need technical support and that clear communication and engagement is essential for this.

You also told us that there is a perception amongst the farming community that they are incorrectly blamed for many water quality problems as sources such as road runoff, septic tanks, drainage and sewer misconnections also play an important role.

The water companies support the use of safeguard zones and nitrate vulnerable zones, however one pointed out that the priority areas for new agri- environment schemes do not coincide with these.

In terms of who is involved, you thought that local authorities could do more. Several of you think there is a bigger role for the third sector via a 'grassroots' approach. This has the potential to engage community groups and influence practices locally.

Many of you agreed that the catchment approach is the most effective mechanism for delivery of the plan but were concerned about the lack of transparency and consistency in catchment plans. You said these should be directed by the strategic river basin plans and reasons for not achieving good rather than other priorities.

One response suggested a systematic 'source to estuary' approach, where benefits can be maximised by tackling the top end of river catchments first. A couple of responses suggested a co-dependency approach for maximising the number of water bodies at good status by co-ordinating catchment actions across sectors to maximise investment and benefits, rather than sectors acting in isolation.

One response highlighted a nationwide failure of catchment plans to properly integrate transitional and coastal waters like the Severn estuary. You said that 'Going forward issues relating to the catchment management approach need to be addressed by the Environment Agency and Natural Resources Wales together in this cross border site.'

Several of you made comments in relation to 'Changes to natural flows and abstraction'. One of the water companies stated that low flow problems can be addressed using flow augmentation and hydromorphology type solutions, which are more cost effective than reducing abstraction and developing new sources. Another water company said that if changes to abstraction licences are proposed (especially for public water supply) there must be sufficient evidence of the impacts and evaluation of all costs before any permanent changes are made.

There was a call for trickle irrigation to be brought into the regulatory system in 2015, and another respondent noted that there is no mention of the potential 'gains' in water from restoring the hydrological function of catchments, for example by restoring the function of peat and de-compacting agricultural soils.

Some farmers are concerned that agricultural water use may be 'subordinated' to public supply due to climate change and/or habitat requirements. Given on-going large scale leakage losses by water companies and non-essential uses by domestic water consumers, they question this and think that food security and domestic food production should be a higher priority.

Other key points you made were:

- the need for WFD obligations to be prioritised in fisheries work, particularly enforcing regulation that requires owners to ensure fish passage;
- the need for more effort to eliminate invasive non-native species;
- the need for sustainable land management and better protection of soils for both food and water security.
- your support for green infrastructure;
- the need for enhancement of biodiversity;
- Measures should help mitigate and adapt to the impacts of climate change.

You questioned how bathing waters measures will be managed and enforced and said that more than a voluntary code is needed.

Q5 "Do you agree with the way the economic appraisal process has been done?"

Most respondents did not answer this. Those that did either partially agreed or disagreed with the way the economics appraisal had been carried out.

Several responses said that the work was unclear, difficult to understand and that there was little explanation of how figures were generated. For example, although it demonstrates that benefits outweighed costs, it was not clear what that means in real terms and whether money will be invested effectively and transparently for the greatest benefit to society. The 37 year time frame for the analysis was questioned as full benefits may take longer to achieve, yet investment costs can't be spread over such a time. This also scales back the ambition to achieve good status by 2027. You said the final appraisal reports lacked the detail needed for targeting funding across the Severn River Basin District.

The ports sector thought that the assessment of their potential costs were inadequate. Another respondent requested that the proposed impact assessment be made available for comment prior to submission to ministers.

One of the catchment partnerships said the lack of engagement during this work precluded inclusion of local knowledge and expertise. Such engagement should have been undertaken earlier and not via the consultation which has only offered the chance to comment on generic measures and their associated cost benefits. It was felt that the national and river basin assessments had been done independently.

Some said the different approaches taken by the Environment Agency and Natural Resources Wales made it difficult to compare different versions of the same information - 'this causes confusion, giving the impression that Natural Resource Wales and the Environment Agency are working within their silos over a critical part of the future success of the plan'.

Water companies and catchment partnerships both raised concerns over the bundling of measures particularly uncertainty about which measures and data had been used and that some measures would be cross subsidising others. Despite this, one water company stated that the approach was pragmatic.

The water industry had three clear messages on the scenarios presented:

- Concern that the European Commission will consider 37% of water bodies at good status by 2021 as stated in scenario 5 as being inadequate leaving too much work for cycle 3;
- Concern that most scenario 5 costs are for the water industry (approximately three quarters) yet agriculture also contributes significantly to the failures. This was thought to be unfair on consumers and leaves governments exposed to infraction for being at odds with ministerial guidance. This states that Natural Resources Wales and the Environment Agency should, “seek to be even handed across different sectors of society and sectors of industry”.
- The potentially significant costs of preventing deterioration or meeting protected area needs were not included. These must be set out as they will affect the affordability of achieving the stated objectives by 2021 or 2027.

The agricultural sector expressed concern that the additional cost burden of measures on them and possible impacts on food production had not been identified. This is illustrated by the difference in their costs between scenarios 4 and 5, which shows a 65 fold increase to £6.5 billion. One water company questioned whether this was realistic. The agricultural sector said not enough detail was presented to understand the impact upon working practices. One water company wondered whether changes in agricultural technology had been accounted for.

Comments from other sectors on the scenarios included:

- Have the scenarios been peer reviewed?
- As indicated in scenario 5, the exclusion of catchment restoration fund investment beyond 2016 was criticised;
- Scenario 5 may underestimate funding from the corporate sector, including food retailers;
- The scenarios have helped stakeholders make informed comparisons of the cost required and benefits achieved, in different situations.

Whilst one of the catchment partnerships agreed that protected sites should be afforded greater protection and therefore finance, they strongly urged that the funding is not siphoned off to these areas alone. Other respondents agreed that measures targeted at protected areas would deliver positive societal benefits.

One water company thought that the number of improvements deemed cost-beneficial were much greater than in previous analyses by the Environment Agency, UK Water Industry Research (UKWIR) and water companies and that further work is needed to build a consensus of understanding. Despite this, it was noted that some cost benefit ratios are very low and further work was called for to demonstrate a positive benefit in terms of ecosystem services.

One sector said some economic details behind the measures are incorrect and consequently objectives may not be cost-beneficial and should not be committed to.

A water company strongly supported the UKWIR RG08 project recommendations and that disproportionate cost assessment should be applied at the water body scale, in line with measures and objectives.

Water companies voiced concerns over the use of environmental flow indicators (EFI) in scenario 3 for estimating the scale (and cost to resolve) of abstraction related flow issues. They thought that they were not an appropriate measure for applying permanent changes to abstractions as they skew cost benefits. Also, the EFIs are not used for heavily modified water bodies which make up a large proportion of abstraction and flow related failures.

The catchment partnerships made the following points:

- The plan should specify how it will be delivered;
- The imbalance in the application of regulations and their enforcement needs to be resolved;
- In Wales, sufficient money has already been identified to correct the issues arising from agriculture, provided it is properly targeted;

- There was welcome recognition (in the catchment summaries) that there will be ecosystem service benefits from third party delivery and that this provides qualitative 'weight of evidence' for the economic appraisal;
- Too much emphasis is placed on projects undertaken by statutory authorities and agencies with no consideration for others, such as charities, which can give better value for money;
- Excluding monetised values of services within the analysis is a missed opportunity to show successive governments the true value of catchment and ecosystem service improvements.

Q6 "What measures can you deliver to help achieve the long term objectives?

The consultation responses provided lots of information about local action to improve the water environment. Summarised below are the projects where people indicated that action would take place over the next 6 years. The Environment Agency also received information about projects that had already been completed, or ideas for projects that could occur pending funding being secured. All of this information has been shared with local Environment Agency and Natural Resources Wales staff.

Sector	Measures proposed	Location
eNGOs	Woodland creation to benefit the water environment	River basin district
	Invasive non-native species control	River basin district
	Community engagement and voluntary action	Catchment
	Increase public awareness	Catchment
	Advice to land managers and farming	River basin district
	Participate in catchment partnerships	Catchment
	Fish passage improvements	River basin district
	Habitat protection and enhancement	River basin district
Navigation	Managing abstraction and flows	Catchment
	Develop local programme of measures with the Environment Agency.	Catchment and coastal waters
	Habitat improvement	Catchment
	Fish and eel passage improvements	Catchment
	Improve sector engagement	River basin district
Catchment Partnerships	Developing catchment plans through partnership working	Catchment
	Landowner advice and capital works	Catchment
	Environmental monitoring	Catchment
	Habitat management	Catchment
	Opening green spaces for people	Catchment

	Physical improvements	Catchment
Water Industry	Provision of data and modelling information	Catchment
	Aligning activities with Local Nature Partnerships	Catchment
	Biodiversity improvements	Catchment
	Developing partnership working	Catchment
	Integrated catchment plans	Catchment
Agriculture	Support to DEFRA on targeting advice and grants, developing success measures, and reporting progress.	English catchments
Local government	Promotion of green infrastructure through Local Nature Partnership and influencing spatial planning	Catchment
	Planning policies take water environment into account	Catchment
	Consideration of additional polices and guidance to protect the water environment	Catchment
Conservation board / AONB	Catchment based advice and guidance	Catchment
Individuals	Contributing local knowledge and voluntary action	Catchment
	Environmental monitoring	Catchment

Q7 "Do you have any further comments on this consultation?"

Many of you said the draft plan was complex, difficult to understand and too high level, and found it difficult to provide constructive comments. You felt the supporting information was inconsistent, and lacked detail. You found it particularly difficult to find information on artificial/heavily modified water bodies, and thought there was a shortage of target figures in the plan.

Several responses highlighted a lack of consideration for cross border working. You would like to see better links between England and Wales, particularly in the cross border catchments. You didn't know which consultation to respond to, which objectives applied where and were confused by some of the catchment summaries for the Severn River Basin District being hosted on Natural Resources Wales' website.

A number of responses highlighted the fragmentation of information for the Severn estuary, which is also cross border. You were disappointed that there wasn't a catchment summary for the estuary and reporting differences between England and Wales added to the inconsistencies.

The following comments were made on data and evidence:

- You had concerns about an apparent shift away from ecological monitoring in Natural Resources Wales;
- You thought that third sector data and evidence must play a role in improving the understanding of our water bodies;
- Classification changes resulting from new assessment tools or more stringent standards must be distinguished from 'true' status changes.

Some of you had detected a welcome change in the direction of the Severn Liaison Panel and hope this signals a more collaborative approach in future. You would like the final plan to be shared with, and ideally endorsed by, the Severn Liaison Panel before it is submitted to ministers.

Several other points were raised including:

- You were pleased to see a more integrated approach to catchment management in Wales, but had concerns over long term funding;
- You made detailed comments on technical feasibility and the proposed definition of significant adverse impact on use;
- You thought that more regulation is needed to improve protected areas;
- You are concerned about enforcing measures via consent conditions;
- You said that discussions at a local level must involve all stakeholders;
- Water Watch Wales should be developed to accommodate more information;
- You would like to see consideration of tidal lagoons in the final plan.

Consulting in the Severn River Basin District

Engagement in the Severn River Basin District was planned and led by Environment Agency catchment co-ordinators across the Midlands and South West in partnership with colleagues in Natural Resources Wales. There was some local co-ordination of engagement on the draft river basin management plan and the draft flood risk management plan. This helped raise awareness of the links between them.

The Environment Agency and Natural Resources Wales built on the relationships and preferred ways of working that were established during the 'Challenges and choices' consultation of 2013. The Severn Liaison Panel received targeted briefings, updates and a workshop to identify strategic priorities. Many catchment partnerships held workshops involving detailed, local discussions with the Environment Agency and Natural Resources Wales, to bring their detailed knowledge of local priorities and links into community and third sector groups.

Environment Agency and Natural Resources Wales staff were informed via internal communications such as webinars, newsletter updates and targeted briefings. They were also provided with generic communications relating to the consultation and encouraged to share this information in partner meetings. The majority of engagement with stakeholders was face to face, largely through meetings. Other forms of communication included:

- Statutory public notices in the Worcester News, Western Morning News and references to the Severn consultation in the (Welsh) Western Mail in October 2014
- Four press releases launching the consultation and a reminder one month before the close of the consultation. Coverage included the Worcester News, Shropshire Star, Ludlow Advertiser, Hereford Times and the e-zine AgriBuzz for farmers and landowners
- E-mails about the consultation to 228 stakeholders in the Severn River Basin District from Chief Executive Paul Leinster and a reminder in March 2015. The Principal Account Officer for the Severn River Basin District also emailed all stakeholders two weeks before the end of the consultation.
- Social media comprising of 8 tweets to over 13,000 followers. Some 20 re-tweets reached a further 7000 followers potentially engaged in water quality issues.
- There was also a wide range of communications and engagement at a national level across both England and Wales, which included the National Liaison Panel for England and Welsh Government Stakeholder Forum.

The table below provides details of the local engagement activities carried out.

Date	Type of event	Stakeholders involved
23 and 30 September 2014	Stakeholder workshops on the current Severn RBMP and forthcoming consultations	Warwickshire Avon catchment partners

6 October 2015	Liaison meeting with Lead Local Flood Authorities	Local government members of Lead Local Flood Authorities in Shropshire, Gloucestershire, Worcestershire and Herefordshire
9 October 2014	Meeting	Bristol Avon Catchment Group
14 October 2014	Email to catchment partnership	Warwickshire Avon Catchment Partnership resent launch email and link to consultation documents
22 October 2014	Meeting	Worcestershire Middle Severn Catchment Partnership
23 October 2014	Meeting regarding Catchment Sensitive Farming	Catchment Sensitive Farming partners to ensure aware of consultation and seeking response
3 Nov 2014	Meeting	Wessex Water
6 Nov 2014	Meeting	Worfe Catchment Partnership
12 Nov 2014	Meeting	Teme Catchment Partnership
21 November 2014	Severn Liaison Panel	eNGOs, Angling, water sector, port sector, catchment partnerships and agricultural stakeholders briefed on the consultation
28 November 2014	Stakeholder meeting	Gloucestershire NFU Severn Estuary stakeholders
2 December 2014	External funding meeting	West Midlands External Funding Action Group: Canal and Rivers Trust, RSPB, Staffordshire Wildlife Trust, Cannock Chase AONB.
December 2014	Stakeholder meeting	Taff, Usk and Wye Local Fisheries Groups
January 2015	Stakeholder workshops	Wye Catchment Partnership, Teme Catchment Partnership, Severn Uplands Catchment Partnership, Worcestershire Middle Severn Catchment Partnership
February 2015	Stakeholder meetings/workshops	North (Wales) Inland Fisheries Group sector meeting, Severn Vale Catchment Partnership, Severn Uplands Catchment Partnership
11 Feb 2015	Meeting	Meres & Mosses Landscape Partnership Scheme
February 2015	Stakeholder meeting	South West Inland and Sea Fishermen and associations, councils in Poole, Dorset, Weymouth, Portland Council, Weymouth, Public Health Agency. Event to review action plans, cost benefit analysis and pollution prevention activities

March 2015	Meeting	Bristol Avon Catchment Partnership meeting to explain cost benefit elements and answer any outstanding questions

Feedback received came from the following groups

Sector	Number of responses
Individual	6
Business/commerce	1
Environment management (including NGOs)	16
Farming/land management	4
Government, local	3
Government, national	3
Leisure/tourism	1
Manufacturing	1
Transport/navigation	2
Utilities	6
Other	4
Total	47

4. Consultation on Strategic Environmental Assessment

Three separate questions were asked about the Strategic Environmental Assessment (SEA). As there was a great deal of cross-over between the questions, the feedback to the three questions is combined within the following summary.

SEA Q1 "Do you agree with the conclusions of the environmental assessment? (yes / no). If not, please explain why."

SEA Q2 "Are there any further significant environmental effects of the draft plan which you think should be considered? If yes, please describe what they are."

SEA Q3 "Are there further mitigations or opportunities that should be considered for the plan? If yes, please give details."

Summary of consultation feedback

Of those replying to the consultation, approximately one third specifically answered the questions about the Strategic Environmental Assessment (SEA). Of that group, the majority were from the environment management sector or were catchment partnerships. Remaining comments came mostly from individuals, local government and the transport and navigation sector.

Some feedback relevant to the SEA was provided in responses to other consultation questions. These comments have been captured in the commentary below.

Of those that responded to the question “Do you agree with the conclusions of the environmental assessment?”, almost twice as many responded ‘yes’ compared with ‘no’ with many respondents providing justifications for their response.

Of the responses to the question “Are there any further significant environmental effects of the draft plan which you think should be considered?”, similar numbers answered ‘yes’ to those that answered ‘no’. Many respondents provided further detail in their response.

Of the responses to the question "Are there further mitigations or opportunities that should be considered for the plan?”, similar numbers answered ‘yes’ to those that answered ‘no’. Many respondents provided further detail in their response.

Overall there was general agreement with the conclusions of the SEA that the River Basin Management Plans will deliver significant positive impacts on the environment.

Approach and scope of SEA

Many respondents supported the approach to the SEA with some praising the integration of ecosystem services into the assessment.

Some respondents felt the SEA was not clear if and how it had influenced the options for the RBMP and that it appeared to just consider the effects of a final set of measures. Some respondents also felt that the conclusions presented in the environmental report were not clear enough. Some suggested the lack of detail on the proposed measures in the draft plan prevented a detailed assessment of the potential environmental effects.

Local and indirect effects

Some respondents raised areas where they felt that the assessment had not considered all of the potential environmental effects of the measures in the draft plans. Many of these were local issues including the indirect negative effects such as the likely disturbance to people during implementation of the measures.

Many of the responses centred around the potential indirect effects of measures to remove or modify existing structures on canals and rivers such as weirs and sluices. Some environmental non-Governmental organisations (eNGOs) were concerned with the negative effects on recreational activities such as canoeing and boating. These eNGOs cited the need to consult local groups on decisions and design to avoid or minimise the impact on recreation.

Many respondents to the Anglian RBMP raised concerns that removal of Lock Corner Weir would have negative effects on people and wildlife.

One comment from local government to the South East RBMP also raised the potential cultural heritage impact of restricting access to watercourses in the New Forest where livestock in rivers have been a traditional aspect of the landscape for centuries.

Wider benefits and effects

An area of concern raised by the environmental management sector was the potential impact on cultural heritage from measures to modify historic features on canals and rivers such as weirs and sluices.

Concern was raised that some measures to re-naturalise rivers could have knock-on effects on flooding. Conversely, others felt that the potential benefits to reduced flood risk from these measures could have been further emphasised in the assessment.

A number of respondents felt that the assessment underplayed the potential benefits that implementing the RBMPs would have to alleviate the effects of climate change – including the effect of climate-induced water stress, while others wanted further information on the 'carbon cost' of implementing measures.

The effect on landscape was another area that some respondents felt was not sufficiently covered in the assessment. These respondents felt the SEA did not recognise the potential negative impacts that measures such as, tree planting and river fencing for water quality protection could have on local landscape quality. Some respondents felt that the assessment could have gone further to consider local landscape character and the impact on designated landscapes and Areas of Outstanding Natural Beauty in particular.

Some respondents felt the assessment was lacking or required greater detail on the following areas:

- the impacts on fish from existing abstractions and impoundments
- the unintended consequences on drought management of changes to abstraction licences
- the spread of invasive species
- the effects on agricultural land of re-naturalising rivers.

Designated sites and Habitat Regulations Assessment

Some responses from the environmental management sector were disappointed that the assessment did not provide a systematic assessment of the impact on all designated sites. These respondents also commented on the planned approach to the Habitats Regulations Assessment (HRA). They raised some concerns about the timing of the HRA, stating that the absence of an HRA at draft plan stage meant less clarity on the effects on European designated sites and a missed opportunity to influence the measures in the draft plan.

Some responses from eNGOs were disappointed that the assessment did not consider local designations such as local wildlife sites, citing the important role that the network of these sites provide to wildlife and the potential role they could provide in the implementation of the measures within the RBMPs.

The RBMP and other plans

Many respondents wanted to understand the role of the RBMP in influencing land and water management including how the RBMPs would help to influence spatial planning. These respondents often suggested that the links between the RBMP and other plans should be made clearer. Some respondents raised a concern that there did not appear to be consideration of the cumulative effects with other plans, other than the local flood risk management plan.

Generally speaking, respondents felt that the RBMP afforded a good opportunity to work with others to deliver greater benefits for the environment. Many respondents also felt the RBMP offered a good opportunity for strategic habitat creation, improved access for the public as well as education and awareness-raising of issues related to water quality.

5. Consultation on Economic Analysis

This section summarises the feedback, from national and river basin district stakeholders to the following questions:

Q1 "Do you have any comments on the scenarios and how they have been produced?"

Q2 "How scenario 5 could be developed to present a preferred option for the impact assessment that will accompany the updated plans in autumn 2015?"

Of those replying to the consultation, approximately 50% specifically answered the questions about the economic analysis. Of that group, half were from the environment management sector or were catchment partnerships. The majority of other comments came from local government, the rural land management sector and utilities.

The majority of respondents who answered the two questions on the economic analysis raised similar issues across both questions. Therefore, a summary of responses to both questions is provided below. Responses relevant to the economic analysis were provided by respondents when answering others consultation questions. These comments have also been captured in the commentary below.

In general respondents agreed that the scenarios are a helpful way to "illustrate the main potential options for the journey towards achieving WFD standards in England". Whilst some respondents expressed an interest in understanding the economic analysis at a local catchment scale, they reflected that the economic analysis is a pragmatic way to identify cost beneficial measures across all river basins under a range of scenarios.

The Catchment Based Approach was widely supported; to encourage combined investment from government, the private sector, third sector and landowners, and to remove the risk of failure should one measure not be met. One water company commented that: "With many future challenges now being multi-agency issues, the integration of decisions across sectors as included in the RBMP we consider is an important process to maintain going forward."

The majority of respondents identified that scenario 5 presents a more realistic view of what measures can be delivered within known funding constraints. However, they felt that given the high level sector groups used in the scenarios, there was insufficient detail in the consultation to understand the types of measures specific to their sector and were unable to fully understand the impacts, costs and potential benefits on their sector.

The majority of responses received from the environment management sector reflected that whilst scenario 5 had been created to manage expectations based on funding known to be available at the time of writing, it lacks ambition and offers something very similar to 'business as usual'. These respondents also stated that, at the very least, they would expect the RBMPs to include water body objectives that reflect the potential benefits under scenario 4. There is concern that scenario 5 fails to meet the requirements of the WFD within this cycle and pushes the bulk of improvements into cycle 3. One water industry respondent noted that the difference in cost between scenarios 4 and 5 implies that achieving the objectives set out for the third cycle will be challenging and will result in a widespread requirement for less stringent objectives or that more time will be needed to deliver the objectives in a cost effective manner.

The majority of respondents commented that it was hard to compare scenario 5 to the other scenarios as it was based on a 6 year forward look whilst the others scenarios are based on a longer appraisal time period of 37 years. The water industry and local government identified that whilst the timescales differ between the scenarios, they also differ to the timescales for the water company business plans and Rural Development Programme making it hard to see how cycle 2 of the RBMP can now influence other programmes. A few consultees questioned how scenario 5 was generated as a progression from scenario 4. They were specifically unclear about what was

included in scenario 5 from scenario 4, particularly whether all the relevant costs had been taken into account to determine which measures are considered disproportionately costly.

There is concern that some organisations such as those associated with ports and harbours, hydropower and energy provision (thermal power) were not properly accounted for when considering the types of measures which are deemed technically feasible, and therefore, the costs and consequences of these for the relevant sector. The rural land management sector requested further evidence to support the benefits values used to generate the different scenarios which are specific to the sector.

A number of water industry respondents also had concerns about the benefits values used; they expressed 'low confidence in the benefit values', concern over the age of the willingness to pay survey data given the different economic climate, and pointed out that single issue studies are likely to give higher values than where consumers are presented with trade-offs between alternative potential improvements. One respondent questioned the methodology for splitting the benefit values between classes. A number of respondents pointed out that environmental recovery often takes a long time and therefore assuming all benefits occur within the assessed scenario period may lead to benefits being overvalued (particularly relevant for scenario 5). The water industry suggested that benefits are assessed over a longer time-frame and to annualise costs and benefits. Another respondent noted that costs and benefits of groundwater improvements had been treated differently resulting in incorrectly increased net present value.

There is general consensus across sectors that it is not clear how the costs are being attributed to sectors other than the water industry. One water company commented that: *"The water industry costs are very detailed and clear but this is not reflected in the other three sectors particularly what proportion these sectors will pay towards picking up good ecological status".* The industry is concerned that, through their customers, they could be bearing a disproportionate burden of the costs compared to the rural and land management sector. Respondents across a range of sectors suggested the scenarios be developed to more accurately reflect the sector relevant costs and the distribution across all sectors.

A large proportion of responses also suggested that the polluter pays principle needs to play a bigger role in how the costs of delivery under scenario 5 are assigned, reflected in the following comment: "The evidence strongly suggests that the focus on developing scenario 5 into a preferred option should be on increasing the contribution from rural land management funding to be more in line with the polluter pays principle."

Conversely, the rural land management sector feel that under scenario 4 there are some very significant annual costs assigned to the rural land management sector of £175 million per year for 37 years. They felt that the negative impacts these costs could have on farming and land management organisations could ultimately cause a net change in the food provisioning ecosystem service. These respondents also emphasised the need to include the contribution that existing mechanisms such as Catchment Sensitive Farming, the Countryside Stewardship Scheme and industry-led initiatives like Campaign for the Farmed Environment make towards achieving the WFD objectives. The sector stresses that government needs to recognise the contribution existing regulation makes to the environmental baseline and acknowledge the progress already made.

Affordability of the scenarios was raised in many responses with some respondents asking for clarity over how or if affordability will be taken into account and what the funding assumptions are based on. One water company was concerned with *"…the concept that the amount of money currently available in national budgets is the maximum extent by which affordability should be measured."* Another commented that "*The rate of investment as illustrated by the ratio of scenario 5 to scenario 4 undiscounted costs is far higher for the water industry than any other sector. This implies that a much higher proportion of sector costs are considered to be affordable in cycle 2 for the water sector than for other sectors."* It was recognised that affordability for thermal energy is difficult to characterise and the sector would welcome engagement on this issue. The water industry suggested evidence is collected to understand where limits of affordability lie, rather than setting affordability to the current level of national funding.

The water industry has asked for assurance *"…that there will be no scope creep over and above the level of investment agreed with Ofwat [during the periodic review]".* The sector also suggested

that the RBMP contains a plan to show the longer term programme of measures required to achieve the WFD objectives, rather than just the next cycle; to ensure a proportional programme for the third cycle. The industry also suggested that the economic appraisal methodology could be improved if costs and benefits were assessed by scheme, not bundles, in order to identify the most worthwhile schemes to progress first. They also raised that the economic analysis was produced during the development of water company plans and the periodic review, therefore, scenario 5 should be updated to reflect current and final decisions.

A number of respondents commented on the costs of improving chemical status being relatively low, quoted at £1,360 million, whilst the recent review of the Environmental Quality Standards Directive considered costs in the order of tens of billions of pounds. One respondent from the water industry raised concern that the economic analysis states these costs may rise significantly as further evidence becomes available but the size of the challenge would suggest a need to consider the requirement for less stringent objectives on economic grounds, or that more time is needed to deliver cost-effective measures.

6. Next steps

Every response to the consultation has been thoroughly read, and the comments reviewed to consider how they might influence the forthcoming river basin management plans and the future approach to planning and implementation. This has taken place at a national level and a local level, depending on the nature of the consultation comments - involving partners and respondents where necessary.

The Environment Agency will produce a further document, describing how the main points raised in the consultation have influenced the updated river basin management plans and will continue to influence work in the 2nd cycle and planning for the 3rd cycle.

River basin management plans (within England) will be updated in December 2015 then presented to government for approval. You can view the submitted documents online. For more information please go to https://www.gov.uk/government/collections/river-basin-management-plans

Annex 1. List of consultation participants

The following table identifies the organisations who took part in the consultation. Individuals are not included, and where some organisations replied separately to more than one river basin district, they are included only once, unless the specifically identified as a local part of a national organisations.

Organisation

Action for the River Kennet
Adur and Ouse Catchment Partnership
Affinity Water Ltd.
Agriculture and Horticulture Development Board
Aire Action Leeds
Aire and Calder Catchment Partnership
Aire Rivers Trust
Alt/Crossens Partnership
Amenity Forum
Anglian Water
Angling Trust East of England Forum
Angling Trust Thames Regional Forum
Aquafish Solutions Ltd.
Arnside and Silverdale AONB
Arnside and Silverdale AONB Forum
Arun and Western Streams Catchment Partnership
Ashford Borough Council
Associated British Ports
Association of Drainage Authorities
Association of Greater Manchester Authorities
Aune Conservation Association
Barnsley Metropolitan Borough Council
Basildon Borough Council
Basingstoke constituency
Bedford Borough Council
Bedford Group of Drainage Boards
Berks, Bucks & Oxfordshire Wildlife Trust
Beswick Parish Council
Beverly Brook Catchment Partnership
Birkin Fly Fishing Association
Birmingham and Black Country Local Nature Partnership
Birmingham and Black Country Wildlife Trust
Blackpool Council
Blueprint for Water*
Blunham Parish Council
Bolton Metropolitan Borough Council
Borough Council of King's Lynn & West Norfolk
Brecon Beacons National Park Authority

Brighton & Lewes Downs Biosphere Partnership
Bristol Avon Catchment Partnership
Bristol Port Company
Bristol Water
British Marine Federation
British Ports Authority
Broadland Catchment Partnership
Buglife
Burnley Council
Bury Council
Bury Water Meadows Group
Cam & Ely Ouse Partnership
Cam Valley Forum
Cambridge Water
Cambridgeshire Acre
Campaign to Protect Rural England
Canal & River Trust
Catchment Partnership for Cornwall
Cefas
Central Bedfordshire Council
Chartered Institute of Ecology and Environmental Management
Cherwell District Council
Chesham & District Natural History Society
Chilterns Conservation Board
Chorley Borough Council
CLASP
Coal Authority
Coastal Groups England
Confor Wales
Consumer Council for Water
Copeland Borough Council
Cotswolds Canal Trust
Cotswolds Conservation Board
Country Land and Business Association
Country Land and Business Association - South East
Country Land and Business Association East
Country Land and Business Association North
Country Land and Business Association SW

Cuckmere and Pevensey Levels Catchment Partnership

Cumbria County Council

Cumbria Wildlife Trust

Dales to Vale Rivers Network

Darent Partnership hosted by NW Kent CP

Darent River Preservation Society

Devon County Council

Devon Wildlife Trust

Don Catchment Rivers Trust

Douglas Catchment Partnership

Dove Catchment Partnership

Downham Market Group of IDBs

Durham Amateur Rowing Club

Durham Heritage Coast Partnership

Dwr Cymru Welsh Water

East Devon Catchment Partnership

East Hampshire Catchment Partnership

East Riding of Yorkshire

East Suffolk Catchments Partnership

East Suffolk Water Abstractors Group

East Yorkshire Rivers Trust

Eden Catchment Improvement Group

EDF Energy

Ely Group of IDBs

Energy UK

English Heritage

Esk and Coastal Streams Catchment Partnership

Essex County Council

Essex Wildlife Trust

Essex Wildlife Trust on behalf of the Essex Rivers Hub (the Combined Essex Catchment partnership)

Exe Estuary Management Partnership

Exmoor National Park Authority

Exmouth Mussels Ltd

Farmers Union of Wales

Foundation for Water Research

Freshwater Habitats Trust

Friends of the Westbrook and Stonebridge Pond

Farming and Wildlife Advisory Group

Fylde Borough Council
Gateshead Council
Greater London Authority
Gloucestershire County Council
Greater Lincolnshire Nature Partnership
Greater Manchester Ecology Unit
Green Corridor
Groundwork Cheshire
Gwent Wildlife Trust
Halton Borough Council
Hampshire and Isle of Wight Wildlife Trust
Hampshire Avon Catchment Partnership
Harrow Council
Healthy Waterways
Herefordshire and Gloucestershire Canal Trust
Hertfordshire County Council
Herts & Middlesex Wildlife Trust
Heysham Port Limited
Highways Agency
Highways England
Histon & District Angling Society
Historic England
Hogsmill River Catchment Partnership
Humber Nature Partnership
Idle Catchment Partnership
INCA (Industry Nature Conservation Association)
Inland Waterways Association
Inland Waterways Association Kent & East Sussex Branch
Inland Waterways Association, Lichfield Branch
Institute of Civil Engineers
Ipswich Borough Council
Irwell Catchment Partnership
Island Rivers Partnership
Kent County Council
Kent Fisheries Consultative Association (KFCA)
Knowsley Metropolitan Borough Council
Lake District National Park
Lancashire County Council

Lancashire Wildlife Trust

Lancaster City Council

Leicester City Council

Local Government Association - Coastal SIG

Lincolnshire Chalk Streams Project

Lincolnshire Rivers Trust

Lincolnshire Waterways

Lincolnshire Wildlife Trust

Lincolnshire Wolds Countryside Service

Lindsey Marsh Drainage Board

Local Amenity Society

Local Neighbourhood Group (CR3)

London Wildlife Trust

Lower Mersey Catchment Partnership

Lower Ouse & Fenland Fisheries Consultative Association (LOFFCA)

Lune Rivers Trust

MannPower

Marine Management Organisation

Medway Valley Countryside Partnership on behalf of the Beult Catchment Improvement Group

Medway Valley Countryside Partnership on behalf of the Middle Medway Catchment Group

Meres and Mosses Landscape Partnership

Mersey Docks and Harbours Company Limited

Middle level Commissioners

Midland Wind and Water Mills Group

Mole Valley District Council

Moors for the Future

National Farmers Union

National Farmers Union - Midlands

National Farmers Union - North East

National Farmers Union - SW

National Farmers Union - Thames

National Farmers Union East Midlands Region

National Farmers Union NW

National Farmers Union SE Region

National Federation of Fishermen's Organisations

National Trust

Natural Resources Wales

NE Lincolnshire Council

Nene Valley Nature Improvement Area

New Forest Catchment Partnership

Norfolk and Suffolk Boating Association

Norfolk Coast Partnership

Norfolk Rivers Trust

North Devon & Torridge District Council

North Devon UNESCO Biosphere Reserve

North East Herts Constituency

North Kent Catchment Improvement Group

North Level IDB

North Walsham Canal Company Ltd

North West Coastal Group

North West Kent Countryside Partnership on behalf of Cray & Shuttle Catchment Improvement Group

North West Regional Flood and Coastal Committee

North Yorkshire District Council

Northampton Council

Northumberland Inshore Fisheries & Conservation Authority

Northumberland National Park

Northumberland National Park Authority

Northumberland Rivers Catchment Partnership

Northumberland Rivers Trust

Northumbrian Water Limited

Odiham Society

Ofwat

Othniel Oysters

Ouse & Adur Rivers Trust

Peel Ports

Port of London

Pupils2Parliament

Radnorshire Wildlife Trust

Redcar and Cleveland Borough Council

Ribble Life - Ribble Fisheries

Ribble Life Catchment Partnership

Ribble Valley Borough Council

River Chess Association

River Glaven Conservation Group

River Nene Regional Park - Community Interest Company

River Restoration Centre

River Tarrant Preservation Society
River Thame Conservation Trust
River Thet Catchment Water Resources Group
River Torne Catchment Partnership
Rivers Return Catchment Partnership
Rivers Trust
Rochdale Borough Council
Royal Borough of Windsor & Maidenhead
Royal Yachting Association
RSPB
RSPB (Yorkshire)
RSPB (Northern England)
Salmon and Trout Association
Sandy Town Council
Scarborough Borough Council
Seafish
Sefton Council
Sembcorp Bournemouth Water
SEPA
Severn Estuary Partnership
Severn Rivers Trust
Severn Trent Water
Sheffield and Rotherham Wildlife Trust
Shellfish Association of GB
Shropshire Hills AONB Partnership
Shropshire Wildlife Trust
Solihull MBC
Somerset Catchment Partnership
South Cumbria Rivers Trust
South Downs National Park Authority
South East River Trust on behalf of the Strategic Medway Catchment Partnership.
South East Rivers Trust
South East Water
South Pennines Local Nature Partnership
South Ribble Valley Council
South Staffordshire Water plc
South West Coastal Paths Association
South West Rivers Association

South West Water
Southern Water
St Helens Borough Council
Staffordshire Council
Staffordshire Trent Valley Catchment Partnership
Stockton Council
Stour Catchment Improvement Partnership
Suffolk County Council
Surrey County Council
Surrey Wildlife Trust on behalf of the Mole Catchment Partnership
Sussex Wildlife Trust
Swale Borough Council
Tamar & Tributaries Fishing Association
Tamar Catchment Partnership
Tamar Estuaries Consultative Forum
Tawstock Parish Council
Tees Rivers Trust
Tees Valley Wildlife Trust
Teise Catchment Improvement Group
Test Borough Council
Thames Water Utilities Limited
Thames21
Thames21 on behalf of Ravensbourne Catchment Partnership
The Arun and Rother Rivers Trust (ARRT)
The Birmingham & the Black Country Local Nature Partnership
The Broads Authority
The Catchment Initiatives, Wessex Water
The Consumer Council for Water
The Forest of Marston Vale
The North Walsham and Dilham Canal Trust
The Verderers of the New Forest
The Wildlife Trust for Birmingham & the Black Country
The Woodland Trust
Three Rivers Local Nature Partnership
Tidal Lagoon Power
Tonbridge & Malling Borough Council
Trent Rivers Trust
Tyne Rivers Trust

UK Major Ports
United Utilities
University of East Anglia
Upper & Bedford Ouse Catchment Partnership
Upper Medway Catchment Improvement Group
Upper Mersey Catchment Partnership
Urban Vision - Salford Council
Viking Kayak Club
Wales Wild Land Foundation
Wandle Catchment Partnership
Warrington Borough Council
Warwickshire Wildlife Trust
Water Health Partnership for Wales
Water Management Alliance
Water UK
Water@leeds, University of Leeds
Wear Rivers Trust
Weaver Gowy Catchment Partnership
Welland Rivers Trust
Wessex Water
West Country Rivers Trust
West Cumbria Catchment Partnership
West Cumbria Rivers Trust
Westcountry Rivers Trust
Wey Landscape Partnership
Whitewater Preservation Society
Wild Trout Trust
Wildfowl and Wetlands Trust
Wiltshire Wildlife Trust
Wirral Borough Council
Wirral Council (Regeneration and Environment)
Witham 3rd Internal Drainage Board
Woodland Trust
Worcestershire Wildlife Trust
WWF, Angling Trust, Fish Legal
Wye and Usk Foundation
Wyre Forest District Council
Wyre Rivers Trust

Wyre Rivers Trust & Wyre Waters Catchment Partnership
Yealm Angling Club & River Yealm Fishing Association
Yorkshire Farming and Wildlife LLP
Yorkshire Water
Yorkshire Wildlife Trust
Your Tidal Thames Catchment Partnership

*The Blueprint for Water response was made on behalf of the following organisations:

- Amphibian and Reptile Conservation
- Angling Trust
- Buglife - The Invertebrate Conservation Trust
- Freshwater Habitats Trust
- Friends of the Earth England
- Institute of Fisheries Management
- Marine Conservation Society
- National Trust
- Royal Society for the Protection of Birds
- Salmon and Trout Association
- The Rivers Trust
- The Wildlife Trusts
- Wild Trout Trust
- Woodland Trust
- Wildfowl & Wetlands Trust
- WWF – UK

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