



Association of Rivers Trusts

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Mr Geoff Bateman
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Environment Agency
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Dear Geoff

It was extremely good to meet with you and your colleagues at Rio House and I am pleased to receive your welcome of the Rivers Trusts' commitment to delivering WFD in partnership for the benefit of the water environment in England and Wales. Thank you for providing the opportunity for the Association of Rivers Trusts to respond to the draft River Basin Management Plans published in December 2008.

Whilst most of our comments are to do with improvements to the draft plans they are designed to be constructive and helpful, offering proposals for solutions where we are qualified and able to make them. We would like to stress our support of the Environment Agency and our wish to work with you at all levels to maximise the benefits of the WFD over the coming 6 years and subsequent planning cycles.

We see Rivers Trusts developing a central role in delivering WFD Programme of Measures and continuing to provide a valuable contribution to improving and monitoring the aquatic environment. To this end we are encouraging as many of our member Trusts as possible to submit their own detailed responses focusing on delivery in those areas.

Yours sincerely,

Arlin Rickard
Director



where there's water there's life





Association of Rivers Trusts response to the draft River Basin Management Plans consultation

The Association of Rivers Trusts (ART) represents 35 Rivers Trusts and river improvement groups throughout England and Wales, with members in all 11 River Basin Districts¹. ART also enjoys the support of Afonydd Cymru, the national grouping of the Welsh Rivers Trusts, and our sister body Rivers and Fisheries Trusts Scotland (RAFTS).

Since 1995 the Rivers Trust Movement has spent in excess of £23m² (£2-3m per year) on delivering research, awareness raising and importantly physical improvements to the water environment. Employing over 30 environmental professionals and enjoying the support of over 5,000 active volunteers and 10,000 supporters the Rivers Trusts are one of the primary co-deliverers for Water Framework Directive Programme of Measures.

Rivers Trusts manage and promote over 350km³ of fishing and river bank through community 'Passport' schemes and 'adopt a river' programmes. The majority of Rivers Trusts, in common with ART itself, are Registered Charities and Companies Limited by Guarantee and as such are experienced in delivering public engagement and public benefit. From its formation as an environmental charity ART has placed the Ecosystem Approach applied at the catchment scale at the centre of its planning and development. The 12 principles of the Ecosystem Approach are appended to this document (Annex A). The Water Framework Directive represents a legislative expression of what the Rivers Trust movement has been working towards since its inception.

ART has strong working links with a number of organisations and networks throughout the UK. We have a National Partnership Agreement with the Environment Agency, are members of Wildlife and Countryside Link, the Blueprint for Water Coalition, and sit on the National Stakeholders Group for the Water Framework Directive. ART works closely with the Salmon and Trout Association, Riverfly Partnership, Wild Trout Trust, Atlantic Salmon Trust and the newly established Angling Trust and are supported by WWF-UK, the Esmeé Fairbairn Foundation, Worshipful Company of Fishmongers and the John Ellerman Foundation.

Whilst most of our comments are to do with improvements to the draft plans they are designed to be constructive and helpful, offering proposals for solutions where we are qualified and able to make them. We would like to stress our support of the Environment Agency and our wish to work with them at all levels to maximise the benefits of the WFD over the coming 6 years and subsequent planning cycles. We are currently working with EA colleagues to "refresh" our Partnership Agreement to ensure it is fit for purpose to deliver against WFD expectations and the PoM in particular.

¹ Number of Rivers Trust in each RBD; Anglian 2, Dee 2, Humber 4, North West 3, Northumbria 3, Severn 5, Solway-Tweed 3, South East 2, South West 2, Thames 4, Western Wales 4, (Neagh Bann 1). Full details in Annex B.

² Estimated from most recent accounts available

³ Trusts managed fishing / angling development schemes: Wye & Usk Passport & Booking Office: 220km; Westcountry Passport & Booking Office: 60km; Tyne Angling Passport: 35km; Go Wild in Eden: 27km; Trent Passport: 10km.

We expect to submit a further response later in the consultation period once updated classification and confidence level data has been incorporated into the draft plans. However we feel the final plans must:

1. Have more ambition for the first round than is in the current drafts, otherwise WFD delivery will not be achieved. The Rivers Trust movement can help to achieve that higher level of ambition.
2. Be clearer about the condition of our rivers and other water bodies in ways that are easily understandable to stakeholder organisations, and offer them clear means by which they can contribute to delivery.
3. Recognise that Rivers Trusts can be one of the primary co-deliverers for many Water Framework Directive activities, including public participation and consultation, monitoring, research, developing plans, raising funds and implementing Programme of Measures.
4. Be more transparent about the use of derogations concerning time, technical understanding, feasibility or cost. Plans need to factor in the contribution that Rivers Trusts can make to overcoming these problems so that derogation can be quickly replaced by positive measures.
5. Seek to enable, not restrict, future work on catchment and river basin management and seek to develop a system capable of taking account of developments in science, technology, environmental condition, economic stimulæ and funding to deliver a dynamic and responsive WFD programme.
6. Use WFD planning and measures to influence land use, and drive changes in planning and legislation (such as Common Agricultural Policy reform, PR09, Local Agenda 21, Local Development Frameworks, Habitats and Flooding Directives) to solve problems at source. This includes the need to think big where appropriate and if necessary seek intervention to achieve the desired change.
7. Reflect the true breadth of measures possible to achieve WFD objectives, spreading reliance out from ECSFDI and Environmental Stewardship Agreements to incorporate the work of Rivers Trusts.
8. Demonstrate the vital nature of a good quality environment as a cornerstone to Sustainable long-term Economic and Social Development. We feel it is appropriate to highlight WFD Article 9.3 that stipulates the social and economic effects of cost recovery shall not prevent the “funding of preventive or remedial measures in order to achieve the objectives of this Directive”.

Association of Rivers Trusts

March 2009

1. Do you agree with our assessment of the problems in our water bodies?

DISAGREE

What would you change?

We do not believe that the assessment of Significant Water Management Issues in each draft plan expresses the true extent or range of issues facing the aquatic environment in each river catchment.

We feel a clearer approach would be to detail all the pressures affecting a waterbody, ranked according to perceived (or actual where evidence is available) importance and relative impact. In this way co-deliverers not only have the opportunity to raise issues at the waterbody scale, but also to address them. The current system of listing only those issues deemed as 'Significant' across a river basin district, often containing over a thousand waterbodies, risks masking serious but localised effects. One notable omission is the impact of hydromorphological pressures on water bodies. This is widely acknowledged as being one of the most significant pressures preventing the achievement of GES in the majority of waterbodies, yet it does not appear to be identified as a Significant Issue in the draft plans.

Once detailed assessment of all pressures on each waterbody has been completed it would then be possible to accurately rank the list of pressures in order of significance by the number of water bodies they affect, or better, the amount of rivers and catchments failing to reach GES due to their impact. If water body information sheets showed this assessment of pressures then both statutory bodies and local co-deliverers (such as Rivers Trusts and landowners) would quickly and easily be able to realise significant improvements to waterbody status at vastly lower cost than is required by more broad brush measures. Rivers Trusts are ideally placed to help identify pressures and opportunities, and to address them.

Greater emphasis should be placed on fish passage improvements, hydromorphological connectivity between water bodies in catchments and risk-based approaches to invasive species control.

A great number of waterbodies are affected by human activity, past and present, including many not categorised as 'heavily modified' in the draft plans. A strategic approach must be taken to address issues such as fish passage, hydromorphological connectivity (including geomorphological connectivity of sediments and transport pathways) and invasive species. The emphasis should be on working with partners and co-deliverers as a first step, rather than blanket regulation or measures.

We would draw your attention to the Moran Committee response to the Modernisation of Salmon and Freshwater Fisheries Legislation: New Order to Address the Passage of Fish consultation which highlights the need to consider wider implications of blanket powers relating to this issue.

There should be more monitoring and data collection relating to quantitative invertebrate assessment and fisheries, but that this should not draw funds from sources designed to implement WFD programme of measures.

We feel that there is inadequate data available to properly assess the biological condition and potential of many of the waterbodies. As part of the first planning cycle priority should be given to data collection and monitoring, carried out with partners such as Universities and Rivers Trusts, to enable constant and effective reassessment of the scale and exact nature of pressures facing water bodies. We should stress however that we do not see this as a 'measure' in itself, rather an essential tool to allow proper identification of issues and as a stimulus for additional actions. As such we would not like to see such work funded through any River Restoration Fund or other implementation funding source. We feel the government, in addition to making funds available for practical works, should seek to fund data collection using additional sources.

Water body information sheets are missing much of the relevant information.

We understand this will be addressed in part by updated monitoring data that is to be incorporated into the plans in April this year. However, in the version of the plans currently available information is missing on a great many water bodies (waterbodies 'not yet assessed': Anglian 28% [239/839], Dee 38% [43/112], Humber 26% [278/1064], Northumbria 33% [49/452], North West 29% [195/672], South East 27% [116/431], South West 35% [371/1075], Severn 16% [140/860], Thames 19% [108/571], Western Wales 39% [314/804], Solway – Tweed around 7%).

We hope to see virtually no missing information in the final plans as absent data does not help us, as co-deliverers, identify what is likely to be required to prevent deterioration, an important action is its own right, as well as possible actions for improvement. Where missing data is unavoidable we would like a clear statement to be made to that effect, detailing which data is thought to be most needed, to enable co-deliverers to offer additional data or projects to address that issue.

Failures are not sufficiently explained and interactions do not appear to be acknowledged.

For many waterbodies where current status is less than Good the information shows which measure(s) have failed to reach the target. However, in the case of composite measures (such as Fish) the detail of which species is/are failing to reach the target is not shown and needs to be included. This is essential if co-deliverers are to be able to plan and target measures to address failure without placing an undue burden on the EA by requesting additional information. It is also the case for a number of waterbodies that when species failures (again using fish as an example) are identified in detail it does not appear that inter-species interactions and holding capacities have been considered in setting targets (or at least the explanation of such isn't included). For example there are occasions where high populations of salmonids are present, but bullhead numbers are lower than target levels, leading to an overall failure of GES. It is acknowledged that salmonids in higher densities can displace bullhead therefore raising the question as to the potential of ever reaching GES.

Showing more detail would allow local interpretation of nationally derived data so that the inevitable errors due to local factors can be accounted for.

There is potential for the same issue to affect other composite measures, such as 'macrophytes' and the final plans would be more accessible to co-deliverers if they sought to show how possible interactions between species under the same classification 'group' have been taken into account when setting GES targets.

2. Do you agree with our proposed objectives?

AGREE

What would you change?

We agree with the objective for all waterbodies to be in GES/GEP by 2027 but we would like to see more work in the 2010 – 2015 cycle to reduce the amount needed in 2015 – 2027.

We feel the plans reflect a disappointingly low level of ambition in the first cycle which might be addressed at least in part by including Rivers Trust planned action and work in the Programme of Measures. We would urge the EA to actively seek to include details of Rivers Trust work in the final plans and seek their support as a cost-effective means of delivering GES. We would also like to see a greater level of detail relating to work beyond the first planning cycle and how it is envisaged that all waterbodies will achieve GES/GEP in 2027.

Alternative Objectives and Heavily Modified Water Body designations are used frequently, often without reasoning being shown.

We would like to see a reassessment and greater explanation of the way designations for Heavily Modified Water Bodies and Artificial Waterbodies are applied. We feel that there is a significant risk of missing opportunities to improve such water bodies where the physical modification extends to only part of the water body (for example only one bank, or only part way down the stretch.) It seems often the case that heavily modified water bodies contain a significant proportion of their length that is unmodified or modified to an extent that would not receive 'heavily modified' designation if it were a water body in its own right. By setting the lower target of GEP for whole stretches in this way the potential contribution of heavily modified water bodies to ecological status of the UK's rivers will be under-achieved. In addition the adverse impact of upstream HMWBs on non-HMWB downstream will lead to lower achievement of GES overall.

We suggest two possible methods for addressing this situation; 1) redefine sections of water body that are heavily modified as water bodies in their own right, leaving non-HM sections to achieve GES; or 2) Identify in waterbody information sheets exactly which sections of a waterbody are heavily modified, and why. Either measure will enable co-delivers and others to accurately identify what is responsible for a lower standard and then consider voluntary and other options to address the issues (actions which, if taken at a statutory level, would almost certainly be regarded as 'disproportionately costly'.)

3. For some water bodies we have proposed objectives with deadlines after 2015 or a lower overall target. Do you agree with these changes we have proposed?

DISAGREE

What would you change?

It is extremely difficult to agree with the proposed extended deadlines and/or lower overall targets in general due to a lack of information on how these decisions have been made.

The process is set out in Annex E but when it comes down to specific waterbodies, or even catchments, there is nothing to explain what measures have been appraised and how the measure (or measures) which are deemed 'disproportionately costly' or 'technically infeasible' were selected and then discarded. The same is true of extended timescales, where the reasoning behind a 2021 or 2027 target is not shown.

We would welcome clearer communication of the decision-making process as it relates to individual water-bodies and measures.

We would like to see the full range of measures considered for each waterbody, and how these have been analysed for cost-benefit and technical feasibility.

We would welcome the inclusion of all proposed measures for each water body with a brief assessment of why they have been rejected/accepted on the waterbody information sheets. For catchment-related actions the same could be shown in the catchment measures table.

Our aim in suggesting this modification is to allow co-deliverers to avoid wasting valuable time and effort (both theirs and the EA's) in suggesting measures that have come up before and been rejected as not suitable.

We are concerned that measures currently included do not take into account the full work programmes of many Rivers Trusts, and their costs for carry out such work. Generally Rivers Trusts have an excellent record of delivering high-quality work extremely cost-effectively and it would be to the benefit of the whole WFD delivery programme if the EA took proactive steps to engage with Trust work and aid its delivery. We are encouraging our members to respond directly to their dBMP with details of local and catchment measures in order to facilitate this process.

Technical solutions are constantly developing and we would like to see clarification in the final plans of how those measures deemed 'technically infeasible' in 2009 will be reassessed in coming years and future planning cycles as technology and methods move on. Rivers Trusts are at the forefront of developing and using novel techniques to address issues of high cost and technical constraints and we would not like to find ourselves in a position of being unable to apply these technologies due to out-of-date assessments in RBMPs.

Recent examples of Rivers Trusts' pioneering work and partnerships include the Eden Rivers Trust's RARE project, SCIMAP as used in the Eden and Yorkshire Dales Trust areas (soon to be rolled out nationwide), Tyne Rivers Trust's THIS-GIS project, Westcountry Rivers Trust's Cornwall Rivers Project



and Atlantic ARC project and the Thames Rivers Restoration Trust's three WFD demonstration projects in partnership with the Agency and others.

We welcome the provision of waterbody and catchment-related measures in a spreadsheet as this is the first step towards a user-friendly tool to allow local co-deliverers to access the plans.

This plan sets out the actions required to meet the objectives. To what extent do you agree that the right actions have been identified (actions that are proportionate and feasible)?

4. We have followed a process to assess (appraise) these actions. This process is described in detail in annex E. Do you agree with how we have done this?

DISAGREE

What would you change?

Not all measures have been included

We are concerned that a large number of measures, especially local M4 ones, have not been included in these draft plans. We would urge the EA to seek to include as many of these as possible before applying the Disproportionate Cost and Technical Infeasibility tests. We have listed our actions, which we feel could be included, in detail in our response to Question 7. In addition we are encouraging our member Rivers Trusts to offer local and catchment actions as part of their responses to the draft plans.

We welcome the provision of waterbody and catchment-related measures in a spreadsheet as this is the first step towards a user-friendly tool to allow local co-deliverers to access the plans.

We do not find the pCEA and Technical Feasibility process as set out adequately clear.

We support the RSPB's assessment that the pCEA as set out in Annex E does not fully explain the decision-making process. We would like to see Annex E contain a clear and understandable explanation of this process, including worked examples, so that it is possible for us and other co-deliverers to assess our potential measures for inclusion between planning cycles. We would also like to see which measures have already been considered and how/why they have been accepted or rejected.

We have the same concerns regarding the Technical Feasibility assessment.

Hydromorphology is only used to change waterbody status from High to Good.

We are concerned that the Ecological Status assessment pathway only incorporates hydromorphology in the capacity to grade waterbodies between High and Good status. We are not clear on why this is the case as we feel there is a strong case for the hydromorphological state of a river to be the defining factor in reaching GES for bad, poor and moderate waterbodies.

We believe that where a waterbody is hydromorphologically 'poor' then any changes to upstream land management (for example) may only have limited effect, possibly not enough to bring the waterbody to Good Status. For this reason WFD delivery should be addressing serious hydromorphological issues as a priority to lay the foundation for further ecological and chemical improvements.

We strongly support the creation of a River Restoration Fund and are actively assisting Defra in making the case for additional funds to the Treasury. The provision of significant additional government funds are essential and we are looking forward to working with all parties, the EA and Defra to help make the case to Government and then to deliver the funding programme.

95% confidence level to trigger action is too high.

We appreciate possible reasons for selecting 95% confidence limits as the appropriate trigger for action (it is an accepted statistical confidence level). However, when applied to WFD classification and measures we believe this level may be unobtainable in the majority of cases, thereby reducing the scope of actions available to improve water bodies. The monitoring network on which the classification has been based was primarily designed to assess point source pollution under the Urban Wastewater Treatment Directive, not catchment effects on waterbodies. We acknowledge the work the EA has done in the last few years to adapt its monitoring network to record ecological status but it remains the case that historic data was collected for a very different reason. This means that applying an ecological confidence to a series of primarily anthropogenic impact data sets will always lead to lower confidence than a specifically designed network delivering targeted results.

We would like to see the confidence trigger level for action lowered to reflect the lack of information and the need to act fast in the face of changing climate and growing pressure on our water resources.

We welcome the inclusion of the most recent data in characterisation and confidence assessments as this will go some way to addressing this issue. We would support continual updates of this sort throughout the RB planning cycle, not just at 6 yearly intervals. We hope the EA will look to Rivers Trusts and others to assist with both the setting of confidence levels and to perform the interim review of progress.

5. What comments do you have on these actions? Are there any actions we've missed, or any changes you'd propose?

It is extremely difficult in most cases to identify exactly which action (or measure) will have an impact on which water body, even where waterbody-specific actions have been identified they are shown in the draft plans in a table by catchment, leaving readers to try to match actions to waterbodies.

Whilst we support showing catchment-based measures (rather than River Basin level measures) the missing link between waterbody and measures is a fundamental one. Co-deliverers such as ourselves and Rivers Trusts are looking for ways that we can contribute to achieving GES at both catchment and waterbody levels. By not linking existing measures to waterbodies directly it is extremely difficult to spot gaps in delivery or areas where Rivers Trust existing (and planned) work will have a greater, often cumulative, effect on ecological status.

We welcome the provision of a spreadsheet showing actions/measures by waterbody but at this time it has not been released.

There are some extra actions that could be put in place if there were more certainty they would be effective. These are listed under scenario C, and we would like to know if you can help to make these actions happen.

6. What comments on Scenario C actions do you have, including any additional information you can supply about specific actions?

It has not been possible for us to go through every scenario C measure in each plan to make recommendations but we would draw your attention to responses made by our member Rivers Trusts in which they highlight both Scenario C measures and additional actions they are involved in. These actions will contribute significantly to achieving WFD objectives and, if included in final plans, could raise the level of overall ambition significantly.

We are concerned that too many Scenario B measures (and even Scenario C measures) appear to be activities that are already going on or are definitively planned. There appears to be a lack of novel or specific measures in the plans. We feel this is probably as a result of inadequate planning / consultation at the catchment scale and would urge the EA to engage with Rivers Trusts to address this issue.

It is also worth noting that Article 14 of the WFD calls for public participation in delivery of WFD and Rivers Trusts offer a significant and measurable level of public support and involvement. Rivers Trusts in England and Wales enjoy the support of over 5000 regular volunteers, giving on average 2-5 days of support per year, this equates to between 10,000 and 25,000 volunteer days per year, or approximately 30 working years. This is huge resource potentially available for WFD delivery.

7. What support can you offer, such as undertaking any actions or providing resources to help deliver more for your environment?

In the last 15 years ART and the Rivers Trusts have delivered in excess of £23 million worth of partnership based catchment management activities, the vast majority of which contribute to the objectives on the WFD. We will continue to deliver improvements on the ground where they are needed, supported by sound science and evidence, and following the principles of the Ecosystem Approach (the 12 Principles are set out in Annex A).

We would draw your attention to individual responses by Rivers Trusts where they set out their plans and offer these up for inclusion in the final RBM Plans. These represent the firmest offer of support we can make, given the uncertainty of our voluntary funding streams. Our membership is keen and able to meet any shortfall in delivery in their catchments and in particular the measures needed to delivery catchment scale work such as those defined by Eel Management Plans and Fishery Action Plans. In order to achieve this, our Trusts will be looking for an even closer working partnership and support from DEFRA's agencies.

We strongly support the creation of a River Restoration Fund and are actively assisting Defra make the case for additional funds to the Treasury. The provision of significant additional government funds is essential and we are looking forward to working with all parties, the EA and Defra to help make the case to Government.

Current ART Partnership Projects

Salmonid 21c. Salmonid 21C is an initiative to develop agreement on how we manage and conserve wild salmon, trout and sea trout stocks in the UK and Ireland in the twenty first century.
http://www.associationofriverstrusts.org.uk/projects/salmonid_21c/live-4/html/home.htm

ALFA. The **ALFA project** brings in over 1 million euros which is being invested by the European Union in the "Adaptive Land Use for Flood Alleviation" (ALFA) project on the River Eden and its catchment (Solway-Tweed RBD). ALFA in the UK is a partnership between Eden Rivers Trust, Environment Agency, Durham University and Association of Rivers Trusts. It brings together partners from five European countries to share ideas and expertise on reducing the risk of flooding in populated areas. The project will look at the effect of land use on flood and drought flows in the areas' rivers. It aims to identify additional ways of managing flood risk to the typical hard engineering solutions, such as creating wetlands for water storage. The project will run until 2013 when findings from the research will be put into practice to benefit urban areas downstream and protect wildlife in and around the River Eden.

Blueprint for Water. ART has been involved with Anglers Conservation Association, National Trust, RSPB, Salmon & Trout Association, Waterwise, Wildlife Trusts, WWF, and Wildfowl & Wetlands Trust in the preparation and, on 28 November 2006, the launch nationally of a manifesto for water under the title "Blueprint for Water" - 10 steps to sustainable water by 2015. In March 2009 the coalition launched a call for government to act on water policy called '2009: time to act'.
<http://www.wcl.org.uk/blueprintforwater.asp>.

Union des Terres de Rivières. Part funded by the EU Interreg C Programme, Union des Terres de Rivières (U.TdR) is an ambitious network of 24 partners across 10 member states. U.TdR members



have come together to share experience and knowledge on the impacts of society and land use on water. Using the EU Water Framework Directive and the Ecosystem Approach as key common points of reference, U.TdR partners seek to develop and implement sustainable environmental and economic measures for the benefit of all EU citizens. ART represents the UK and used our role to disseminate information and resources amongst stakeholders in the UK.

ART Partnership Projects starting in 2009

PINPOINT. ART will be delivering the **PINPOINT** project (Practical INitiative for Pollution Information Targeting) in partnership with the England Catchment Sensitive Farming Delivery Initiative (ECSFDI). PINPOINT will deliver national advisory training, tools and advice to Rivers Trust and other personnel as a means to build on ECSFDI's work by developing a qualified advisory base outside those currently engaged by ECSFDI (England Catchment Sensitive Farming Delivery Initiative). PINPOINT trained personnel will advise farmers and land managers on economically sound measures to reduce diffuse water pollution from agriculture (dwpa).

Trained personnel will be able to offer nationally accredited advice to land managers in river catchments through integrated farm resource plans for land use and fine sediment. The project will roll out a cost-effective web based template for integrated farm resource planning to encourage uptake of field-scale dwpa reduction measures. Dwpa measures and advice delivered by Rivers Trusts will be sustained through provision of guidance and tools for Rivers Trusts, including setting up angling passport schemes as a financial incentive for land managers. **'Passport', or voucher angling, schemes** have been developed by a number of Rivers Trusts to support and sustain river and catchment conservation work with land managers. ART will develop resources to enable the scheme to be rolled out by Rivers Trusts nationally, take advantage of opportunities for joint promotion and economies of scale, yet retaining local ownership and benefits. Resources will be developed detailing how Rivers Trusts can set up an Angling Passport scheme in support of farm-based dwpa reduction activities and will include templates for passport websites, brochures and tickets, PR & Marketing guidance, indicative costs, frequently asked questions and a link to existing Rivers Trust schemes through ART.

SCIMAP. ART will deliver Durham University's innovative **SCIMAP** risk mapping package to Rivers Trusts. Sensitive Catchment Integrated Modelling Platform (SCIMAP) is an innovative GIS model used to analyse the risk of diffuse pollution in rivers by looking at interconnectivity between land areas and runoff. The model is used to target sub-catchments, farms and even individual fields to offer practical advice about land management, buffer zone, nutrient budgeting and soil conservation. It has the power to locate diffuse pollution sources and issues on a scale to which farmers can easily relate. SCIMAP has proven benefits in dwpa in the Eden Catchment where land managers and the Rivers Trust have come together to address diffuse pollution through field-scale visualisation of the problem areas. Implementation of bespoke actions to address the specific circumstances rather than blanket advice or recommendations can then be given by trained advisors. ART will supply the SCIMAP model to the Rivers Trusts and arrange for its designers to train a number of Rivers Trust personnel in its theory and use. Rivers Trust staff will then be able to run the model for themselves and on behalf of other Rivers Trusts to assist dwpa measures planning throughout the UK.

Collabor8 is led by Westcountry Rivers Trust and is designed to develop, on a transnational basis, a series of locally delivered but interlinked projects, based on the tourism sector. The philosophy is of developing a series of businesses clusters that can become self-sustaining into the medium/long

term. ART is a partner along with Westcountry Rivers Trust (WRT) and will build on the success Angling Scheme “Angling 2000”, developed through the Cornwall Rivers Project EAGGF Objective One funding. This project opened access to private “fishing beats” owned by farmers. This enabled a value to be attached to the river, encouraging the land owner to take a greater interest in maintaining and enhancing the environmental quality of the river. The particular ecologies of fish and rivers promoted by WRT and Angling 2000 are valuable both in terms of what they contribute to the economy in financial terms and their more-than-financial benefits.

ART Partnership Projects in preparation

ART is currently engaged in a number of partnership bids to various European funding programmes for projects that support WFD objectives. These could be classified as Scenario B or C as they are awaiting confirmation of funding but will definitely happen if the applications are successful.

- **Living North Sea** is a €6.3 million collaboration between 14 partners from six countries in the North Sea Interreg region. The project is led by the Association of Rivers Trusts, a UK NGO Charity, in a working partnership with the Environment Agency for England & Wales and CEFAS, an Executive Agency of DEFRA. The partnership will collaborate with all user groups through the construction and querying of a unique environmental database across all North Sea countries. Key to this will be a GIS-based analysis of spatial data, stakeholder participation and communication using Internet based mapping and information systems. This means that data on migratory routes, populations, innovative solutions and the consequences of management actions will be easily visualised and acted upon by partners and external interests and influence future policy. Longstanding this internet resource will be available for other future North Sea Developments, such as grid studies, shipping routes, fishing pressures, location of offshore and inland developments. The output is not a website it is a permanent management tool connecting scientists, policy makers, industry and communities for long-term sustainable development. This partnership will provide a permanent structure for collaborating on migratory fish issues in Integrated Coastal Zone management and policy throughout the North Sea region beyond the lifespan of this project.
- **Water Project** an Interreg IVA cross border project led by Westcountry Rivers Trust with ART and the EA aims to develop a substantive English Channel wide cooperation network that identifies our shared common identities and problems and can deliver environmental restoration of wetted land within a river catchment in a cost effective way and so meet the aspirations of the WFD. The project will also develop a set of five robust cost/benefit guides that demonstrate how investment from private companies in catchment restoration can make a long-term impact on their profitability and competitiveness, in line with the Lisbon agenda, and ensure the sustainable development of the environment, in line with the Gothenburg agenda.
- **Trap** Interreg 4c – Led by U.TdR this project is policy related to land use and anthropomorphic impacts on water – application recently submitted
- ART are actively developing tools, training, QA and protocols for the surveying, gathering, storage and interrogation of GIS and other data, including invertebrates (in partnership with Riverfly life), fish and habitat to target, inform and monitor river restoration activities.

Any other comments you may have on this plan

8. Do you agree with our assessment of how climate change will affect the pressures on the water environment?

AGREE

What would you change?

The EA have clearly carried out much work on this subject and its inclusion in the final plans is essential. We feel that the key elements in climate change adaptation and mitigation are Temperature and Flow and would like to see greater emphasis placed on measures to gain greater understanding of these in the first planning cycle. The UK's current freshwater temperature monitoring regime is inadequate for detecting climate change impacts in our rivers yet this is a vital tool in ensuring they reach GES. We would like to see the EA and others develop plans and funding to address this in the first cycle of WFD.

We would like to see specific emphasis placed on 'climate proofing' river systems and providing adaptive measures that will restore habitats capable of providing refuge for biodiversity whilst it is forced to modify behaviour to survive in the face of changing climate. Examples of this type of approach have been demonstrated by Rivers Trusts for many years and include restoration of naturalistic river morphology to provide a range of temperature niches (e.g. river narrowing to increase water depth in over-widened reaches), tree planting providing shade; attenuation of overland flows and increased infiltration measures (e.g. upland grip blocking) to moderate peak and low flow extremes.

9. Do you have any other comments on this draft plan that you haven't already told us?

Reshape Liaison Panels into Delivery Panels to implement the Programme of Measures and drive forward subsequent rounds of River Basin Planning.

We feel the Liaison Panels' role in producing the draft plans has been valuable but by no means optimal. We would like to see these reshaped into Delivery Panels containing people and organisations who are committed to delivering the aims of the WFD.

Currently we feel there has been too much representation from sectors whose primary aim is to safeguard their own commercial interests, rather than actively working together to deliver a plan that maps out a way forward into sustainable use of water. This is partly a result of the poorly structured and time-consuming way the panel representatives have been asked to contribute on behalf of a 'sector'. The only realistic option for smaller groups to influence the plans had been through lobbying of their sector representatives who, through no fault of their own, often have insufficient expertise and/or time to communicate valid concerns and ideas into the discussions. This has been particularly true of the eNGO sector where one or two representatives on each Liaison Panel have been asked to gather input and communicate actions (often with an extremely short timescale) to a multitude of different groups. We are fortunate that some of the bigger NGOs such as WWF and RSPB have made time and funding available to facilitate this process but this serves

only to highlight the inadequacies of the system, where valuable funds that could be spent on practical enhancements are instead spent on meetings and travel.

We feel that in order for this first cycle of WFD to be successfully delivered, and subsequent cycles properly planned, Liaison Panels must reform into Delivery Panels made up of delivery organisations and their representatives. These should be given resources to call on experts to help guide local implementation and encourage the growth of a community of catchment enhancement projects and people.

Delivery panels should be structured from the catchment up rather than the basin down. There is insufficient knowledge of catchment scale issues through a regionally structured liaison panel, yet achievement of the objectives of the WFD will primarily need to happen in catchments.

Monitoring data and systems need to be improved

Monitoring data and systems used to determine ecological status are inadequate and do not reflect either the true condition or give enough indication of the source of problems. More emphasis should be placed on new methodologies which capture information on dynamic pressures as well as just chronic ones. Often the fish data is the only indication of an ecological problem in a waterbody where all other parameters are at a good – high status. This has often been incorrectly used to conclude that the biggest factors affecting fisheries are not water quality based when in actual fact, they may be acutely associated with water quality during flow events. Waterbodies that do not include biological data are generally shown to be at a higher status than those with biological monitoring. The inclusion of biological parameters in this data is likely to substantially change the waterbody status.

The use of risk assessments to influence the location and parameters used in waterbody monitoring has reduced the ability for monitoring to be used in a surveillance manner, unless failures in biological monitoring (and particularly fish) are used to target more in-depth investigation. Rivers Trusts may be used to improve the range and frequency of monitoring in catchments where they are active.

WIMBY is not user friendly and does not contain sufficient information.

Whilst we appreciate the provision of the 'What's in my Backyard' interactive mapping tool on the EA's website but we have found it extremely difficult to use in responding to this consultation. We realise that the tool is not being used for its original purpose and has limitations on what can be done so we would suggest the EA look into publicly available and open source mapping systems as an alternative.

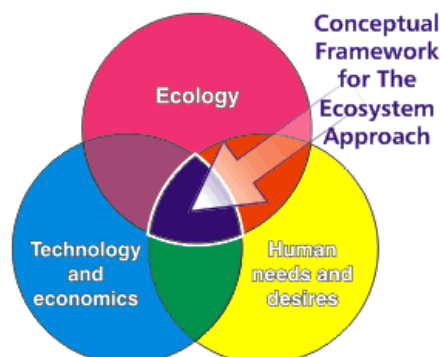
The specific comments we have are;

1. You cannot search by River Name, Waterbody name or Waterbody ID. This is frustrating as navigating from the plans to the map and vice versa relies entirely on waterbody details not postcode or place name. Other commercially available solutions such as www.streetmap.co.uk and the free Google Maps allow you to search by some river names.
2. It does not allow users to view detailed information on the data behind waterbody status. The data tables shown are less detailed than those in the plans and omit important information, such as fish species and age structure counts which would allow co-deliverers to identify and plan measures would have a beneficial impact.

3. Waterbody boundaries are not shown on WIMBY maps, this makes clicking on the right waterbody difficult and time consuming.
4. The maps themselves are small and unclear. In this age of high resolution digital mapping we are disappointed that the EA has not led the way in the application of free-to-use mapping technologies (such as Google Maps and Microsoft Live Earth) in displaying even the most basic of information (such as River Basin District Boundaries, which are almost impossible to see on WIMBY)
5. All data layers are displayed by default and revert back to this state after detailed results for a waterbody have been viewed. This makes interpretation difficult and slow as you have to deselect all the layers you don't want each time you change the map position of go into detail about a waterbody.

Annex A- Ecosystem Approach Principles

The following 12 principles are complementary and interlinked



1. The objectives of management of land, water and living resources are a matter of societal choice
2. Management should be decentralised to the lowest appropriate level
3. Ecosystem managers should consider the effects (actual or potential) of their activities on adjacent and other ecosystems.
4. Recognising potential gains from management, there is usually a need to understand and manage the ecosystem in an economic context. Any such ecosystem-management programme should:
 - (a) Reduce those market distortions that adversely affect biological diversity;
 - (b) Align incentives to promote biodiversity conservation and sustainable use;
 - (c) Internalise costs and benefits in the given ecosystem to the extent feasible.
5. Conservation of ecosystem structure and functioning, in order to maintain ecosystem services, should be a priority target of the ecosystem approach.
6. Ecosystems must be managed within the limits of their functioning [natural limits].
7. The ecosystem approach should be undertaken at the appropriate spatial and temporal scales.
8. Recognising the varying temporal scales and lag-effects that characterise ecosystem processes, objectives for ecosystem management should be set for the long term.
9. Management must recognise that change is inevitable.
10. The ecosystem approach should seek the appropriate balance between, and integration of, conservation and use of biological diversity.
11. The ecosystem approach should consider all forms of relevant information, including scientific and indigenous and local knowledge, innovations and practices.
12. The ecosystem approach should involve all relevant sectors of society and scientific disciplines.

Further information on the Ecosystem Approach can be found in our [Environment](#) section of the ART website, or by clicking [here](#)

The Ecosystem Approach is a delivery tool of the Convention on Biological Diversity (CBD).

www.biodiv.org

Annex B - Rivers Trusts and River Improvement organisations in River Basin Districts (England, Wales and Northern Ireland)

RBD	Organisation	Total in RBD
Anglian	Cam Valley Forum	2
	Welland Rivers Trust Steering Group	
Dee	Clwyd and Elwy Conservation Trust	2
	The River Dee Trust	
Humber	Calder and Colne Rivers Trust	4
	East Yorkshire Chalk Rivers Trust	
	Trent Rivers Trust	
	Yorkshire Dales Rivers Trust	
North West	Lune Rivers Trust	3
	South Cumbria Rivers Trust	
	The Ribble Catchment Conservation Trust	
Northumbria	Tees Rivers Trust	3
	The Wear Rivers Trust	
	Tyne Rivers Trust	
Severn	Bristol Avon	5
	Bristol Living Rivers	
	Severn Rivers Trust	
	South East Wales Rivers Trust	
	The Wye & Usk Foundation (England and Wales)	
Solway Tweed	Tweed Forum	3
	Eden Rivers Trust	
	The Tweed Foundation	
South East	River Adur Conservation Society	2
	Sussex Ouse Conservation Society	
South West	Wessex Salmon and Rivers Trust	2
	Westcountry Rivers Trust	
Thames	Action for the River Kennet	4
	Thames 21	
	Thames Rivers Restoration Trust	
	The Wandle Trust	
Western Wales	Clwyd and Conwy Rivers Trust	4
	Pembrokeshire Rivers Trust	
	Teifi Rivers Trust	
	The Carmarthenshire Rivers Trust	
Neagh Bann	Ballinderry Fish Hatchery Trust	1