

Consultation

Response Document



43 Southgate Street, Winchester, Hampshire, SO23 9EH, UK
Tel: +44 (0)1962 868 626 | enquiries@cieem.net | www.cieem.net

**River basin planning: Challenges and Choices consultation
(Environment Agency)**

24 April 2020

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

Our Response

Climate and biodiversity crisis

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

Nature-based solutions must play a key role in mitigating against and adapting to climate change. Restoration of degraded peat bogs, flood plains and other wetlands is crucial to increase carbon sequestration and reduce the impacts of flooding, for example. Action must be taken to increase the resilience of ecosystems by improving connectivity and creating more space for nature. To this end, we see the provision for biodiversity net gain in the forthcoming Environment Bill as a key part in tackling the impacts of climate change on the water environment. In addition, the introduction of clear environmental flows targets that incorporate future climate change predictions and the needs of aquatic habitats and species is key to increase biodiversity resilience. To achieve these targets should allow for differences between water requirements of different waterbodies.

It is important to encourage the housing sector and linked industry to develop more eco-friendly houses, particularly with respect to water use. Although there appear to be relevant innovations available, they are not always implemented.

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

The EA should work with other stakeholders to resource and implement the Nature Recovery Network outlined in the 25-year Environment plan and ensure it has relevance to wetland, freshwater and coastal habitats. As noted in the Challenges and Choices document, this offers the opportunity to use a strategic, wider ecosystems approach to deliver multiple benefits.

Wherever possible, preference should be given to maintain the natural state of watercourses, reducing the use of grey-infrastructure, and encouraging the use of nature-based solutions and links to blue and green infrastructure.

Efforts should be made to improve baseline data on habitats and species through an Environment Agency (EA) led mapping scheme that focuses on freshwater, wetland and coastal habitat. These are not well covered in Multi-Agency Geographic Information for the Countryside (MAGIC). Most of the data are partial and often outdated. There is an opportunity to work with partners such as the NBN and LERCs to create a detailed resource.

The EA should continue to engage and educate landowners who have wetland, freshwater or coastal habitats on their land to ensure they are managed correctly and achieve a net gain for biodiversity. The 'public money for public goods' environmental land management scheme will be a step in achieving this, helping to tailor management to their specific circumstances.

As per the 25 Year Environment Plan goal 'Improving biosecurity to protect and conserve nature', the EA, should produce a budgeted plan, with realistic targets on improving biosecurity measures along their waterways, and liaison with landowners. This should include protecting native species, such as white clawed crayfish and water vole, while providing more stringent measures for eradicating American mink, signal crayfish and other non-native species.

We welcome the commitment to an inclusive and collaborative approach. The EA should work efficiently with other partners, such as Natural England (NE) to restore and create a wide range of wetland, freshwater and coastal habitats, ensure there are resources to achieve this, and that these are monitored effectively. To achieve this, the support of citizen science programmes could be valuable.

Similarly, in dispensing statutory functions during local plan development and arising planning applications the EA should work alongside Natural England and other stakeholders to ensure biodiversity net gain (BNG) leads to an increase in wetlands, freshwater and coastal habitats and wildlife. Also, working alongside Forestry Commission, Forest Research (FR) and NE the EA can map (at the catchment level) and support the creation of flood alleviation woodland (via the Environmental Land Management scheme (ELMs) and other mechanisms) that support component forest wetland habitats such as wet woodland, wet scrub and ponds.

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

Targets should be simple, measurable and underpinned by achievable interim targets. The EA must ensure that, where environmental targets are established, there are effective enforcement measures for missing these targets, such as fines, and stakeholders are well-informed about the need to achieve them.

We suggest the following targets:

Target 1: Make better training and information on soil protection available to landowners (especially farmers) including maintaining good soil structure, preventing surface run off and erosion into wetland habitats. This target should complement measures outlined in the Agriculture Bill which contains targets for soil protection and carbon storage.

Target 2: Improve the condition of statutory (NNR, SSSI, LNR) and non-statutory (local wildlife sites) designated habitats relating to the wetland, freshwater and coastal environment, including priority habitats. The EA should have their own separate targets for freshwater, wetland and coastal habitat restoration (as a percentage) with a target date for achieving this. This would feed into the overall 25-Year Environment Plan terrestrial and freshwater target of: *'Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term.'*

Target 3: Establish a target for restoring freshwater invertebrate and fish populations (such as species of principle importance). These two groups are vital components in any aquatic ecosystem and are good indicators of ecological condition, water quality and quantity. These are already considered through the objectives of the Water Framework Directive (WFD) to achieve Good Ecological Status/Potential; however, the introduction of key species targets would support biodiversity and improve aquatic communities' resilience.

Target 4: Ensure that only essential development, i.e. for reasons of overriding public interest, is undertaken in floodplains and, where this is permitted, improve communication with, and information for, developers to achieve an overall enhancement of these important habitat and prevent severe financial consequences on businesses and occupants.

Target 5: Ensure that in the development of a Nature Recovery Network, specific targets are set for freshwater, wetland and coastal habitat increases and means of achieving this, providing for an appropriate proportion of the figure of *'500,000 hectares of wildlife habitat'* set out in the 25-Year Environment plan as this does not provide any broad habitat categories of what will be targeted nor how this will be achieved.

Target 6: Re-invest in community projects such as the Freshwater Invertebrate Network to engage communities to take action and stewardship of their local water courses. Communities are important in monitoring for non-native species, taking action where appropriate and reporting pollution incidents.

Target 7: Make sustainable drainage systems (SUDs) a mandatory requirement for existing residential and commercial developments. However, this should also ensure that these systems are designed for ecological condition, water quality and biodiversity, to achieve an enhancement to our network of existing wetland habitats.

Challenge 3: Invasive non-native species

4. What can be done to address invasive non-native species? If you have read the further information about this challenge, you may also like to answer the questions below:

There must be a coordinated and concerted effort to deal with invasive species in a strategic and carefully planned manner. Appropriately trained and competent invasive species management specialists need to be integrated into landscape-scale Invasive Non-Native Species (INNS) projects as

well as providing advice and management capability for Local Authorities, Highways England, Network Rail, private development companies and Local Action Groups.

There continue to be reports of retailers selling INNS, including those outlined on Schedule 9 of the Wildlife and Countryside Act. Therefore, enforcing restrictions on the sale of these is vital to prevent further escapes.

The EA should continue to work with landowners with watercourses on their land and recreational users of water including anglers to encourage best practice and application of the EA 'Check, Clean, Dry' principle.

Ensure that qualified individuals carry out eradication of INNS. Developers, landowners and land managers should consult with professions to ensure the correct approach is taken. There is currently a strong reliance on voluntary groups dealing with INNS which is a challenging task that needs to be undertaken by those trained and competent to carry out the work. There is a role for volunteer input, but it needs to be employed on a concerted basis linked to professional expertise.

We welcome the EA's emphasis on prevention. An effective and financially supported rapid response system should also be employed to prevent further spread.

The EA should work collaboratively with Local Planning Authorities (LPAs). The latter should well informed, have the appropriate knowledge base and understand how to eradicate or minimise the spread of INNS. Many LPAs do not currently have this internal expertise, particularly with regard to freshwater ecosystems.

The Invasive Alien Species (Enforcement and Permitting) Order 2019 came into effect on 1st December 2019, allowing for the enforcement of the EU Invasive Alien Species Regulation 1143/2014 on the prevention and management of invasive alien plant and animal species in England and Wales. It is vital that the implementation of this is fully resourced with better management measures for species that are not as well known, both emerging and established, in particular:

- Nuttall's waterweed (*Elodea nuttallii*)
- Giant hogweed (*Heracleum mantegazzianum*)
- Floating pennywort (*Hydrocotyle ranunculoides*)
- Himalayan balsam (*Impatiens glandulifera*)
- Curly waterweed (*Lagarosiphon major*)
- Parrot's feather (*Myriophyllum aquaticum*)

Where volunteering programmes are proposed to support invasive species management, there should be a requirement to engage professional invasive weed control specialists to ensure programmes are fit for purpose and to provide ongoing support and, where necessary completing work.

5. How would you promote Check, Clean, Dry to all recreational users of water, including those who are not in clubs or attend events?

The Check, Clean, Dry campaign could be promoted by:

- ensuring that leaflets and other information is available at popular recreational facilities, and through local planning authorities and other stakeholders

- reaching out to schools as part of encouraging an understanding and respect for environment
- giving out information on the precautionary measures, and risks associated with INNS, particularly near watercourses, the EA and local action groups could also give presentations to the relevant organisations
- developing a social media campaign alongside more conventional information provision in local media outlets, such as angling magazines, and on-site signage.

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

There should be no barriers to professional ecologists and environmental managers adopting good biosecurity when you are in or near water. They should be taking biodiversity precautions when working near water as routine, particularly where there is a possibility of passing INNS from one waterbody to another (e.g. during amphibian surveys). Many ecology consultancies have biodiversity protocols and in-house training for their staff. Likewise, the Property Care Association's Invasive Weed Control Group encourages its members to have biosecurity protocols, a topic included in the PCA's training and assessment.

However, those providing access to the general public, particularly at recreational facilities, as a minimum through seeking advice from the EA or other parties, should ensure that:

- they are providing and promoting the use of appropriate facilities e.g. accessible tap with a hose, and a wash down facility area with suitable drainage; and
- biosecurity measures in all boating and angling related activities and events, or other facilities working near water.

Prohibitive cost and lack of free public facilities is a barrier to adopting biosecurity measures to many. Where this is the case, there should be investment in working with other sectors to ensure that these facilities are available. Practical steps that can be adopted by all individuals are key to prevent the spread of INNS.

We should all do our part in raising awareness of the issue of INNS and promoting good practice to professionals working around water, recreational users and the general public.

Challenge 7: Pollution from agriculture and rural areas

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

The 'public-money for public-goods' based environmental land management scheme (ELMS) outlined in the Agriculture Bill provides an excellent opportunity to support land managers in reducing pollution from agriculture and protecting natural watercourses and habitats. This could also include providing information to target landowners in areas where this is a key problem. This could be developed through catchment management schemes

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

Advice on delivering ELMS should be consistent and of high quality, and interventions must work for individual land managers and their specific circumstances. There is an important role here for

ecologists and environmental managers and just now we do not see how this will be facilitated. Ecologists bring a range of skills including invertebrate and algal identification, ecological survey appraisals that agriculturalist and farm advisors do not possess. Environmental managers have competence in the likes of river restoration and wetland interceptor design and maintenance. These are specialist areas.

Delivering public benefits will need joined up thinking and meaningful stakeholder engagement so wherever possible, farms should be encouraged to work together across catchments, for example as seen in farm clusters.

Challenge 8: Pollution from towns, cities and transport

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

There are important benefits of early engagement with qualified practitioners to identify environmental opportunities and constraints on-site and within the zone of influence, thus allowing appropriate green and blue infrastructure proposals to be built into plans at the onset of the development design process, should be recognised and utilised.

It is valuable to achieve an integrated approach for both SuDS and green infrastructure, e.g. linking to biodiversity, landscape, air pollution and health and well-being, maximising overall gain.

It must be recognised that there will be occasions where it is not appropriate or possible to deliver all benefits of green infrastructure. For example, in cases when the provision of SuDS may conflict with a requirement to provide mitigation or habitat compensation for protected habitats and species. In such an instance, guidance should be sought from the River Basin Management plan and the wider context considered.

The use of nature-based solutions to help with pollution is essential and can have additional benefits for biodiversity, however, it should not replace action on emissions reductions in the first instance.

Who pays?

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

We support the use of the 'polluter pays' principle, as included in the Environment Bill. However, the ELMS scheme and other core funding from Defra also provide an opportunity to strategically resource improvements in the water environment.

The Environment Bill, with its provision for biodiversity net gain, is another instrument to achieve the protection and improvement of water quality. We presume that the EA is vigorously exploring how to achieve maximum benefit through this for freshwater, wetland and coastal resources.