

Submitted to Draft river basin management plans
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Introduction

Implementing the plan

1 What are your views of these principles? When thinking about your answer, you may wish to consider how easy (or hard) you would find adopting the principles.

Enter your response in the box below:

We support the principles proposed to be followed when implementing measures to meet the RBMP for the Ock. In particular we strongly welcome the increased focus on working with natural processes and nature based solutions to deliver catchments that are resilient and adapted to climate change and the impacts of farming and development, more biodiverse, better able to limit adverse impacts from flood and drought events and can recover from environmental shock.

We are concerned about how these principles will be delivered in practice. The RBMP strategy would benefit from mandating a checklist by which all measures should be scored against these principles, with only those meeting all principles going forward for funding. We remain uncertain about the consistency by which these principles are integrated into processes, planning and permitting by the Environment Agency.

In particular we strongly support the principle to "Promote restoration and recovery of freshwater, estuarine and coastal habitats and species". This is perfectly aligned with FHT's groundbreaking analysis of species records and habitat designations to map Important Freshwater Areas and the critical importance of establishing Freshwater Networks of high quality habitats from which freshwater plants and animals can expand as part of the Nature Recovery Networks. We are uncertain about how this will be achieved in practice, given that 110 surface waters deteriorated by at least 1 ecological status class between 2015 and 2019. Section 2.2 of the Planning Process Overview document suggests this problem has been recognised by the EA with the statement that 'deterioration from one status class to a lower one is not permitted'. We wish to understand what steps will be taken to prevent this happening in future and what plans are proposed to remediate this recent decline in ecological status.

There still appears to be a lack of integration between WFD and FCRM team principles within the EA, such as taking a disproportionately risk averse stance to small changes in the hydrology of floodplains [without risk to property] - which arguably is what needs to happen in order to meet WFD and several of the principles listed. This juxtaposition makes it difficult, time consuming and more costly, to deliver on measures and principles within the RBMP.

We would encourage a review of the EA permitting system to make sure it is still fit for purpose with regards to the listed principles that have evolved since introduction of the 25 Year Plan and to streamline it (quicker, cheaper, extended list of exemptions) for catchment partners working on projects that meet the listed principles.

Objectives

2 Do you agree with the environmental objectives and targets in the draft plans?

Not Answered

Which, if any, objectives or targets would you like to see changed and why? :

Delivery of the RBMP objectives to improve the water environment is a multi-sector, multi-level (grass roots to government) plan and not one organisation is solely responsible for delivering it. From a Catchment Host perspective, we are very concerned about the reality of implementing the RBMP for the Ock (no doubt common to other Catchment Partnerships) due to the chronic lack of funding available from Central Government to achieve the RBMP objectives. Specifically:

1. Inadequate funding for Hosting the Catchment partnerships; whilst FHT represent excellent value for money, £7.5k p.a. (the Ock is considered to be 'half a catchment') is simply not enough to make a significant difference in securing the WFD objectives of raising 6 Ock waterbodies from their current 'poor' to 'moderate' ecological status and 7 from 'moderate' to 'good' by 2027 (1 by 2039); and
2. The severe lack of funding to work meaningfully on a catchment scale, in particular the reduction in WEIF for the whole of England from £15m to £5m from 2022, means it is very unlikely these targets will be achieved. Given the chronic lack of funding and the pressures from agriculture and development in the Ock, simply preventing further decline in waterbody status looks very challenging.

Catchment partnerships, when properly resourced, add value to integrating actions for water across sectors and organisations and we would argue that, as a collective, we have managed to "put a break on" to slow down the rate of deterioration of the environment; but it is still deteriorating, as evidenced in the RBMP classification cycles in 2015, 2019 and 2021 for ecological status.

What does 'aiming' to achieve good status for all water bodies mean? If it is suggesting that such a goal is not 100% achievable, then greater transparency and explanation is needed as to which waterbodies are unlikely to reach good status, and why, and how many of these there are likely to be.

None of the 13 water bodies in the Ock currently meet 'good' ecological status and it seems highly unrealistic that 6 can achieve this by 2027, as does lifting 6 out of their current 'poor' ecological Status. Although we would like to aim for this transition to Good Status, in practice it is not within our gift to

achieve this without very substantial increases in funding and major changes in the way the land is managed, developments are consented and planning obligations monitored and enforced, for example the maintenance of SUDs.

It is difficult to comment on whether the chemical status of all water bodies can be uplifted from 'fail' to 'good' by 2063 and whether this 41 year timeframe is meaningful due to the recent change in how chemical status of water bodies is measured.

Widespread challenges, such as high levels of development that is not water-efficient or the continuing diffuse pollution from agriculture, undermine improvements being made by catchment partnerships [and others]. These are examples of activity that can really only be overcome by changes in policy or mechanisms for delivering action by Government or at Regulatory level. We welcome the backing Government is giving to some aspects of aiding Nature's Recovery [e.g. through the Landscape Recovery funding schemes and ELMs], however we question why other changes [namely policy] are not being made in parallel to safeguard any improvements that may be gained on the ground from delivery of such schemes [e.g. water policy in the 25 Y.P. is weaker than the WFD and the Environment Act is overdue]

Without stronger policy to back up the actions needed for achieving environmental objectives in the RBMP [e.g. changes to national planning policy to mandate water efficient development across the South East] as well as stronger regulatory enforcement and sanctioning of actions that deteriorate the environment [e.g. via proper resourcing of regulatory bodies to investigate and use regulation powers] then we will remain on an uphill battle to meet the worthy, but unrealistic targets set in the RBMP.

NB** Though pollution is mentioned within the main objectives in different contexts, there does not appear to be an overarching objective towards preventing sustained or increased surface water pollution from Phosphate / Nitrate [i.e. non priority hazardous substances] and we would welcome addition of an objective to this effect.

Programmes of measures

3 Are you aware of any funded measures that are missing from the programmes of measures?

Yes

Please let us know what measures are missing:

Some of the measures / actions for the Ock Catchment appear to be missing from the confirmed (funded) list for RBMP 2021-2027. Whilst these are not funded by the EA, we thought it would be helpful to include these:

1. Building Oxfordshire's Freshwater Networks project; consolidating and extending the work started in 2021, with a £690,000 Green Recovery Challenge Fund grant (DEFRA) to protect and restore the Ock catchment's exceptional freshwater biodiversity.
2. Hinksey Stream project; restoration and monitoring of biodiversity and ecosystem service function in 3 valley head fens just West of Oxford and restoration of the Hinksey Stream within Oxford, thanks to a £100k grant from Thames Water

4 Do you have any comments on the potential new measures set out in the draft plans? Please tell us about any other new measures that could be taken forward with support from partners to achieve the objectives in the plans.

Fill your response in the box below:

Please include the Childrey Brook Floodplain Restoration project, which will create a wetland mosaic and create a connected network of clean water habitats at Manor Farm, Grove using £100k s106 funding from late summer 2022 onwards (awaiting final consents & funding confirmation), thanks to a £25k from the EA to develop the project.

In addition, FHT have submitted a request to the Thames Water Smarter Catchments evidence for £3.45m (scalable to £10m for greater intensity) to deliver a 10 year programme of Smarter Water Catchment in the Ock comprising:

- 1.Planning and monitoring effective interventions; establishing a 2-3 year baseline before implementing substantial biological and ecosystem service delivery programme to enable monitoring of success against Before: After: Control: Impact design
- 2.Co-ordinating, developing and funding new projects; substantial uplift in funds available to make an impact using established statutory, BNG, carbon and charitable foundation funds whilst developing novel funding such as FHTs new Freshwater Restoration Units
- 3.Working with landowners to develop site pipelines; investment in intensive engagement to scope out and prepare shovel ready projects to deliver catchment plan goals
- 4.Supporting the development of the Oxfordshire Freshwater Network; linking practical delivery, people and the planning system to protect existing freshwater hotspots identified as IFAs
- 5.Delivering ecosystem services; targeting natural flood management and water quality improvements
- 6.Communicating the importance of the catchment; engaging people to help them understand and value the multiple services provided by the water environment and the Smarter Catchment work to safeguard and improve provisioning

Catchment partnership pages

5 Do you have any comments on the challenges and measures suggested as priorities in your local catchment partnership's page?

Please give catchment specific examples and tell us where, by working together, more benefits can be achieved.:

The "challenges" spreadsheet highlights individual counts of reasons for not achieving good status, per sector, per waterbody. The main water management issues highlighted within the Ock catchment are:

1. Agricultural and rural land management - pollution and physical modification
2. industry - pollution from towns, cities and transport

The greatest challenge to the Ock is the manner in which non-urban land cover is managed, with current farming practice leading to problematic diffuse pollution from fertilisers and sediment run-off primarily from arable fields. Having said that, the scale of development planned within the catchment means that urban areas and their associated surface water run-off will become an increasingly important source of diffuse pollution. Abstraction is not currently a source of concern for water management issues in the catchment, but this may be adversely affected by the future development plans, for example the 15,000 households planned to meet Oxford's unmet housing needs by 2031.

If your response applies to a specific catchment partnership page, please select from list below (if it relates to more than one, please list them in your response above):

River Ock catchment

Updating the plans

6 Do you have any further comments on the draft river basin management plans, not covered by the previous questions?

Fill your response in the box below:

About you

7 Are you responding as an individual or on behalf of an organisation or group?

Responding on behalf of an organisation (please specify which organisation or group and include what type it is, e.g. business, environmental group, etc)

Name of organisation or group, if you don't want to leave the organisation name, please tell us what type it is.:

Freshwater Habitats Trust

If you selected other please specify.:

8 Contacting you about your response

Name:

Hannah Worker

Email:

hworker@freshwaterhabitats.org.uk

9 Please select which river basin district your response to this consultation applies to (you can select more than one or submit a national response by selecting 'England').

Thames

10 If your response relates to a specific management catchment, please select from the dropdown box below

mgmt catchment:

Vale of White Horse

11 Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

Yes

12 Finally, it would really help us if you let us know where you found out about this consultation.

Email from the Environment Agency

other way of finding consultation: