

River Basin Management Plan Draft Update Consultation East Suffolk Catchments Partnership Response.

The East Suffolk Catchments Partnership, hosted by the Essex and Suffolk Rivers Trust, is the lead body delivering the Catchment Based Approach (CaBA) in East Suffolk. Our members include local farmers and land owners and representatives from conservation bodies, the Environment Agency, water companies, local government, industry and others. The Partnership is keen to work with the Environment Agency to deliver improvements to the catchment and we welcome this opportunity to help develop the processes and systems inherent within the Water Framework Directive to support this goal.

Question 1. Do you agree with the proposed changes to the river basin district and catchment water body boundaries and artificial and heavily modified water body designations?

In principle we agree with this process where it will simplify reporting and improve the delivery of WFD aims, although we are concerned that a significant number of small, tidally influenced (TRAC) waterbodies will be 'de-designated' and become 'non-reportable'. Many of these waterbodies are environmentally rich and provide a valuable range of ecosystem services such as; flood management, ecological habitats and recreational value. We need to be satisfied that the TRAC waterbodies will continue to receive the funding and resources required to ensure that they continue to provide ecosystem services. We also need to be confident that appropriate reporting systems are in place to monitor the physical and ecological status of these waterbodies.

We would like to see greater transparency regarding the methodology used to identify the TRAC water bodies and would not wish to see the extent of these areas increased in future WFD cycles. We would be interested to know for example, why the Hollesley Black Ditch is retained as a WFD waterbody, yet adjacent, coastal waterbodies such as the Butley River are no longer designated.

Although 43% of the water bodies in England are considered to be 'artificial' or 'heavily modified' (A/HMWB), the methodology for designating them is not transparent. The consultation document identifies a range of reasons why water bodies can be A/HMWBs, but the process for selecting them should be more transparent and consultative so that all parties can be confident that decisions are based on best local knowledge. We would like to be assured that there is a process for removing the HMWB designation if successful river restoration measures are completed in the medium term.

We are concerned that the Felixstowe Peninsular Crag and Chalk are considered to be a single groundwater body. The Crag is a shallow, minor aquifer in close continuity with surface waters which supplies local irrigation and occasional domestic needs. The Chalk by contrast is a deep, largely confined aquifer, supplying most of the area's public water supply demand. These aquifers are not in hydraulic continuity, both are exposed to very different risks and both would benefit from different improvement strategies.

The East Suffolk Catchment summary makes reference to the Felixstowe Peninsular Crag and Chalk but does not refer to the East Suffolk Chalk and Crag aquifer to the north of the Deben, both of which are significant in terms of public water supply and maintaining wetland ecosystems.

Question 2. Do you agree with the objectives proposed for the water bodies and protected areas?

Whilst agreeing in principle with the process of setting objectives, we are concerned that the status of a water body is determined by the worst scoring of the elements that make up the status assessment. This results in a scenario in East Suffolk where a large proportion of the catchment is currently at 'moderate' status (because of elevated P) with the objective of achieving the same 'moderate' status (because it is considered 'technically infeasible' to treat diffuse P pollution). The primary tool for reporting progress (particularly to non-technical users) is the coloured status maps. In a best case scenario, a map showing (no) progress from 'yellow/moderate' to 'yellow/moderate' could hide significant improvements to elements such as; biology, flows and quality, potentially undermining work carried out in the catchment. In a worst case it could divert interest, effort and funding away from potentially valuable initiatives and towards better scoring but less valuable improvements. In many cases it is likely to be important to work towards improving individual elements in a waterbody irrespective of whether this changes the overall catchment status.

We are not convinced that it is appropriate to consider the treatment of diffuse P as being 'technically infeasible'. Whilst it may not be feasible to reduce P to target levels within the given timescales, measures which work towards reducing diffuse P are still likely to be cost effective and valuable.

The majority of consultees do not have access to detailed information about the proposed water body objectives and the EA should make this information more widely available and accessible. The WFD process is extremely complex and we doubt that a non-technical audience can fully engage with it. We would like to see a better way of reporting and presenting information about catchment status which is both accessible and sufficiently nuanced to allow the reporting of individual elements.

We have concerns that the status of some water bodies has been assessed using limited data taken from a sparsity of monitoring points. This follows a reduction in the EA monitoring network over the past 5 to 10 years. We suggest that for a number of selected sites, where data may be questionable, a third party 'audit' of the classification and designations is undertaken by appropriately qualified experts in local interest groups, such as the Catchment Partnership. This would provide a wider ownership and greater confidence in the status assessments and also, potentially allow any misunderstandings and anomalies in the data and its interpretation to be corrected at an early stage.

We are concerned that since the shellfish directive was repealed, previously designated 'shellfish waters' such as Butley Creek are no longer protected.

Question 3. Where flexibility exists, should the priority be maximising water bodies at good or improving the worst.

The East Suffolk Catchment Partnership is strongly of the opinion that the priority should be to maximise the number of water bodies achieving good status. Many of the problems affecting waterbodies are as a result of activities taking place across whole catchments. We feel it is important to address these issues in a holistic way. This approach provides improvements across the whole catchment, benefitting both urban and rural areas. Focussing on the worst waterbodies is likely to result in a costly exercise in 'spot treating' issues in urban areas where benefits are less likely to propagate throughout the wider catchment.

A lowering of the criteria for Good status may enable funds to be prioritised more widely.

Question 4. Do you agree that the correct measures have been identified?

Deben Operational Catchment: We broadly agree with the measures proposed in the East Suffolk Management Catchment information summary, but we would like to see them prioritised, for example; the 'removal or easement of barriers to fish migration' is particularly important on the Deben where 14 such structures currently exist. We would also comment that although river flows are identified as a 'reason for fail' on the Deben, the summary does not include measures to 'improve the natural flow and level of water'. We understand that the EA currently operates river support boreholes which augment baseflows in the upper river and that these successfully mitigate against abstraction and water quality issues. We would expect to see these operations continued and therefore be included in the programme of measures for the Deben.

Gipping Operational Catchment: We agree with the measures detailed, however under 'improve modified physical habitats,' we would suggest that 'changes to operation and maintenance' would be an appropriate additional measure. The Gipping has numerous control structures and an inclusive and holistic approach to their management and maintenance, including key partners and landowners, is likely to be beneficial WFD measure.

The catchment supports an important public water supply intake at Sroughton. It is not clear in the Catchment Summary whether this intake and the associated drinking water protection area has been taken into account in the cost benefit analysis.

Coastal Operational Catchment: We agree with the measures identified although we would like to see some prioritisation. It is our perception that the measure to 'control the pattern and timing of abstraction' is critical to hydrological and environmental management in this area.

As a result of changes to the water body boundaries, large areas of important coastal habitat are now excluded from these measures.

Felixstowe Peninsular Crag and Chalk Catchment: We recognise that measures to improve the resource balance and quality of the Chalk are unlikely to be cost effective but we would question the assessment for the Coastal Crag aquifer. The aquifer is shallow and unconfined

and in close continuity with surface waters. Improvement measures, such as changes to land management or abstraction practices could have significant beneficial effects on both the water quality and resource balance within the aquifer.

Question 5. Do you agree with the way the economic appraisal has been done?

Local EA staff have briefed us on the economic appraisal process. We feel however that even with this briefing we are only partially qualified to comment on the way the economic appraisal has been done. We feel that without specific guidance, respondents will find it difficult to make an informed opinion on this process. Consultation responses from our Catchment Partners have confirmed this view.

We understand that a benefit to cost ratio of greater than 1 is required to take measures forward. We agree that the distribution of scores for the Suffolk Coastal (1.1), Deben (1.66) and Gipping (1.0) operational catchments is about right although we have some concerns about the score for the Felixstowe Peninsular Crag and Chalk groundwater catchment (0.26). These should be considered as two separate water bodies as measures appropriate to the Crag aquifer are likely to have a higher benefit cost score than the Chalk. In practice measures to address water quality and quantity issues in the Crag are considered to be economically feasible and are being progressed by the ESCP and the Suffolk Holistic Water Management project.

The East Suffolk Catchments Partnership is using ecosystem services mapping to help prioritise our initiatives and we welcome the fact that ecosystem services have been considered in the cost benefit analysis. We would question, however how this has been incorporated and we would recommend that the assumed benefits are 'ground truthed' by local experts.

Question 6. What measures can you deliver to help achieve the long term objectives?

Currently the ESCP is progressing a CPAF grant application to carry out a range of projects linked to the agreed WFD waterbody objectives: These projects were identified following extensive partner consultation and deliberation of a steering group. If funded, they will be delivered alongside and in co-ordination with other catchment initiatives to maximise benefits and reduce cost. In addition, as catchment lead, the East Suffolk Catchment Partnership will be continuing to raise awareness and championing the Catchment Based Approach (CaBA) including working with partners to progress schemes that are not within the CPAF process. It is clear that a consultative, partnership approach is key to progressing catchment improvements and a commitment to continued, long-term funding is essential to ensure that this approach remains viable.

Specific ESCP project proposals are as follows:

1. We will reduce the movement of diffuse agricultural pollution, particularly P and fine sediment into the upper Deben Headwaters by providing farmers with the knowledge and tools required to slow the flow of water off their land and trap sediment and agricultural pollutants. Farmers will be invited to a workshop and

offered free specialist on farm advice followed by the loan or provision of equipment and plant. The initiative will be targeted at farmers and locations which have been identified using the Partnership's ecosystem service opportunity mapping to be at the highest risk of causing water quality problems. Working with partners we will engage with 10 land holdings to provide land and water management guidance resulting in the construction of a minimum of 20 flow attenuation features which will have a diffuse pollution benefit.

2. The weir in the River Deben at Brandeston, will be removed and replaced with a series of riffles by March 2016. Downstream, a mix of carefully designed riverine features, such as riffles and pools, large woody debris, riverside planting and new backwaters will be created along a 3.5 km reach of currently over-managed watercourse. Existing aquatic and riverine habitats will be improved and new ones created, improving water quality and ecological diversity. Fencing will be installed at specific points where we know poaching to be a problem. The project will create and install ten in river features including back channels, channel realignment, in river features and tree planting. Two km of stock fencing will be installed at Ufford.
3. Issues of diffuse agricultural pollution and soil loss in the Sandlings will be addressed using a similar methodology and measures identified for the Upper Deben. We will carry out visits and deliver soil and water management plans for 10 priority farms. We will ensure implementation of key recommendations by the end of the CPAF project period and introduce at least 10 measures to reduce diffuse agricultural pollution. Fencing materials will be offered where appropriate.
4. Barriers to fish movement will be eased at Bramford and an existing back channel connected to the main river. Working with key partners we will restore and enhance a back channel at Bramford Bridge by March 2016. This will complete a project initiated by Suffolk Wildlife Trust and the IDB, put on hold due to lack of funds. The EA flow gauging weir on the River Gipping will be partially bypassed by this back channel restoration that will also create new river margin habitats.

In addition to these initiatives, we are working closely with the Suffolk Holistic Water Management project to help manage flooding and enhance habitats and water resources in the Deben catchment and if funds allow, work with the AONB and other partners to restore saltmarshes in East Suffolk.

Question 7. Do you have any further comments on this consultation?

The WFD appears to make a reasonably simple process; reporting on and delivering improvements to our river catchments, into something quite complicated and difficult. This complexity is reflected in the consultation document, which makes it largely inaccessible to non-specialists. This is contrary to the principles of the catchment based approach (CaBA) which seeks to place decisions about the management our catchments into the hands of the people who live and work there.

We would like to see a simpler, more accessible process and consultation.

E1. Do you have any comments on the economic scenarios.

Without a detailed understanding of the principles and methodology used to develop the scenarios, it is difficult to make an informed comment. We believe that it is unreasonable to expect the public to understand and comment on these scenarios.

Following a detailed briefing at the EA's Earsham WFD event we are able to offer the following comments:

Scenario 1 is clearly unacceptable in terms of its failure to meet WFD objectives. Scenario 3 is both unaffordable and provides poor value for money.

We believe that scenario 4 represents the optimum way forward, achieving a 'good' status for approximately 63% of water bodies (compared to 69% achieved for nearly double the cost for scenario 3). Scenario 4, however, excludes measures to improve to diffuse P (on the grounds of not being economically feasible). We feel that additional funding could be beneficially released for low cost measures to reduce diffuse P pollution.

E2. How could scenario 5 be developed to present a preferred option.

Scenario 5, (based on current funding) will only see around 30% of water bodies achieving 'good status' in 2021. This is worse than the baseline and represents a deterioration in status from the current position. We feel that this is insufficient progress and would hope to see more water bodies raised from moderate to good.