



Water for life and livelihoods

A strategy for River Basin Planning

CIWEM Response to Environment Agency Consultation – April 2005

The Chartered Institution of Water and Environmental Management (CIWEM) is the leading professional and qualifying body for those who are responsible for the stewardship of environmental assets. The Institution provides independent comment, within a multi-disciplinary framework, on the wide range of issues related to water and environmental management and sustainable development.

General

CIWEM is currently an active member of Defra's Water Stakeholder Group and organises an ongoing programme of national conferences on various aspects of the Water Framework Directive (WFD). In the past two years these conferences have had over 2,000 delegates and have helped to inform stakeholders about the issues concerning integrated river basin management. They have also offered the Agency and the Government the opportunity to reach further stakeholders with key information and messages. We will continue to organise conferences which work with Government, regulators and stakeholders to educate and garner views on the directive.

CIWEM considers that this document contains many fine words and we welcome its production. The Water Framework Directive requires the completion of River Basin Management Plans (RBMPs) by 2009. Thus there will be a considerable amount of work to be done over the next four years. Whilst the strategy document considers what needs to be done, there is no mention of whether the resources are available to do it – no outline budget plan or consideration of requirements for staffing discussed. This is a significant weakness compared to the open attitude taken in Scottish WFD documentation.

It is of great concern to CIWEM that there are not enough resources in terms of suitably skilled and experienced practitioners currently available. They can only be made available by planning and implementing a substantial training and recruitment programme. The current status of our ability to fulfil the needs of the strategy is summarised below.

Component of strategy	Current status	Comments
Overall plan	Under development	Subject of this consultation.
Understanding of technical issues in river basin management	We believe that this is poor	Reasons for this are given below
Availability of resources (people, tools, funding)	We consider that this is inadequate	There is a shortage of people competent in integrated river basin management. The poor status of understanding technical issues means that suitable tools are not available.
Availability of	We consider that	There is a lack of people trained in the necessary skills,

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required skills	this is inadequate	and a lack of adequately experienced supervisory staff.
Contingency planning	Inadequate	Need to recognise 'natural wastage' of staff and plan accordingly.

Reasons why the understanding of issues is poor include:

- 'Broadscale' 'integrated' planning for river basins is relatively new. It is far more difficult to address a wide range of complex issues than a single issue. There will inevitably be a learning process which may take several years.
- Practitioners are normally specialised in one aspect of water management (for example, flood management), and do not have skills in other areas. There are few practitioners who have experience in integrated river basin planning.
- In the past, most work has been at a detailed level. River Basin management planning requires a different (broadscale) approach. Very few practitioners have experience of broadscale analysis of whole River Basins.
- There is a lack of science to support integrated river basin planning. The main reason for this is that much of the science developed for water management is for application at a much more detailed level.

An associated concern is that the "clients" for RBMP, particularly the Environment Agency, are affected by this shortage of skills. This affects the Agency's ability to adequately assess the work needed, supervise the work adequately, and apply the outputs effectively.

Failure to provide adequately trained staff is likely to result in poor quality plans with little insight into catchment behaviour and the likely impact of measures. There are already examples of inadequate single-issue plans, where the primary reason for substandard outputs is the lack suitable resources and adequate supervision.

It is recommended that:

- An assessment is made of the resources needed in terms of suitably trained staff, experienced supervisory staff, and tools. The assessment should make an allowance for wastage.
- Appropriate MSc and other courses on River Basin Management Planning are implemented at Universities to cater for the need.
- Associated practical training should be provided including fieldwork to gain a practical appreciation of catchment issues.
- Skills should be developed at all levels to ensure that adequate supervision and guidance for junior staff is provided.

In summary, 'Water for life and livelihoods' is rather too broad a strategy and this disappoints us. Defra's Water Stakeholder Group has repeatedly stated that there is a need for a detailed plan at this stage in order that firm support can be given to the Agency's planned route forward. This strategy provides minimal detail with which stakeholders could approach Government and appeal for further resources (we would suggest that the Agency will require a high level of support on this front).

The key issue for the strategy is the actual delivery of the WFD – primarily at catchment level. Catchment cells need to be agreed and the delivery of good ecological status delivered on the ground by catchment officers. We would be concerned to see numerous staff positions created in order to micro-manage the strategy at the river basin level. Resources should be locally targeted.

The strategy fails to address whether or not the proposals are practical and achievable, and what resources and training are needed to achieve it. This concern provides the background to some of the specific consultation responses.

Specific Comments

2.2.3 We would hope that the "less stringent objectives" route to action will not become the norm when the underlying issue is a lack of resources. The Agency and the Government must be careful to note and correctly apply the distinction between disproportionate cost and lack of available funding. We welcome the acknowledgement that wider considerations, e.g. flood risk management, need to influence objectives, options and plans. This is a requirement for true integration and delivery of the WFD, especially as its objectives include helping to reduce the effects of floods and droughts.

2.3 We discuss the division of activities between national, district and catchment levels. Do you agree with dividing activities in the way we propose? If not, do you have alternative approaches to suggest?

The general approach appears reasonable. Some River Basin Districts have many small catchments with similar issues, for example the chalk catchments of south-east England. Whilst it is recognised that each catchment must be dealt with separately at a detailed level, we suggest combining activities for catchments with similar characteristics within a District because the issues faced in each catchment will be similar, and a consistent approach between adjacent similar catchments will be achieved.

2.3.4 We list proposed documents and reports. Do you have any changes to suggest? If so, please describe the advantages.

The list of proposed documents and reports looks logical. A key concern to CIWEM is how the understanding of catchment processes will develop and be disseminated to practitioners. For example, if the sediment input into a river system changes because of changed farming practices, how will the effects on morphology, water level regime, channel habitat and floodplain habitat be assessed?

We recommend that a national document is developed which provides a description of catchment processes together with tools for predicting impacts of future scenarios (for example, climate change) and possible measures. This information is currently not available to practitioners.

A document providing an understanding of processes could then be developed for each District. This might identify, for example, the major processes within a District (for example, how an aquifer that overlaps more than one catchment reacts to different abstraction regimes). This understanding of processes should feed into the design of the monitoring programme and the District Significant Issues report.

We also suggest the development of common tools, to encourage a common approach to RBMPs particularly with regard to the prediction of future change and the impacts of measures.

The integrated management of the coast is a vital part of achieving the objectives of the Directive and we note that Integrated Coastal Zone Management is mentioned in section 3.2.4, however it is unclear where the coast fits in with the list of documents and reports listed in section 2.3.4.

3.1 We consider integration of our planning activities:

a) Do you support our approach to further integration? Do you have alternatives? Please tell us about the benefits of these.

CIWEM supports the proposal for further integration. Further, we consider that integration must extend beyond the Environment Agency's plans. In order to achieve successful integration with other

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stakeholders, the other stakeholders should contribute directly to plan preparation and should be joint owners of relevant parts of the plan. For example:

- Water resource management decisions can cost water companies many millions of pounds. The water companies must therefore be in full agreement with the plan to avoid conflict later.
- Planning authorities must support measures that have land use planning implications, otherwise there is no guarantee that they will be implemented.

In terms of practical integration, lessons learnt from previous attempts at integration must be taken into account. Integration has often been poor in the past, partly because participants have not fully appreciated issues that are outside their area of expertise. Having said this, we are wary of the use of the term “within practical limits” when discussing integration of plans and activities. A solid commitment to good integration is very important from the outset, not just to ensure delivery, but to free resources and focus attention on one overarching strategy and plan.

CIWEM would like to see a timescale and strategy published to phase out the large number of single issue plans which should become an integral part of the river basin management plans. Otherwise there is a risk of a “battle of supremacy” over conflicting plans e.g. dredging/maintenance programmes on salmonid streams (flood management needs and fisheries needs being considered in isolation leading to plans that cannot be achieved).

b) Would you support the move to plans that encompass all water issues?

CIWEM considers that this is an ideal opportunity to closely integrate plans for all types of water as well as land management issues. However, we recognise that there are immense practical difficulties associated with this. We must first be sure that we are able to integrate activities and produce the required outputs. There is quite simply no point in doing something until we know it can be done well. Otherwise there is a danger that benefits will be lost.

For example, existing plans currently provide specific information for particular stakeholders. If the new plans do not deliver at least the same quality of information in an accessible format, the quality of water management will be reduced (and not enhanced).

Nevertheless, ultimately we would like to see a well integrated management plan which considers all issues pertaining to a given river basin in a holistic manner, and which is also well synchronised with other external planning process cycles.

c) Do you see advantages in continuing to produce some single-issue plans? If so, which ones?

Further to our comment above regarding quality of information, there should be a planned transition process between single-issue and integrated plans. The pragmatic solution may be that single-issue plans should continue until it can be demonstrated that integrated plans render them obsolete.

We would suggest that integrated plans should be produced in such a way that data on specific issues may be readily extracted from the main plan as required. This might be achieved by the use of appendices focussed on specific issues with action plans to achieve the integrated needs.

3.2 We look at how the strategy links to wider planning processes:

a) Do you think the groups of external planning processes reviewed are the key links for us in delivering Integrated River Basin Management? If not, please provide information on other areas of planning and how they relate to River Basin Management.

CIWEM agrees that these are the main external planning processes which should be considered in delivering integrated river basin management.

b) Do you have any comments on the sections about the different groups of activities?

i. Spatial planning

3.2.1 See response to 3.1 (a). Whilst the suggested approach is laudable it is not clear how decisions will be made. Water management is just one of many issues faced by planners. To ensure the RBMP measures are achievable, spatial planners should actively contribute to RBMPs (including planning issues that span more than one RBMP).

There is a fundamental problem of development on flood plains which the Agency has not yet been able to resolve. CIWEM is urging the Office of the Deputy Prime Minister (ODPM) to resolve this situation, and it is hoped that the revised PPS 25 will reduce development pressure on flood plains.

ii. Periodic Reviews of water company plans

3.2.2 It will be strongly argued by water companies that their contribution is far more complex than just following the periodic review process - water companies have a diverse programme of research that guides their work. This text makes their contribution seem trivial. We suggest that Water Companies should actively contribute to RBMPs and should be joint owner of the outputs.

In view of the vital link between water resources and water management planning, the suggested link via the five-year review is weak. We are disappointed that the strategy does not introduce the question of whether periodic reviews and river basin management planning could be better co-ordinated through the use of a 6-year review period. Indeed, a 6-year period plus indications for the next 6 years i.e. 12 years overall might be even more preferable. For water resources planning Defra and Ofwat must move on from a 5-year timeframe where longer-term considerations are not given enough attention. 6 years plus 6 'indicative' plus 12 'prospective' i.e. 24 years ahead in total may actually be necessary, especially where new resources need to be developed. The Agency should be noting how these kind of proposals would aid the overall delivery of the WFD.

iii. Biodiversity plans

There is a need to understand biodiversity over a whole River Basin. At present we consider that the science in this area is weak and more work is needed to understand the processes by which catchment biodiversity is enhanced.

v. Rural land management

3.2.5 Changes to agriculture are effectively out of the hands of the Agency. We feel that the river basin management process is too weak and underfunded to deliver significant benefits, and the main driver for the WFD will be reform of the Common Agricultural Policy. It is important that changes in land management are demonstrated to be effective before any attempt is made to implement them. With this in mind, the new EC strategy group on WFD and Agriculture, formed in 2004/5, will have an essential role in considering ways in which reform in the farming sector can tie in with environmental benefits, as there is currently a lack of scientific knowledge on what constitutes 'catchment-sensitive' farming.

We consider that the Agency should be seeking further funding from Government to effectively take forward initiatives to ensure that 'good ecological status' is reached for all waters by the deadline. CIWEM and other members of the Defra Water Stakeholder Group are keen to lobby so that there is further resourcing of the Agency.

4. We present our approach to working together:

a) Do you agree with our proposed approach for working together?

The general approach to working together appears to be laudable. However, the practicalities of effective and pragmatic approaches to 'working together' should not be underestimated.

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There is a need to identify truly successful approaches to working together, which have led to effective measures on the ground. The results of the Ribble pilot study should be reviewed in detail. One approach is to develop dedicated RBMP teams with an understanding of river basin issues, with members from the Agency and key stakeholders. Such a team would be able to proactively direct the planning process and decide how working together could be achieved to optimise effort.

4.1 (1) CIWEM would like to be involved in the National Stakeholder Group; this would complement our role on the Defra Water Stakeholder Group.

4.1 (2) Local delivery of the WFD with partners is essential. A key problem is that, if there is no additional funding for implementation of the WFD, partners will not be able to deliver further benefits. Almost all local partners have restricted funds and need additional resources to deliver the Directive. An ideal model would be the numerous local positions part-funded by the Environment Agency, working with Wildlife Trusts and other non-governmental organisations.

4.1 (3) As noted above – the Agency cannot extend current partnerships and expect them to deliver additional benefits without the commitment of further funds and human resources.

4.1.1 In Scotland, committees have been set up to assist in the delivery of the Directive. We are concerned that the numerous current committees in England and Wales are clearly not able to be integrated and there will be a battle of wills to see who is most powerful. CIWEM suggests that the Agency should reduce the number of existing committees and replace them with some tasked with ensuring that the Directive is effectively delivered in the field.

4.1.2 We agree that a toolkit approach is a good idea, working with methods found appropriate in the Ribble Basin pilot. However, the comment that “we do not expect that all these methods will be used in all places” is more an indictment of resources than of real need. We are concerned that the Ribble Basin pilot is a “high-spec” project whereas in reality what will be delivered on the national scale will not meet the aspirations generated by its successes.

4.2 The arrangements for consultation listed are very brief. We would have hoped to see more detail on the methods the Agency plans to employ to deliver full public participation in the delivery of the WFD.

4.3 We are sure that almost all the stakeholders in the directive agree with the list of rewards, but CIWEM remains unconvinced by this strategy that the list will be delivered to deadline.

b) Are there any other matters concerning working together that you would like to see in this strategy?

The issue of how decisions will be made must be addressed. It is unrealistic to expect planning authorities and water companies to implement decisions made in an Agency-led plan unless they were deeply involved in plan development (see response to 3.1(a)) or have a statutory obligation to accept the decisions.

5. We present key success criteria. Are these appropriate? What alterations do you suggest?

The success criteria are aspirations and do not appear to be easily measurable. Criterion 3 refers to the use of science to set priorities, whereas CIWEM is concerned that much of the required science is not available.

We suggest that criteria are developed that are more specific and measurable (SMART). The following could form the basis of criteria that could be measured and monitored.

- More efficient use of water
- Provision of adequate water resources

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- No deterioration of the overall resource (quantity and quality)
- Improved surface water quality/reduced pollution
- Improved biodiversity
- Spatial planning that takes account of the water environment
- Improved flood management
- Stakeholder satisfaction
- Partnership development