



CONSULTATION RESPONSE

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Draft River Basin Management Plans Consultation

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About the Association of Drainage Authorities (ADA)

ADA is the membership organisation for drainage, water level and flood risk management authorities throughout the UK. Today ADA represents over 230 members nationally, including internal drainage boards, regional flood & coastal committees, local authorities and national agencies, as well our associate members who are contractors, consultants and suppliers to the industry.

Our purpose is to champion and campaign for the sustainable delivery of water level management, offering guidance, advice and support to our members across the UK, and informing the public about our members' essential work.

Consultation questions and our responses

1. What are your views of these [the RBMP] principles [to be followed when choosing future actions]?

- *take a collaborative place-based approach – align initiatives on water, and pool resources to achieve more than partners can achieve alone*
- *make evidence led decisions – work with partners to build the evidence base and use it to make evidence led decisions that are explicit about the intended benefits of actions and transparent about the assumptions used.*
- *take account of future and changing risks to delivery – in particular, the effects of climate change and population growth to make sure actions perform as intended over their lifetime*
 - *consider a range of possible futures (for example 2°C and 4°C temperature rise by 2100) and use flexible approaches that enable solutions to be modified in the light of changing circumstances or new information*
- *contribute to net zero – minimise greenhouse gas emissions and maximise carbon capture aiming for net zero*
 - *restoration of the natural environment offers the potential to deliver carbon sequestration as well as other benefits*
 - *many partners have already committed to ambitious net zero targets*
- *build catchments resilient to warmer water temperatures, more frequent floods and drought, and rising sea levels – choose measures that help natural assets cope with or recover from shock*
- *work with natural processes – where possible choose nature based solutions to protect and improve natural water assets and deliver multiple benefits*
- *promote restoration and recovery of freshwater, estuarine and coastal habitats and species – this will provide resilience to climate impacts*
 - *it may also sequester carbon and provide many other benefits for people and wildlife*

Summary:

ADA believes that water, in terms of quality and availability, should be a consideration in the development and revision of all policy and legislation going forward. Better integration and alignment of all policy, strategy and legislation will help to improve the chance that ambitious targets to protect, manage and maintain our water resources, and all which rely on them, can be met.



Much more can be done to better align measures to the river basin management planning (RBMP) principles and we set out below our recommendations (a-o) on how this can be achieved.

a) Always take a catchment based approach

We would like to see the adoption of a “catchment-based” rather than “place-based” approach. In ADA’s view this would better support collaborative working, pooling of resources and a more holistic approach to prioritising measures and directing resources across the whole catchment to maximise the benefits. The consistent adoption of this wording should help to instill the ethos across all processes and considerations.

Under the current place-based system, the lower reaches of our rivers do not always receive the management and maintenance attention due to the system of cost-benefit analysis applied. There are concerns about their conveyance capacities in times of flood and the condition of their protective raised embankments. ADA argues that using a catchment-based approach would give the principal lower stretches of our rivers the focus they deserve.

b) Improve funding opportunities for Internal Drainage Boards (IDBs) to deliver environmental measures and enhancements.

Land managers such as farmers have funding available to them to enhance the environment through schemes such as the Environmental Land Management Schemes (ELM). Other organisations who manage riverine and coastal environments such as the Environment Agency are centrally funded to cover the environmental priorities they identify. Internal Drainage Boards (IDBs) in contrast have a legislated duty to protect and enhance the environment but have no funding streams available to them specifically for the purpose of enhancing biodiversity.

Whilst most IDBs do not own any land other than at pumping station sites, under permissive powers, they do manage a vast network of over 19,400km of wildlife corridors in the form of watercourses and adjacent land and actively support habitats and species through their Biodiversity Action Plans. There are significant opportunities for these areas to be put to better use to achieve the environmental improvements needed and set out in the 25 year environment plan and the objectives of the RBMPs.

Accepting that the primary function of IDB watercourses is to manage flooding and water levels, IDBs are committed to maximising their ecological potential of these waterways but are limited to what they are able to achieve because of restricted funding opportunities. Access to more funding would give the opportunity for IDBs to install vegetated berms, to increase the room for water and wildlife within the river channel and would strengthen efforts already being made to tackle and better control invasive non-native species. It could allow for more fish and eel passes to be installed and allow IDBs to work with landowners to reduce sedimentation of watercourses which they would otherwise have to remove periodically via dredging operations at significant cost. IDBs also have the expertise, physical capability and will to assist land owners to restore floodplains and rivers or create wetland habitats and improved funding would allow them to do so. Improved grant funding could also help to fund the replacement of aging, inefficient pumps with more up-to-date, efficient fish and eel friendly versions which would also deliver carbon emission reductions. IDBs recognise the value of removing redundant river infrastructure which act as barriers to wildlife and will continue to progress projects which aim to do so. Where additional funding is made available, IDB’s can progress a greater number of these improvements.



IDBs may have greater opportunity to raise and ring-fence funding through their existing funding streams i.e. through Special Levy specifically for environmentally enhancing projects if IDB Special Levy was disaggregated from the local authority rate capping condition.

c) Natural vs. Engineered approaches.

It is clear that there is strong support for increased use of nature-based solutions such as natural flood management (NFM). The attraction of such approaches are their multi-functionality, providing a range of ecosystem services when carefully sighted and planned. Multi-functionality has been a concept that ADA has consistently promoted as part of a more holistic approach to managing water levels on a catchment-scale. There is an urgent need to move away from a binary attitude to flood risk management where either an engineered approach or a return to an entirely natural state must be taken. This way of thinking detracts attention and funding away from projects which could contribute significantly to environmental enhancement, but are disregarded due to their “engineered” elements.

Drainage channel watercourses such as those found in the Fens are an undervalued natural habitat. Whilst they may be engineered straightened channels they can still can be enhanced for the benefit of nature and the environment. The ‘Good Ecological Potential in Fenland Waterbodies’ guide details a suite of management techniques specifically for waterbodies of this type, designed to maximise ecological potential, water level and flood risk management concurrently. Techniques including berm creation and channel enhancement as detailed in the guide could be better supported through agri-environment schemes on a similar scale to hedgerow establishment and management. We need to better understand and address the barriers to supporting these techniques in such schemes.

Similarly, engineered spillways on embanked channels are a fantastic example of a blended approach to floodplain reconnection but rarely considered. Perhaps this is because the evacuation of water from floodplains only happens naturally in gravity-drained catchments, but we should not overlook the value of floodplain reconnection in the lowlands just because the inundation and evacuation of water is likely to require engineered and mechanical solutions.

More planned water storage on farms is very likely to need a significantly engineered means of getting the water in and out of storage areas but this could be part of the answer to restoring our over-abstracted chalk streams so should not be disregarded just because the solution is not “natural”.

Retrofitting and upgrading pumping stations with renewable energy-generating solutions and variable speed, fish-friendly pumps are multifunctional approaches which, alongside significant reduction in carbon emissions and biodiversity enhancements, could benefit the whole community if the surplus energy is made available to them. However, because such projects do not use approaches which mimic natural processes, they are often much less attractive for funding and are very rarely able to be progressed.

Engineered landscapes and solutions should not be “written off” or considered bad for the environment by default There are undoubtedly some locations where natural flood management has and will deliver all the required flood risk reductions and environmental improvements locally. In others, opportunities must not be overlooked to use NFM to support, complement and enhance engineered approaches rather than replace them, in order to maximise the huge contribution to environmental enhancement and the objectives of the RBMPs these areas can make.



d) Align initiatives on water – Flood Defence Grant In Aid Funding

To better align initiatives on water and to better contribute towards net zero objectives, we recommend that FDGiA funding policy is reviewed to better recognise the value of delivering multi-functional solutions which protect and improve water resources, freshwater habitats, our valuable agricultural land and reduce carbon emissions alongside protecting homes from flooding. Under the current regime, opportunities are being missed to make significant contribution towards the objectives of RBMPs, in rural areas in particular, through Flood Defence Grant in Aid (FDGiA) projects.

Recent geo-political developments are also signaling the critical importance of securing our native food production. The UK's RBMPs must recognise this situation by giving increased scoring to the protection of land valuable to food production through enhanced management and maintenance of our rivers and watercourses.

The current FDGiA “green book” cost benefit analysis scores an application for funding against a number of outcome measures such as number of properties protected (outcome measure 2), amount of habitat created or restored (outcome measure 4), and the value of land protected (outcome measure 1). The higher the score against these outcome measures, but particularly outcome measure 2, the more likely that funding will be granted and the higher the contribution to the overall project cost will be made. This means that large rural agricultural catchments with a lower density of properties, characterised by lowland pumped catchments, are much less likely to qualify for FDGiA funding for flood defence projects despite the significant contribution to improving and protecting water resources, freshwater habitats, improving climate change resilience and reducing carbon emission the project could make.

As an example, a typical rural pumping station which services a large but mostly agricultural catchment may have 1300 properties that meet the criteria to be considered “better protected” against outcome measure 2. However this number of properties would result in a low score against the outcome measure. The land in the same catchment could be some of the most productive high grade agricultural land in the country delivering many millions for pounds of agricultural benefit but the FDGiA cost benefits analysis counts only 6% of the “retail” value of that agricultural land against outcome measure 1.

The same application could propose to install new “fish-friendly” electric pumps as required by the Eel Regulations to improve the passage of fish and particularly the critically endangered European Eel. The score achieved by this benefit would depend on the length of watercourse where passage had been improved but would not be sufficient to qualify the project for funding without high scores against the other outcome measures. Even if the application also delivered significant improvements to many km's of channel through river restoration techniques it would still fail on this basis if other outcome measures scored poorly and priority would be given to applications which scored more highly against other outcome measures even if the freshwater habitat and quality improvements proposed by them were minimal.

CO2 reductions are a consideration within FDGiA applications. However, while applicants are expected to complete a complex carbon calculation to demonstrate that CO2 reductions can be made, the result, regardless of how much CO2 can be reduced, is not currently a scored element of the application.

This current policy does not support or prioritise action to address the widespread and significant water quality challenges in rural agricultural catchments highlighted by the RBMPs. It is also contrary to water resource and freshwater habitat protection and CO2 reductions being a primary government



objective and a legally binding commitment. ADA recommends that FDGiA funding policy is reviewed and changed to better recognise the value of delivering multi-functional solutions which protect and improve water resources, freshwater habitats, our valuable agricultural land and reduce carbon emissions alongside protecting homes from flooding.

Particular attention needs to be paid to how FDGiA will support and value biodiversity net gain provisions and other environmental net gain provisions as landowners and farmers necessarily diversify and become more involved with the new scheme delivery and management including conservation covenants.

e) Align initiatives on water – Flood and Coastal Erosion Risk Management (FCERM) Strategy and funding - Capital vs. Revenue funding

It is clear in the draft RBMPs that much use is proposed to be made of the significantly increased FCERM capital funding programme to support river restoration and natural flood management projects across most regions. However, it is vital to ensure that the creation of “new” infrastructure to improve river conditions and flood management does not detract attention and resources away from maintaining existing assets and channels in a good condition, now or in the future. It is imperative that existing channels such as necessarily heavily modified water bodies (HMWB) and artificial waterbodies (AWB) and those which are required to deliver a flood risk management function also receive adequate funding through the FCERM programme in order to maintain their condition but also to improve and maximise their ecological potential. Any new schemes should only be approved if the future maintenance and management funding needed to support the scheme over its whole life is fully considered, accepted and then included in the schemes’ long-term investment plans.

In recent decades, spending on flood defence asset maintenance appears to have been reduced in favor of capital project budgets, as set out in a recently published report commissioned by ABI and FloodRe¹. The report, which focused on embanked rivers, calculates that £568 million each year is saved each year in flood losses due to those embanked rivers “performing as they were designed to do”. But it also states that with a reduction in maintenance spend on these defences, deterioration rates increase. The report predicts that for every £1 extra that is spent on flood defence maintenance, £7 is saved on capital expenditure, such as reconstruction or replacement. The National Audit Office’s November 2020 report² on managing flood risk mirrored these concerns in its prediction that that the requirement for revenue funding is likely to increase as assets deteriorate more quickly due to climate change pressures and as capital investment growth results in more assets overall in need of maintenance. Research commissioned by the Environment Agency indicates that sea level rises, increased storm surges and river flows as a result of climate change are all expected to increase pressure on flood defence assets and this should be a consideration for all flood management approaches, both natural and engineered. The cost for flood defence asset maintenance and repairs could increase by between 20% and 70% a year as a result.

Capital projects have delivered new flood defences which have indeed delivered a greater level of flood protection to many areas. But without the necessary maintenance of connected watercourses, the effectiveness of capital solutions, including NFM to alleviate flood risk and deliver environmental improvements will be gradually and increasingly diminished where the interconnected river system is

¹ <https://www.abi.org.uk/globalassets/files/publications/public/flooding/modelling-the-impact-of-spending-on-defence-maintenance.pdf>

² <https://www.nao.org.uk/wp-content/uploads/2020/11/Managing-flood-risk.pdf>



neglected and deteriorates and climate change pressures increase. This is likely to have a negative impact on overall catchment condition status and will erode future budgets for improving the ecological potential of waterbodies which provide a flood defence function.

It is also recommended that the Environment Agency carries out a study to determine the annual costs of incident management over the past decade with a view to assessing if increased spending in operational maintenance activities could reduce future incident management costs.

f) Align initiatives on water – Asset Replacement Fund

The risk exposure to freshwater habitats, flood protection levels and to the wider environment through for example carbon emissions from operating aging flood defence assets was recognised in 2021 when the EA secured an asset replacement fund of £240 million pounds. To date, the funding is only available to the EA for improving their own assets that did not qualify for FDGiA funding. As mentioned previously in this response, improving one element of a river system to “gold standard” when all other interlinked elements are sub-standard will only diminish the benefit and effectiveness of the improved element and overall system. However this funding allocation has demonstrated that such asset replacement is feasible and valuable so should be extended to include the consideration of other flood defence assets regardless of their managing authority. This will help to deliver multifunctional benefits including improved fish passage and improved water level and flow management in contribution towards the RBMP objectives as well as carbon emission reductions.

g) Align initiatives on water – Environmental Land Management Schemes

With agriculture being a significant water consumer and contributor to freshwater pollution in the UK it is clear that water resource protection and conservation measures should be a strong focus for funding through the developing ELM scheme. With the extremes of climate change expected to bring more intense and more frequent rainfall, there is a strong likelihood for increased water pollution from sediment, nutrient and crop protection products through surface run-off and leaching. In recognition of this, ADA made a number of recommendations in its response to the ELMs consultation, and continues to seek input into the development and design of water resource focused approaches within ELMS to help to address these pressures and develop urgent solutions.

The developing Environmental Land Management Schemes are cited as a key mechanism to deliver multiple water quality and flood risk improvements but there is a disparity between the roll-out of the schemes and when the RBMP objectives need to be met.

Soil quality and water quality are intrinsically linked so it is hoped that the soil management incentives being rolled out this summer through the Sustainable Farming Incentive (SFI) will help to indirectly deliver some water quality benefits by 2027 by reducing surface water run-off and sediment erosion, reducing diffuse pollution and improving infiltration. However, measures to buffer watercourses which would complement and bolster such soil management improvements are not being rolled out until 2024 so the full potential improvements may not be realized by 2027. There are also concerns that the current SFI payment rates are insufficient to encourage widespread take-up of the measures which could have an impact on the contribution the schemes can make to achieving RBMP objectives.

The Local Nature Recovery and Landscape Scale recovery schemes within ELM could provide an ideal source of funding to help maintain, manage and restore rivers, coastal areas and floodplains back to a more natural state, provide flood alleviation and attenuation and improve on-farm water storage. For example, funding made available for a farmer to lower an river embankment to allow part of his land to be inundated in times of high flow, and then evacuated by mechanical means, reconnecting the floodplain and mimicking natural processes, could provide flood alleviation



downstream and slow flow velocities sufficiently to allow suspended sediment, a major freshwater source of pollution, to be deposited on the flood plain instead of accumulating in the watercourse. These river restoration techniques are attractive multi-functional options for funding and could help to provide improvements in some areas to hydromorphological, biological and physio-chemical river classifications. It is still unclear whether these approaches will be supported through these schemes and neither are due to be rolled out until 2024 so are unlikely to deliver significant benefits to river conditions by 2027 which is a missed opportunity.

We recommend the urgent prioritization of such measures through the 2 schemes and are very willing to contribute towards the development and design of such approaches through the ELMS development stakeholder working group and are actively seeking an opportunity to do so.

h) Align initiatives on water – Water Resource Management Plans

More has to be done to balance water resource availability both spatially and temporally as an equal priority to the improvement of water quality. In times of water surplus, freshwater is urgently conveyed away, either by gravity or pumping into our rivers and out to sea to avoid flooding. Yet often only a matter of weeks later, many areas are experiencing a water deficit where our ability to produce food and the environment can suffer. This situation is likely to increase in frequency and intensity in the future due to the weather extremes we are expecting of climate change. There are some examples where large sums of money have been spent on improving the water quality of a river to protect the biodiversity that lives within it to then see the river run dry.

ADA generally supports the principle of the regional Water Resource Management Plans (WRMPs) which water companies are now expected to provide and which aim to address this water balance. These WRMPs are key to coordinating activity and funding in water resource and environmental improvement programmes which are traditionally considered to be separate. The approach is likely to reduce the overall level of investment and efficiency required to achieve the required outcomes and ensure that the benefits can be spread more widely, across sectors and across the landscape.

As an example, the Water Resources East (WRE) Resource Position Statement recommends additional multi-sector water storage and water transfer networks be established in the fens of eastern England in order to meet the future water demands of all local stakeholders including residents, farming, industry and the environment. Where water transfer networks have previously been thought of as underground, piped networks, one of the WRE concepts centres around the beneficial contribution which pumped open water networks such as those operated by Internal Drainage Boards and the Environment Agency can offer to water transfer schemes and water storage as well as flood alleviation, navigation, tourism and the environment across the region.

Water transfer and water storage may be key to securing our future food production and protecting our riverine environment, particularly where variations and restrictions on abstractions have been made to protect the environment and improve the status of waterbodies which were failing overall due to poor flows.

Unfortunately, the results of the latest round of AMP funding awards to water companies served to discourage partnership working through spending constraints placed upon the water companies by OFWAT. It is hoped that a different stance will be taken for the next AMP review period.

i) Align initiatives on water – Biodiversity Net Gain

We noted that the recent biodiversity net gain (BNG) consultation policy document set out that actions and measures within River Basin Management Plans can be used to achieve biodiversity net gain. A robust mechanism will be needed to ensure that such measures are considered on a catchment scale and will require consent from the relevant Internal Drainage Board if action is planned within an internal drainage district.

ADA would welcome more detail and guidance on this approach and to understand how any biodiversity credits or funding from their sales could be counted in applications for or otherwise



integrated with FDGiA funding in terms of the environmental outcome measures and partnership funding calculations.

j) Align initiatives on water – Local Nature Recovery Strategies

ADA supports integration and alignment of RBMP objectives with the developing Local Nature Recovery Strategies (LNRS). This will be necessary to ensure stakeholder collaboration in order to agree and align priorities for action within catchments and across the strategies and to encourage resources to be pooled to achieve maximum benefits. Consideration must be given on how to integrate and align these and other strategies efficiently and so that the administrative burden on public authorities to maintain compliance is minimised. This will be particularly relevant where RBMP regions span a number of LNRS districts. ADA will welcome more information on how this is to be achieved.

k) Align initiatives on water – Species Conservation Strategies and Protected Sites Strategies

ADA supports integration and alignment of RBMP objectives with the proposed Species Conservation Strategies and Protected Sites Strategies. This will be necessary to ensure stakeholder collaboration in order to agree and align priorities for action within catchments and across the strategies and to encourage resources to be pooled to achieve maximum benefits. Consideration must be given on how to integrate and align these and other strategies efficiently and so that the administrative burden on public authorities to maintain compliance is minimised. This will be particularly relevant where strategies overlap with one of more RBMP regions. ADA will welcome more information on how this is to be achieved.

l) Align initiatives on water – Abstraction licence reform

Abstraction pressures from water companies and agriculture are frequently cited as one of the main challenges to a number of waterbodies achieving a good status. Whilst accepting the overall goal of seeking a more sustainable approach to the abstraction of water, ADA considers that the recent abstraction licence reform does not correctly and fairly address the issues or properly recognise other bodies, such as IDBs, who could assist in better managing water resources.

Looking to our neighbours in Portugal and Spain, the increased use of drip irrigation is being financially supported by Governments and is expected to reduce nutrient pollution, improve river flows and levels and deliver carbon emission reductions. ELM schemes and RDPE funding would be ideal mechanisms to support such initiatives in the UK.

Similarly, ELM schemes and RDPE funding should provide support for new and improved on-farm water storage which could be designed to be multi-functional from the outset i.e. providing a pre-determined capacity for flood attenuation with remaining capacity for agricultural use, alongside space and provision for wildlife. Water could be abstracted at times of high flow to ensure that impacts to water quality and river habitats are minimized and stored for use at times of low availability.

Initiatives such as the Felixstowe Hydrocycle Project are to be particularly commended and should be upscaled across the country.

m) Align initiatives on water - Water storage solutions.

It is concerning to note that there are very few measures which propose to improve multi-sector water storage, to better protect against the extremes of weather we are expecting as a result of climate change. This is not in line with the RBMP principles.

There are two types of water storage approaches which should be prioritised and supported; planned and unplanned water storage. Unplanned water storage is as a result of the urgent need to divert



diffuse overland flow or high flows within watercourses into pre-defined areas in a controlled manner, to alleviate flooding in more vulnerable areas downstream. The latter can take the form of washlands or flood attenuation areas. An important feature of these areas must be the ability to quickly evacuate water back into rivers following the unplanned flooding to ensure that the land can be returned to its primary function promptly. Approaches similar to these appear to be included in some regions as improvement measures within the RBMPs.

Planned water storage is a deliberate accumulation of water into a specified area, over a longer timeframe for example weeks or months, for use when demand is expected to be greater than supply. This could include on a farm scale in multi-functional storage reservoirs or on a larger scale in other multi-sector reservoirs and channels. These approaches feature much less frequently if at all in most RBMPs.

We urge the inclusion and prioritization of planned water storage measures if RBMP objectives are going to be achieved now and in the future. These approaches would be ideally supported through ELM schemes and the RDPE as they meet the required public goods for public money criteria and will be necessary if we are to maximise our resilience to a range of climate change extremes.

n) Public Sector Co-operation Agreements (PSCAs)

Public Sector Co-operation Agreements (PSCAs) have been developed to allow two public sector bodies to set out how they will deliver public tasks of mutual benefit together. Each agreement places both parties on a sound legal basis to efficiently deliver river and coastal maintenance works. The main objectives of a PSCA include securing efficient, cost-saving local working arrangements between public bodies which will achieve value for public money in delivering operational flood risk management activities and taking advantage of local skills and experience including local knowledge of geography, associated river/ drainage systems and operational practices, to benefit local communities.

ADA recommends the increased use of PSCA's between Internal Drainage Boards, Local Authorities and the Environment Agency in order to maximise these resource efficiencies. This could improve the opportunity to increase budgets which support RBMP improvement measures.

o) Evidence-led decisions

ADA is supportive of making evidence led decisions where they are considered holistically across all environmental priorities and on a catchment scale. For example, where sediment in river channels is allowed to build up in a certain area or flow restrictions such as fallen trees are left in-situ, it can reduce the capacity for water within the channel, presenting a real flood risk to surrounding communities. Evidence when viewed on a narrow scale may suggest disadvantages to removing sediment such as impact on the immediate species present, temporary water quality issues and poor cost-benefits in terms of reduced flood risk to the immediate area. However, reviewing evidence from a wider scale may highlight that the flood risk improvements to the upstream and downstream catchments, longer-term water quality improvements and benefits to other species outweigh the local short-term disadvantages.

There is a need to also better align technical approaches to assessing lowland fluvial systems so that there is a common consensus across the water level and resource management industry of what a "good" system and condition looks like. Once that clarity and consensus is achieved, it will be easier to encourage support for policy reviews and improvements of the funding mechanisms to support the work needed.



2. Do you agree with the environmental objectives in the draft plans:?

- a) *preventing deterioration of the status of surface waters and groundwater*
- b) *achieving objectives and standards for protected areas*
- c) *aiming to achieve good status for all water bodies*
- d) *reversing any significant and sustained upward trends in pollutant concentrations in groundwater*
- e) *cessation of discharges, emissions and losses of priority hazardous substances into surface waters*
- f) *progressively reducing the pollution of groundwater and preventing or limiting the entry of pollutants*

ADA is broadly supportive of the environmental objectives with the exception of the below principle.

WFD One-out-all-out principle – aiming at good status for all waterbodies

There is huge appetite and support for continuing to improve and protect our freshwaters across all areas of society as there is strong recognition of the ecosystem services they provide. Where that motivation and drive can be decreased is where improvements to watercourses are undervalued through the current “one-out-all out” principle. The principle requires a watercourse, which is often hundreds of miles long, to achieve a “good” score in all elements, everywhere, in to achieve a “good” overall status. But this approach does not serve to highlight the improvements which have been and will be made to waterbodies. Nor does it highlight those watercourses which may be deteriorating or continue to be unimproved. ADA believes that this approach discourages incremental improvements

This is best demonstrated by a typical watercourse with varied geography and a mix of rural, urban and industrial landscapes. The condition of the watercourse in all elements in the rural areas may be excellent but a small “heavily modified” section which cannot be rectified due to its flood protection function in the urban or industrial setting may lead to that entire watercourse failing despite the majority of it being in excellent condition. The unintended consequence of such a “fail” or lack of recognition can be the situation where the “excellent” sections of that watercourse are then neglected in favour of another watercourse where full compliance can be easily achieved. This is where a catchment-based approach over a “place-based” approach would deliver greater benefits.

The one-out-all-out principle is not supportive of the objective of the WFD to prevent deterioration of watercourses from their baseline status. We recommend that it is replaced with one which can better reflect the realistic limitations and potential of a watercourse relative to its other functions. We also recommend that, as is the case in the Netherlands, recognition is given to historically heavily modified watercourses which have a very clear flood risk or water resources function. Where a watercourse then meets its realistic maximum potential in each element taking into account its key functions, then it should be awarded with a good status in those elements and overall. This would potentially encourage more actions and funding from a wider range of interested parties.

3. Are you aware of any funded measures that are missing from the programmes of measures? Yes / No

Specific responses and recommendations concerning other funded measures are included in our responses to question 1.

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.

ADA is broadly supportive of the proposed other new measures, particularly the review concerning the beneficial use of dredged material. Existing rules applicable to the complaint uses of dredged silts



are often considered restrictive. There is widespread support for improvement of the opportunity to re-use dredged silts including where their nutrient content would confer benefits to agricultural land, replenishing soils eroded by surface run-off, or wind erosion and potentially reducing the levels of additional nutrient inputs needed. Improved support for greater use of more environmentally sensitive suction dredging work and lagooning of sediment, as undertaken on the Steeping River and South Forty Foot Drain would be welcomed. If a range of broader operational principles for re-using dredged silts could be established, maybe a lighter touch regulatory approach could be taken that would be beneficial to both conservationists and watercourse managers.

More specific responses and recommendations concerning other new potential measures are included in our responses to question 1.

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

Not applicable as providing comments on national approaches.

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

The new on-line hybrid HTML and excel format of the RBMP's are difficult to access and engage with. There is a need to have several screens open at once to view status alongside measures and it is difficult to easily identify a measure specifically linked to a challenge within a specific catchment. There is no further detail provided when clicking on the "details" link on the more information column in the RNAG tab. Information is held in separate files for the same water body and is presented in a very technical format.

In order to understand the full story, a user has to have the webpage open for the classifications of a waterbody, then open a spreadsheet which displays measures which as mentioned above don't easily link directly to any classification element and often only provide links to a number of other databases.

These RBMPs need to be accessible and easily accessible and understood by all stakeholders in order to attract support and improve partnership working. Information should be linked so that if an element is showing a poor classification in a specific waterbody, clicking on it should show the reasons why, and then further links provided should display what the proposed measures of improvement are so that the journey is easy for a user.

Finally, important questions remain about the hierarchy and interface between various plans and strategies and the need for national streamlining. ADA recognises that work is underway to review this aspect and welcomes further detail and guidance in this regard.