



# Challenges & Choices Consultation 2020

## What is the Challenges & Choices Consultation?

The Challenges and Choices Consultation is being carried out by the Environment Agency and seeks to understand the views of many stakeholders, including the public, on the challenges our waters face in the UK and the choices we collectively need to make to tackle those challenges. It presents a unique opportunity to help shape the management of the water environment here in England. The final plans will contain legally binding water environment objectives and a summary of the programmes of measures to guide the work of Defra, the Environment Agency, water companies and catchment partnerships' over the next six years.

There are significant challenges facing water in England and it's vital that strong sustainable management is put in place across all sectors to secure this finite resource for future generations. As the Angling Trust, we will be seeking robust management to safeguard our declining freshwater biodiversity from the risks of over-abstraction, to limit damaging agricultural pollution and to secure water storage for protection against drought and water scarcity, to name a few of the actions we are campaigning for in light of this consultation.

## How Can You Participate In The Consultation?



Here at the Angling Trust we know this consultation is one that many of anglers would like to have their say on and so we have created the following information guide with example points for each question that you can use to get the key information included.

Complete the consultation here: <https://consult.environment-agency.gov.uk/environment-and-business/challenges-and-choices/consultation/>

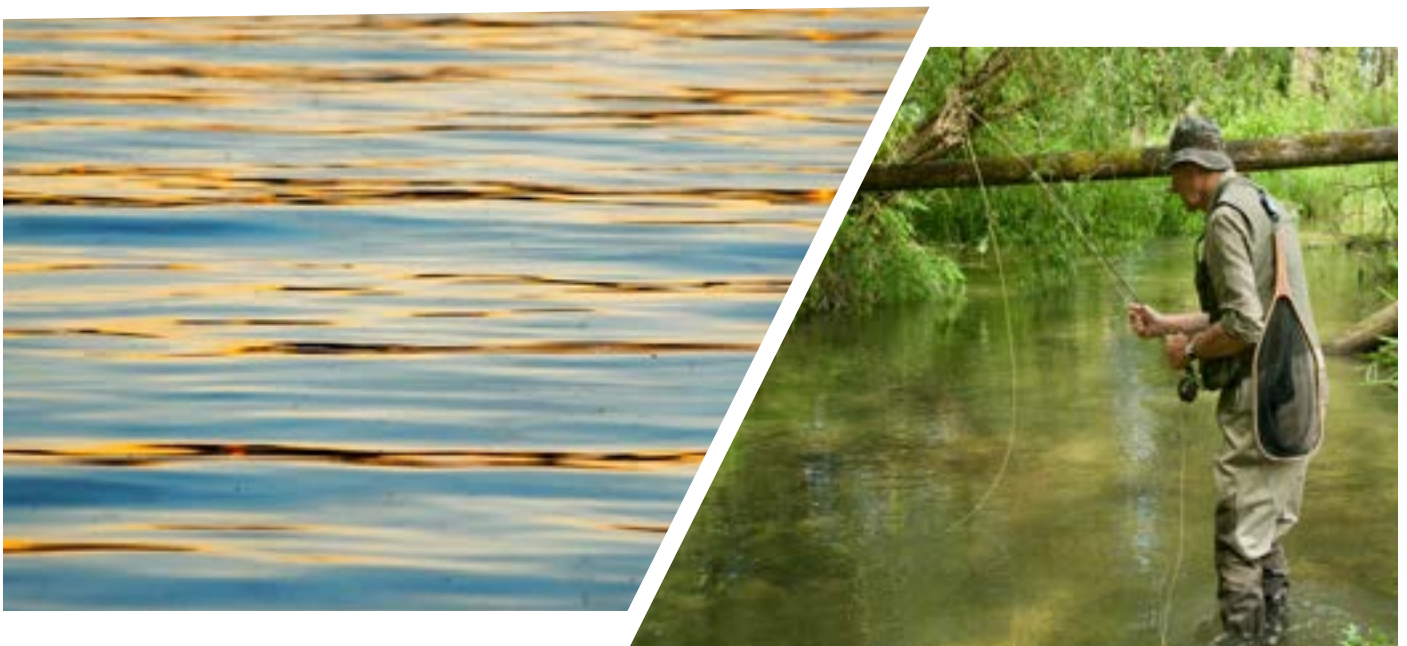
# The Water Story

1. The way we treat water today will shape all our futures.

What changes can you make to improve the water we rely on?

## Suggested points:

- We must recognise the different impacts on the freshwater environment and how they are related to one another. It is important to support solutions to these challenges that address more than one impact. For example, managing flood flows also decreases pollutant-rich runoff and restricts the movement of invasive species.
- We must prioritise the conservation of freshwater biodiversity at a local level. The British Isles are home to unique aquatic ecosystems, with England being home to almost 85% of the world's chalk streams.
- We must work together to reverse freshwater biodiversity loss and we must collaborate across society to prioritise the conservation of these aquatic ecosystems to support healthy environments for fish.

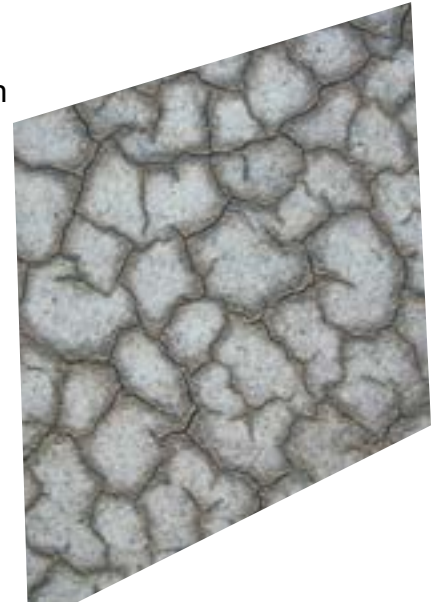


# Climate Change & Biodiversity Crisis

**2. What more can we do to tackle the impacts of climate change on the water environment and what additional resources (including evidence, targets, tools and additional mechanisms/measures) do we need to do this?**

**Suggested points:**

- You need to invest more in reservoirs and water storage. This is so that we are able to store surplus water at times of plenty and prevent environmentally damaging over-abstraction and drought in times of scarcity. Better management of leakage is also required, including the introduction of compulsory water metering.
- Our waterways must be made more resilient in order to adapt and mitigate to the impacts of climate change. This means keeping more water in our environment and ensuring our freshwater ecosystems are good places for fish to thrive, they are clear, or good quality, and support a good level of biodiversity.
- Collaboration across the river basin network must be successful for sustainable water management to be achieved.



**3. What can we do to address this biodiversity crisis and meet the 25 Year Environment Plan targets for wetlands, freshwater, coastal habitats and wildlife?**

**Suggested points:**

- Reducing the damage of abstraction is paramount to the recovery of biodiversity within both river systems and wetlands.
- Agricultural reform is essential for addressing the biodiversity crisis and meeting the 25 Year Environment Plan targets.
- Changes in wider land management practices are also integral due to the impacts of agriculture land management and pollution on the freshwater environment.
- The ecological and ecosystem services value of floodplains need to be better recognised.



- Restoration and recreation of wetland habitats, including reedbeds, wet meadows and wet woodlands, are crucial to safeguarding biodiversity, healthy functional ecosystems and the provision of ecosystem services.
- Connectivity is an important aspect for healthy, functioning ecosystems and should be incorporated into Nature Recovery Network planning.



**4. Environmental targets can generate action and provide a strong signal of intent. Could additional statutory targets contribute to improving the water environment? If so, what types of targets should be considered?**

**Suggested points:**

- Agricultural pollution targets should be assessed at the individual river level. Any localised problems in relation to farming practices, such as those occurring at small farms, should be looked at in particular as these would be apparent through this approach.
- Environmental targets could be set through the Environment Bill and would support the success of many of the goals set out in the 25 Year Environment Plan. It is important that these targets are made as a requirement of the Environmental Land Management payment scheme being introduced as part of the Agriculture Bill.
- Within environmental targets a clear definition of ‘good status’ should be included for a range of small water bodies, including ponds, small lakes and headwater streams.

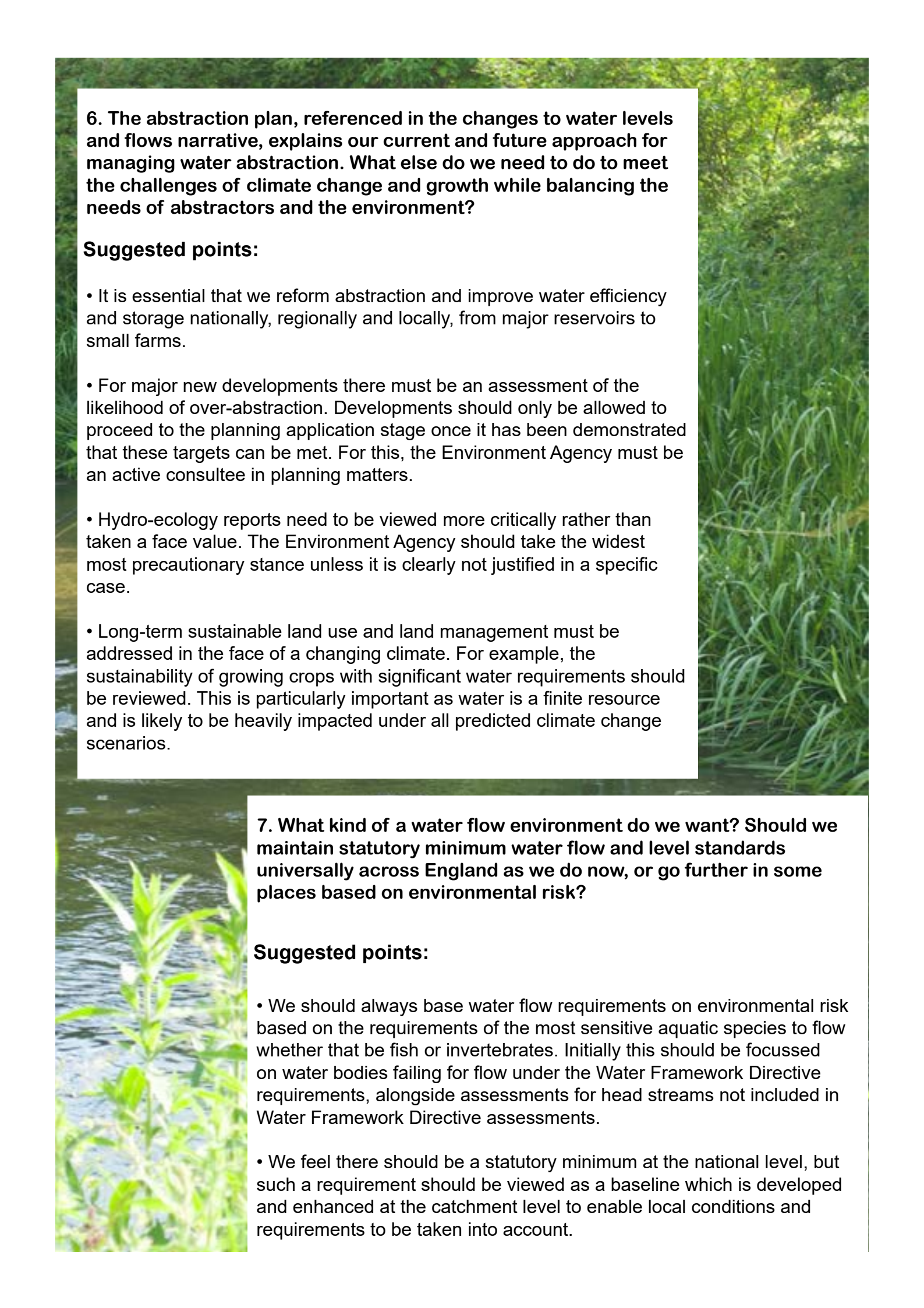
# Changes to Water Levels & Flows

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

### Suggested points:

- Reforming abstraction and improving both water efficiency and storage at a variety of scales, from major reservoirs to small farms, is integral to tackling the pressures contributing to changing water levels and flows.
- Dredging reform and planned inundation, like sacrificial flood plains, are also important forms of management.
- Within new developments there must be the inclusion of permeable pavements and roads so that the problems created by run-off are not increased. In practice this will reduce both the risk and severity of floods.
- Reducing water waste at the community level should be developed through initiatives in partnership with water companies and stakeholders. These initiatives are not only important in improving water efficiency, but also the gained educational and behavioural changes adopted.
- Temporary Use Bans, previously known as hosepipe bans, should be reassessed to improve their effectiveness, and their implementation as part of a sustainable water management regime should not be penalised.
- The Environment Agency should lobby hard in any consultations over planning reform to have these introduced into the planning framework.

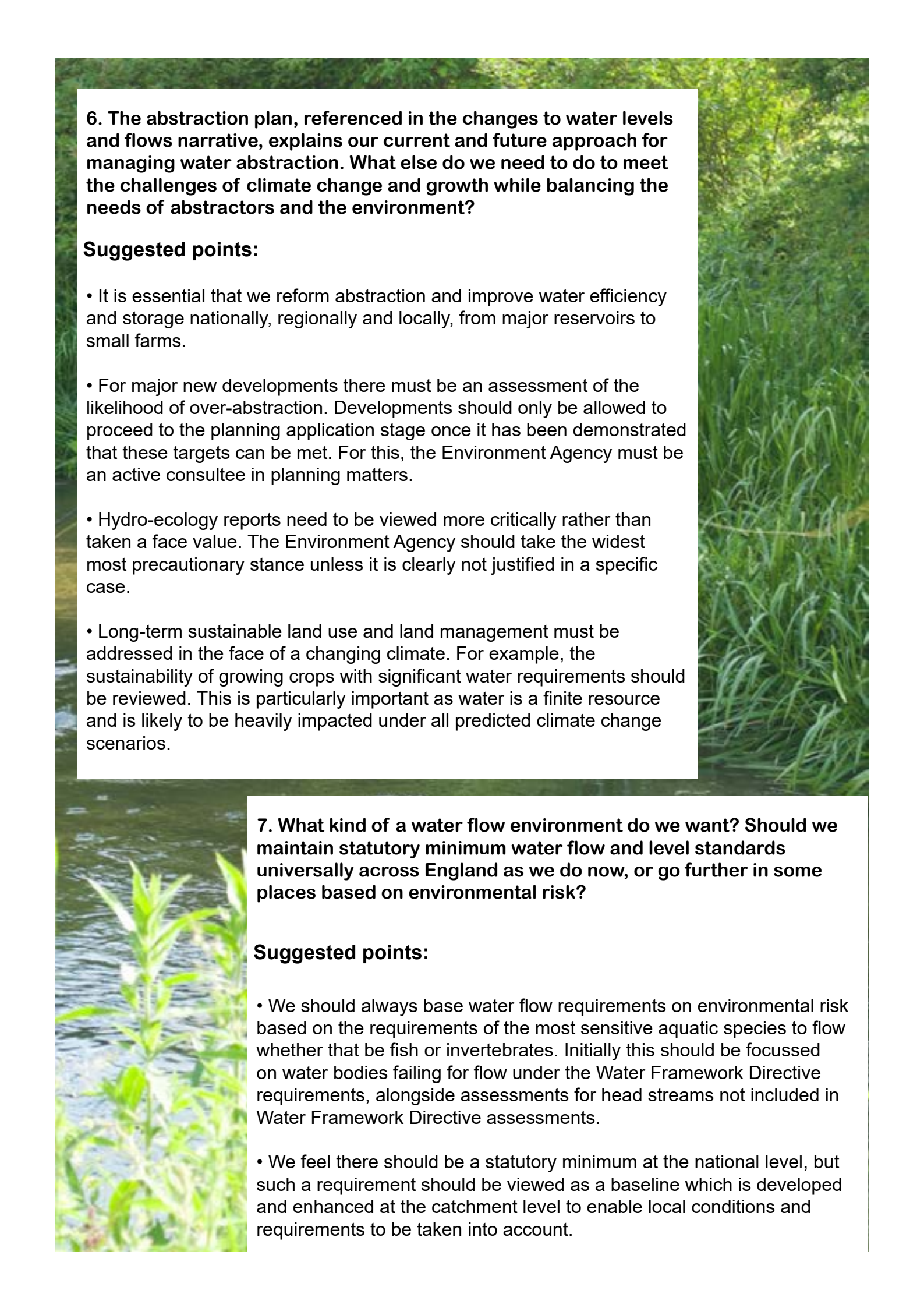




**6. The abstraction plan, referenced in the changes to water levels and flows narrative, explains our current and future approach for managing water abstraction. What else do we need to do to meet the challenges of climate change and growth while balancing the needs of abstractors and the environment?**

**Suggested points:**

- It is essential that we reform abstraction and improve water efficiency and storage nationally, regionally and locally, from major reservoirs to small farms.
- For major new developments there must be an assessment of the likelihood of over-abstraction. Developments should only be allowed to proceed to the planning application stage once it has been demonstrated that these targets can be met. For this, the Environment Agency must be an active consultee in planning matters.
- Hydro-ecology reports need to be viewed more critically rather than taken a face value. The Environment Agency should take the widest most precautionary stance unless it is clearly not justified in a specific case.
- Long-term sustainable land use and land management must be addressed in the face of a changing climate. For example, the sustainability of growing crops with significant water requirements should be reviewed. This is particularly important as water is a finite resource and is likely to be heavily impacted under all predicted climate change scenarios.



**7. What kind of a water flow environment do we want? Should we maintain statutory minimum water flow and level standards universally across England as we do now, or go further in some places based on environmental risk?**

**Suggested points:**

- We should always base water flow requirements on environmental risk based on the requirements of the most sensitive aquatic species to flow whether that be fish or invertebrates. Initially this should be focussed on water bodies failing for flow under the Water Framework Directive requirements, alongside assessments for head streams not included in Water Framework Directive assessments.
- We feel there should be a statutory minimum at the national level, but such a requirement should be viewed as a baseline which is developed and enhanced at the catchment level to enable local conditions and requirements to be taken into account.

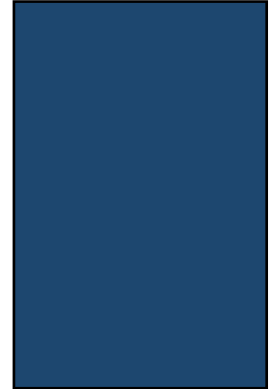


# Chemicals in the Water Environment

**8. What can be done to address the challenge of chemicals in the water environment?**

**Suggested points:**

- It is important that we are precautionary in our approach and extend chemicals on the *Watch List* as they are developed and considerably widen *Watch List* monitoring sites to reflect river and water body types. This will provide more data for decisions on their use and licensing.



**9. Do you support the Environment Agency's proposed strategic approach to managing chemicals as referenced in the Chemicals in the Water Environment challenge document? If not, what changes would you make?**

**Suggested points:**

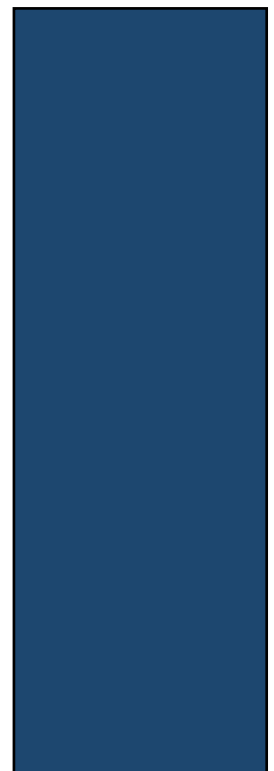
- In order for there to be support for this approach it needs to be fully funded together with a funded state-of-the-art monitoring system to engage with widespread monitoring of water bodies. It is important that this has the ability to monitor on a 24-hour basis with horizon scanning.



**10. What balance do you think is needed between current chemical use, investing in end-of-pipe wastewater treatment opinions and modifying consumer use and behaviour?**

**Suggested points:**

- The Environment Agency should prioritise inspection and audit scheduling around those industries retaining more harmful or potentially harmful processes.
- The Environment Agency should encourage new products to actively reduce the number of chemicals involved with their manufacture and to encourage natural alternative measures to chemical use. The Government should incentivise this with awards and competitions for green design.
- It is important that manufacturing takes the lead in developing greener products not consumerism.



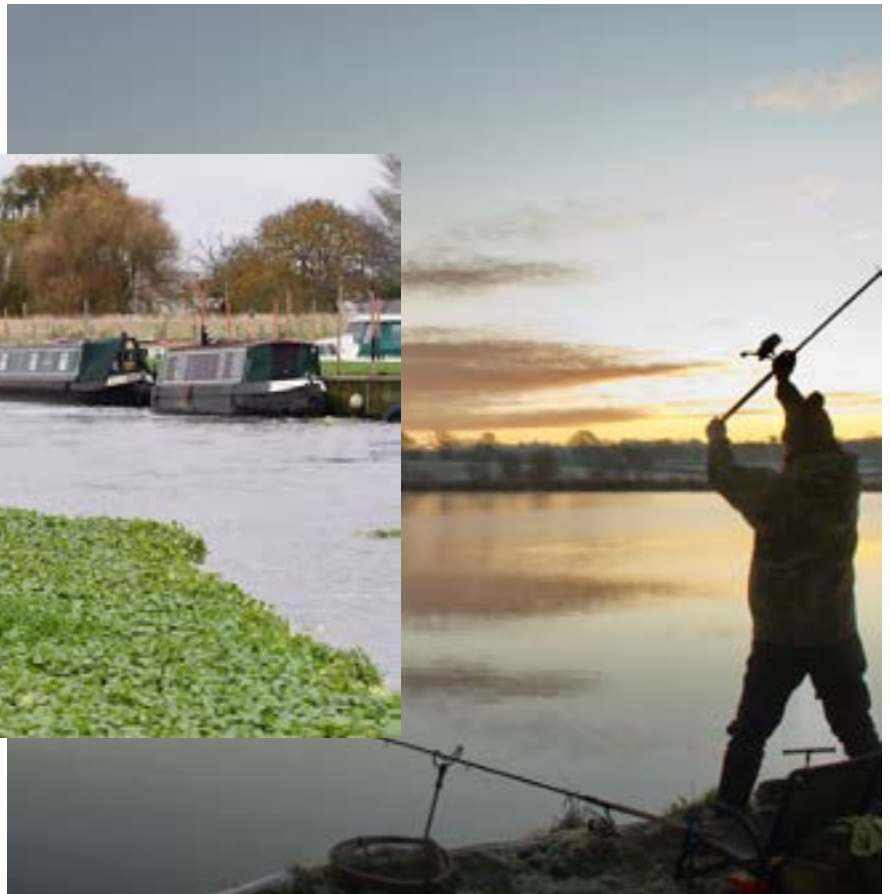
# Invasive Non-Native Species



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

### Suggested points:

- It is critical that strong management plans with a catchment-based approach are used to address invasive non-native species. This could be put into place through the inclusion of invasive non-native species in Environmental Land Management schemes. It is also important for proper implementation and enforcement of Pathway Action Plans.
- More funding is required to effectively manage invasive non-native species and to provide management plans with effective levels of monitoring and enforcement.
- The Government should launch an Invasive Non-Native species Inspectorate which provides more wildlife officers and enables increased prosecutions for the release of invasive non-native species. The Inspectorate should have responsibility for implementing stricter border control checks for invasive non-native species.





## 12. How would you promote Check, Clean, Dry to all recreational users of water, including those who are in clubs or attend events?

### Suggested points:

- Changing behaviours to make biosecurity part of the everyday routine requires adoption of biosecurity from a young age.
- Running a series of awareness-raising events to increase the general public's awareness of invasive non-native species and biosecurity.
- Invasive non-native species and biosecurity should be added to the primary and secondary school curriculum and demonstrated on all field trips including residential trips to field study centres.
- Funding should be provided to support the installation of wash down facilities at high-risk sites that contain either highly impactful invasive non-native species or at locations that are at substantial risk from invasion.
- Engaging celebrities with the Check, Clean, Dry campaign and getting them to promote and demonstrate good biosecurity through their media channels would help to endorse biosecurity to new individuals and normalise biosecurity behaviour within the sport.
- Although recreational users may not be attending competitions in person, someone interested in the sport may watch large national or international events online. Including the CCD materials at these events, and/or having it covered in the live coverage presents an opportunity to large numbers of individuals that partake in that activity.

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

### Suggested points:

- Recreational equipment like canoes and kayaks are also a barrier to obtaining good biosecurity as users frequently are unable to access wash down facilities in between visiting numerous sites.
- Environmental officers and volunteers can check and clean their boots between visits; however, they frequently do not have sufficient time to dry boots between sites which they visit daily during the summer months. In these instances, some opt to have two pairs of equipment, but alternating between days can still be an inadequate time frame for equipment to dry properly.
- The size of equipment used is also often a barrier to achieving good biosecurity, as for some aspects of work, large machines and boats are required. These pieces of equipment cannot be cleaned onsite without the presence of a wash down facility and present a hard task to clean and dry between trips, especially in hard to reach areas.

# Physical Modifications

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

**Suggested points:**

- Removing unnecessary modifications and barriers which prevent fish migration must continue.
- The maintenance of these features where they enhance habitats or can assist with flood management and river flow, such as fish and eel passes, must also continue.
- Management methods which include nature-based solutions and/or natural flood management should be prioritised wherever possible.
- The preference for hard engineering solutions should be resisted in favour of nature-based solutions which will aid with climate change mitigation strategies.

**15. Giving more space for rivers and coasts to move and adjust naturally will regenerate habitat, improve wildlife and help us adapt to climate change. What can you and others do to support these changes?**

**Suggested points:**

- It is crucial that spatial planning prevents development on floodplains, and measures to ensure sustainable land use (e.g. arable reversion) and management (e.g. crop rotations) will be necessary to support our adaptation to the effects of climate change, helping to restore the functionality of some floodplains.
- Planning restrictions to manage further development along floodplains is important.
- Additional funded support for marginal fencing and tree planting schemes is integral.
- Through the Environment Land Management scheme there is the possibility to encourage the introduction of a 25-metre riparian zone along rivers to assist in allowing a more natural flow to the river.

# Plastic Pollution

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

### Suggested points:

- Encouraging a reduction in the amount of plastic used in clothing and other synthetic fibrous products in order to tackle microplastic pollution.
- Many other materials, not only plastics, have environmental impacts on our aquatic environments. It is important to recognise this so that there isn't just a shift from plastic to another harmful product.
- Citizen science projects can be crucial to monitor microplastics throughout the country through river cleans and beach cleans paired with monitoring programmes and educational material on reducing macro- and micro- plastics in the home.
- We will support actions taken to decrease the manufacture and use of single-use plastics, such as through The Plastic Pollution Bill (PPB), and initiatives to lower plastic littering, like the recently adopted deposit-return schemes.
- The origin of much marine litter is via rivers, washed in from the land or via drainage systems, therefore there is a necessity for heightened public awareness through 'Yellow Fish' schemes.
- Management measures including water sensitive urban design (WSUD) and sustainable drainage systems (SuDS) should be made a priority for new developments and integrated into planning regulations due to their role in filtering wastewater.

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

### Suggested points:

- When awarding beaches with Blue Flag status, there should be a requirement for the implementation and enforcement of litter control. Along similar lines, water discharge permits should include zero plastic prerequisites.
- Microplastics should be added to the list of pollutants regularly monitored in inland waters, requiring agreement of an accurate, repeatable, reportable method for microplastic quantification. The full consequences microplastics are having on organisms, ecosystems and human health, are not yet known, but we should not wait until any harmful effects are determined before seeking to understand the extent of microplastic pollution.
- In addition to plastics and microplastics there are likely a range of other chemicals, or mixtures of chemicals, that we are not currently monitoring for and so we know little of their extent or impacts, and so we should invest more in investigating these further.

## Section 8



# Pollution from Abandoned Mines

## 18. What can be done to address pollution from abandoned mines?

### Suggested points:

- Biomanipulation and the use of diversion to settlement lagoons are just two of a number of means to reduce heavy metal contamination from abandoned mines. These methods should not be used widely.
- Cleaned up abandoned mines would be a valuable tool in Natural Flood Management.

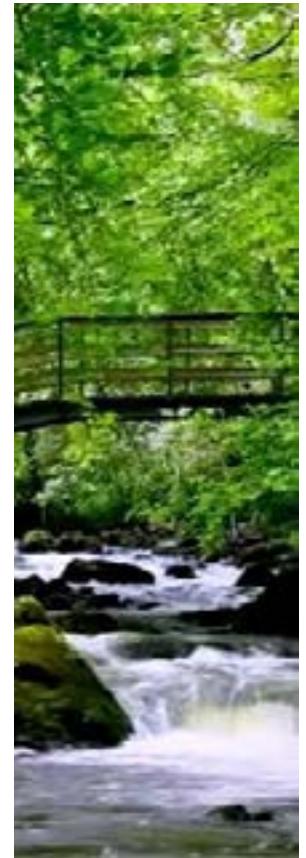


# Pollution from Agriculture & Rural Areas

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

### Suggested points:

- The implementation of measures in the Agriculture Bill and Environmental Land Management Schemes (ELMs) on requirements and payments, improved slurry and silage regulations, better enforcement of farming rules for water and enhanced measures within water protection zones.
- The introduction of tailored Nitrate Vulnerable Areas and Water Protection Zones will enable a focus on all sources of water pollution, not just agriculture. Regulation is a crucial part of the wider policy package aimed at reducing diffuse pollution and national nutrient surpluses.
- An increase in resourcing for monitoring and compliance will need to accompany any new regulations as well as the Government ensuring that available grants, loans and subsidies support the agricultural sector transition.



## 20. How can we support the farming sector to excel at innovative solutions which benefit both productivity and the environment? What should these solutions look like?

### Suggested points:


- A new Environmental Land Management Scheme should identify suitable options that fund farmers to genuinely deliver for nature, using Tests & Trials to explore options. Measures specific to floodplain management would be valuable to deliver biodiversity, water quality and flood risk management benefits in a coherent way.
- Adequate funding for innovation and research is required, and should be centrally coordinated, perhaps via the establishment of a body equivalent to UKWIR for the water industry.
- A greater focus on soil health is needed to benefit both productivity and the environment; water running off farmland carrying soil and agrochemicals are major threats to production and have significant impacts on the freshwater environment.

# Pollution from Towns, Cities & Transport

**21. What can be done to address pollution from town, cities and transport? What should these solutions look like?**

**Suggested points:**

- Sustainable drainage systems and urban wetlands will be key in addressing pollution from towns, cities and transport, alongside the provision of mapping information to households and the use of monitoring technology. Changes to the planning laws will also allow for sustainable drainage and not paving gardens.
- Additional steps include the adoption of permeable pavements and roads, dis-incentives to use non-sustainable products like plastic wet wipes and fast food packaging, and incentivising refilling as opposed to fresh packaging (the new deposit-return scheme will help).
- Encouraging rural public transport services.



**22. How can sustainable drainage systems and green infrastructure be most effectively used to tackle pollution from urban areas? What challenges are there to using them?**

**Suggested points:**

- Impacts on water quality from a new development should be considered in the early stages of the design process and a greater emphasis on high quality design, both of buildings and places, is needed.
- For habitats that have been restored, biodiversity net gain could play a role in assisting with the regulation of water flow. It is important that this improvement in biodiversity and environmental net gain is in addition to current requirements to deliver both green and blue infrastructure.
- It must be made mandatory for green infrastructure measures, like Water Sensitive Urban Design, to be included in land use planning.

# Pollution from the Water Industry



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

### Suggested points:

- End to allowing water companies to use storm incidents to discharge untreated sewage into our rivers.
- The development of tools used for the Water Resources Management Planning process for Drainage and Wastewater Management Plans (DWMPs).
- It is important that we formalise and standardise the planning procedure for future housing, including drainage and wastewater systems, particularly in the face of climate change.
- A transition to tertiary waste water treatment plants as seen commonly in Switzerland.

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

### Suggested points:

- The Drainage and Wastewater Management Plans (DWMP) framework identifies the need for collaborative planning. Local knowledge will help to inform effective plans, such as by identifying areas where misconnections are common.



# Catchment Partnership Working

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

### Suggested points:

- For local Catchment Partnerships to be successful they require voluntary engagement. However, national organisations across the country could be better at flagging and encouraging engagement through business, government and environmental non-governmental organisations.
- Catchment Partnerships must become more inclusive and representative of all stakeholders, including anglers. It is important that Partnerships are funded sufficiently in order for them to do this.

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

### Suggested points:

- Better engagement with businesses that can benefit, e.g. Food Supply Chain companies, and a more focussed approach by government in raising this with companies that have social responsibility requirements in their business model.
- Defra and Environment Agency funding support need to be more consistent with a programme of funding set out over a minimum 5-year period. The short-term nature of funding available to partnerships for core costs limits their scope to do more.
- It must be recognised that Catchment Partnerships, where well supported, are best placed to achieve some elements of water management.





# Who Pays?

**27. How should the step change in protecting and improving the water environment be funded and who should pay? Are there any barriers to doing this?**

**Suggested points:**

- There must be a commitment from Government to provide public funds to enable change in safeguarding and improving the water environment and to back up commitments set out in the 25 Year Environment Plan.
- The major obstacle to effective compliance with existing regulation is the lack of funding for enforcement, and Government should recognise the significant cost savings associated with investing in enforcement.
- For rural pollution, we support a move over time toward the ‘Five P’ approach to regulation – where the ‘potential polluter pays to prevent pollution’.
- Beyond regulation and enforcement, where the cost burden should largely lie with the polluter, the benefits of a healthy freshwater environment are received by all, so should to some extent be funded by all.

