



River basin planning 2021- working together consultation response report for England

Version 1

March 2019

We are the Environment Agency. We protect and improve the environment.

We help people and wildlife adapt to climate change and reduce its impacts, including flooding, drought, sea level rise and coastal erosion.

We improve the quality of our water, land and air by tackling pollution. We work with businesses to help them comply with environmental regulations. A healthy and diverse environment enhances people's lives and contributes to economic growth.

We can't do this alone. We work as part of the Defra group (Department for Environment, Food & Rural Affairs), with the rest of government, local councils, businesses, civil society groups and local communities to create a better place for people and wildlife.

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Foreword

Water is essential for life and livelihoods. It is a precious resource that we cannot live without. It enables nature to flourish, drives the economy and enhances our landscape. Water pollution and drought threaten these things.

We all have to play our part in maintaining and improving the quality and quantity of fresh and marine waters in England. We need to manage water properly to ensure that the needs of society, the economy and wildlife can be maintained over the long-term.

Rivers, lakes, estuaries, coastal areas, wetlands and groundwater provide many different benefits to society. Such as, supplying drinking water and supporting fisheries, to providing an essential resource to business, farming and recreation.

River basin planning provides an overarching framework for managing the water environment. River basin management plans include legally binding objectives to protect and improve rivers, lakes, groundwater and coastal waters, and a summary of the measures needed to achieve those objectives. Water and land are intrinsically linked so these plans inform decisions on land use planning alongside other strategies, such as flood risk management plans.

Working together is the first consultation in reviewing and updating the river basin management plans for 2021. The working together document is the statement of the steps and consultation measures that the Environment Agency is required to take in connection with the preparation of the updated river basin management plans under regulation 29(1)(a) Water Environment (Water Framework Directive)(England and Wales) Regulations 2017. Its purpose is to set out the steps and consultation measures in preparation for updating the plans. It also sets out the proposed timetable for reviewing and updating the plans, and the ways that everyone can get involved.

Executive summary

We published the current river basin management plans in February 2016. We have now begun the statutory process of reviewing and updating the plans, including three public consultations before publishing the updated plans in December 2021. These will reflect our understanding at the time about what is achievable, how and by when.

Working together was the first consultation in reviewing and updating the river basin management plans for 2021. The working together document is the statement of the steps and consultation measures that we are required to take in connection with the preparation of the updated river basin management plans¹. It ran for six months between 22 June 2018 and 22 December 2018. We asked if we had identified the correct steps and consultation measures, whether the proposed timetable was achievable, and the ways that everyone can get involved in preparing the updated plans.

We received 148 responses to the working together consultation, from a variety of groups and individuals, including the water industry, local authorities, catchment groups, local wildlife groups, and research organisations.

River basin planning draws together the aims, objectives and actions from many water related plans and strategies. So we asked whether we had identified the right plans and strategies.

You told us that we need to consider other plans and strategies, such as those relating to mine water, climate change, agricultural initiatives and protected areas. In particular, you highlighted the need for us to consider:

- How we work with local and combined authorities to ensure local development plans maintain or improve the water environment.
- That we make better reference to national marine policy and consider transitional and coastal waters more.
- That we consider the new drainage and wastewater management plans (DWMP).

We asked whether the proposed programme includes all the significant steps to review and update the plans. Most of you said that we had, but also referred to learning lessons from previous updates, cross-border working, and incorporating the natural capital approach.

We asked whether the timetable set out was realistic and achievable. Most of you felt that it was. However, following consultation we have made the decision to slow the current phase of work to update the river basin management plans.

As such, the challenges and choices consultation will now start 5 months later than planned in October 2019 (closing April 2020) and the consultation on the draft updated

¹ under regulation 29(1)(a) Water Environment (Water Framework Directive)(England and Wales) Regulations 2017

plans will now begin 4 months later in October 2020 (closing April 2021). The date to publish the approved updated plans stays the same.

We asked whether we are working with the right organisations that need to review and update the plans. You suggested some other organisations to consider. Where appropriate, we have contacted these groups and, if they have agreed, added them to our stakeholder lists.

Some responses referred to the Catchment Based Approach and catchment partnerships. These were both positive and negative. You recognised that catchment partnerships have made a very positive contribution to implementing an integrated approach to improving local rivers, but that the inclusivity and representation on some groups could be improved. We have raised this issue at the national Water Leaders Group and with the Catchment Based Approach National Support Group.

You also questioned the inclusiveness and effectiveness of the national Water Leaders Group. As a result, we will be conducting a review of its membership.

Finally, we asked whether, having read the consultation, you now knew how to get involved with reviewing and updating the plans. The majority of you stated that you did.

Contents

Foreword	3
Executive summary	4
Contents	6
1. Introduction	7
1.1. Objectives for this response document.....	8
1.2. Implications of European Union exit for river basin planning	8
2. Consultation on working together	8
2.1. Summary of responses.....	8
3. Summary of key findings and actions for England	13
3.1. How river basin management plans are linked to other plans and strategies	13
3.2. Our proposed programme of work and timetable	25
3.3. Who we plan to work with	38
3.4. Do you know how to get involved?	44
4. Summary of engagement for individual river basin districts	47
4.1. England (all river basin districts).....	47
4.2. Anglian.....	47
4.3. Dee	47
4.4. Humber.....	47
4.5. North West.....	47
4.6. Northumbria.....	48
4.7. Severn	48
4.8. South East.....	48
4.9. South West.....	48
4.10. Thames.....	49
4.11. Solway.....	49
5. Next steps	49
6. Appendices	50
6.1. River basin districts - England	50
6.2. New timeline and steps for updating the river basin management plans.....	51
6.3. Representatives on the Water Leaders Group [2018]	52
6.4. List of all organisations that responded	53
7. Glossary	55

1. Introduction

We published the [current river basin management plans](#) in February 2016. We have now begun the process of reviewing and updating the plans for 2021. This is a statutory process² and involves three public consultation steps. The statutory deadlines for launching these consultations are by:

- 22 December 2018 for the working together consultation
- 22 December 2019 for the challenges and choices consultation
- 22 December 2020 for the draft updated river basin management plans consultation

We will publish the updated plans in December 2021. These will reflect our understanding at the time about what can be achieved, how and by when.

Working together was the first consultation in the process of reviewing and updating the river basin management plans for 2021. It was launched 6 months before the statutory deadline and ran between 22 June 2018 and 22 December 2018. This consultation set out the steps and measures to be taken, the proposed timetable and the ways that everyone can get involved in preparing the updated plans. It sought views on:

- how other plans and strategies affect, or are affected by, river basin management plans
- the proposed timetable and content of the work programme to review and update the plans
- whether all relevant stakeholders have been identified
- how people can get involved in the review and update of the plans

We sent emails to over 3000 people and organisations inviting them to participate in the consultation. We also placed advertising notices in 10 regional newspapers.

The consultation documents were published on our website and we made hard copies available in all our principal offices in each river basin district.

We encouraged staff and partners to raise awareness of the consultation, and encouraged all to participate, at existing catchment partnership events.

For more information on the river basin planning process see the [working together consultation](#) pages.

² under regulation 29 Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

1.1. Objectives for this response document

This report provides summary information on:

- the number of responses submitted
- the types of organisation that responded
- how people responded

It also outlines how we are going to use this information to help us shape this cycle of river basin planning and how we will plan to engage and work with others in the future.

1.2. Implications of European Union exit for river basin planning

The Water Framework Directive (WFD) has already been fully transposed into domestic legislation. Therefore the obligation to review and update the river basin management plans is set out in our domestic law³ and these obligations will continue to apply. As such, we will review and update the plans which will be published in 2021 under the current set of WFD Regulations.

2. Consultation on working together

We would like to thank all respondents for taking the time to contribute to our consultation. We will use this information to shape the 2021 river basin management plans.

2.1. Summary of responses

We received 148 responses to the working together consultation, the majority of which were submitted via the web based consultation tool. Responses were received from a range of groups and individuals, including the water industry, local authorities, farming industry, navigation authorities, catchment partnerships, and local wildlife groups.

All the consultation responses that we have been given permission to publish are available publically on our [consultation page](#). You can find a list of all organisations that responded in Appendix 6.1.4. We are not able to publish comments that include personal details, names of individuals or offensive language.

³ principally the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

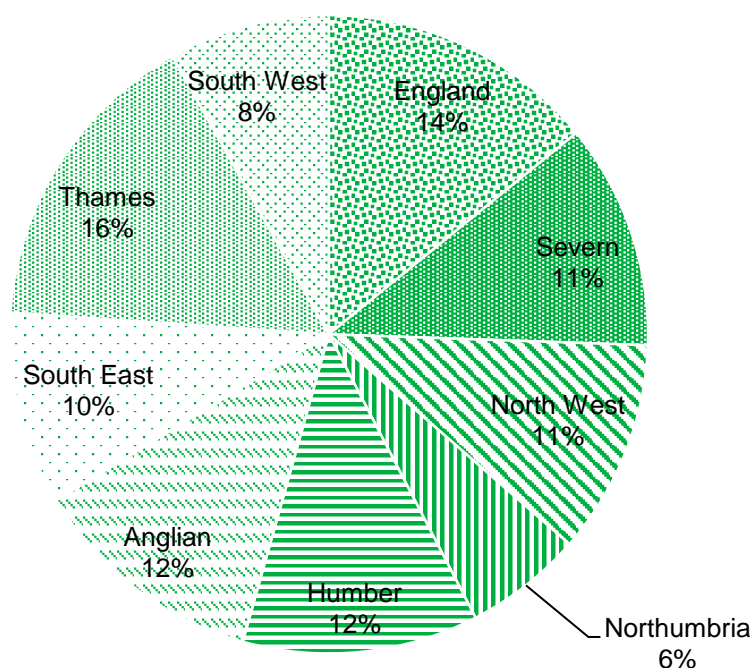
2.1.1. Summary of consultation details for each river basin district

The responses to the working together consultation cover a wide range of issues and locations. Some of which were relevant to the whole of England and others that were specific to a geographic area within an individual river basin district.

As summarised in the table below and Figure 1, 26 responses were submitted addressing the whole of England. The others referred to a specific river basin district. Note that some responses referred to multiple river basins therefore the total below is greater than 148.

River basin district	Number of responses
England	26
Severn	21
North West	20
Northumbria	11
Humber	22
Anglian	22
South East	18
Thames	29
South West	15

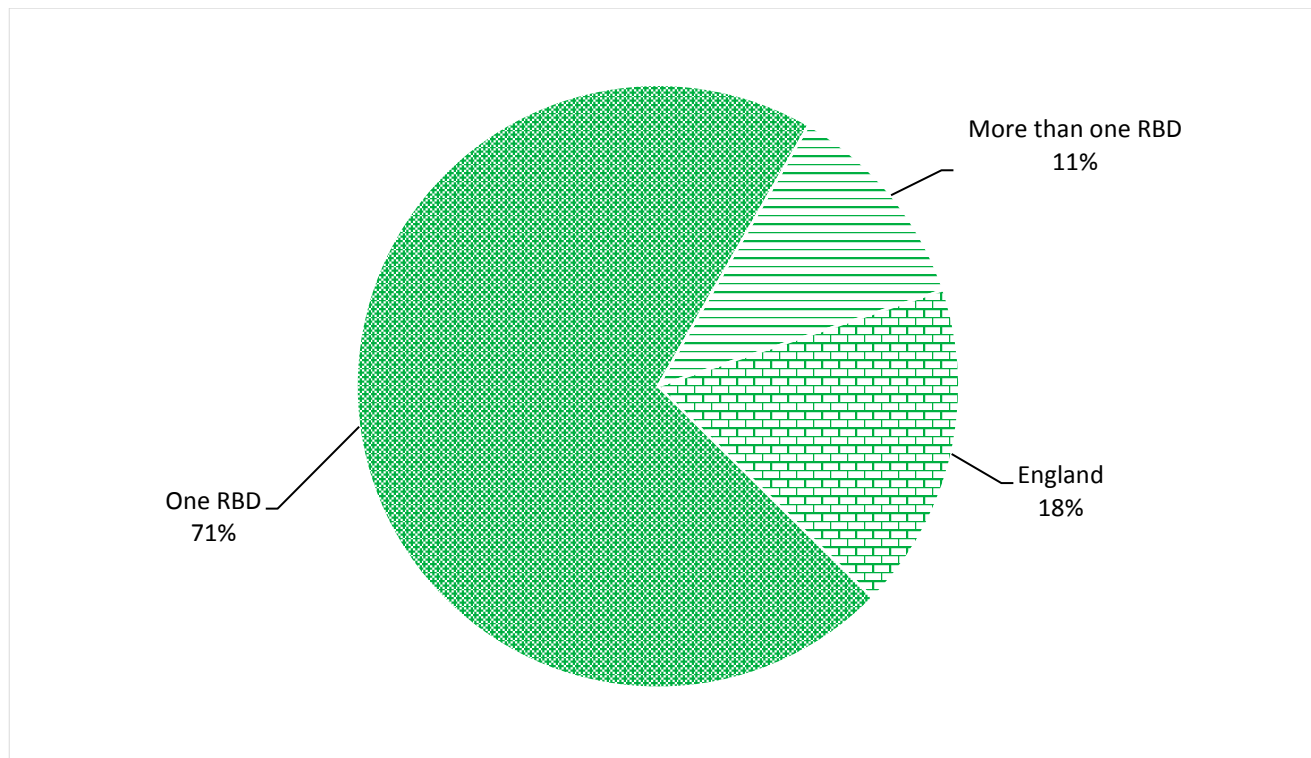
Figure 1: Response percent split by river basin district



2.1.2. Response type

The majority of responses (71 per cent) related to one specific river basin district. 18 per cent of responses related to England as a whole and 11 per cent of responses related to more than one river basin district (RBD).

Figure 2 Response type



2.1.3. How responses were submitted

The majority of responses were submitted online via the web based consultation tool. There were 14 responses that were emailed direct to us that we manually added to the web based consultation. No other form of response submission was used.

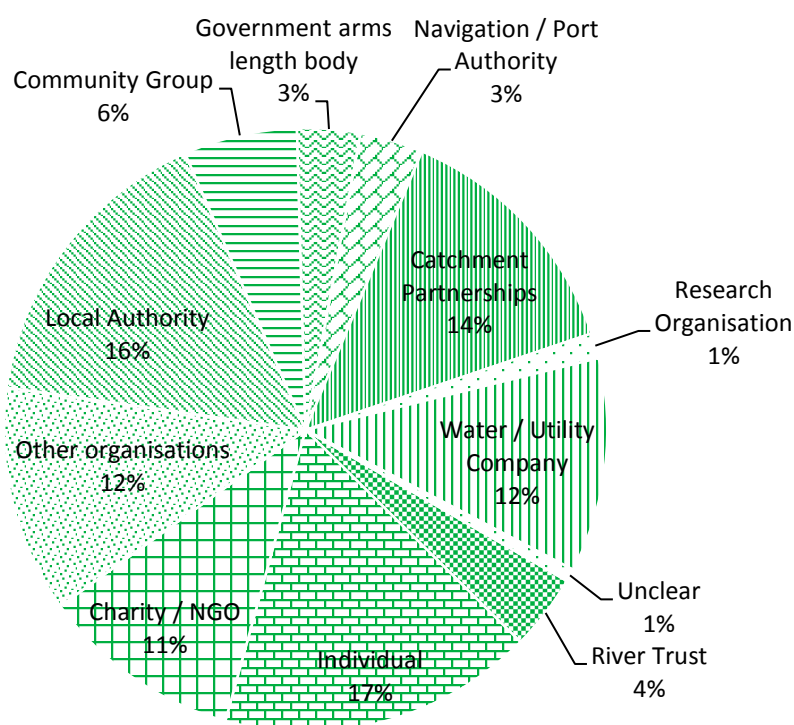
Format of response	Number of responses
E-consultation	134
Email	14
Meeting	0
Letter	0
Other	0
Telephone	0

2.1.4. Who submitted responses to the working together consultation?

The 148 responses received were from a wide range of both organisations and individuals. These are summarised below (and Figure 3).

Organisation type	Number of responses
River trust	6
Individual	25
Charity/non-governmental organisation (NGO)	16
Other organisation	18
Local authority	24
Community group	9
Government arm's length body	5
Navigation/port authority	5
Catchment partnership	20
Research organisation	2
Water/utility company	17
Unclear	1

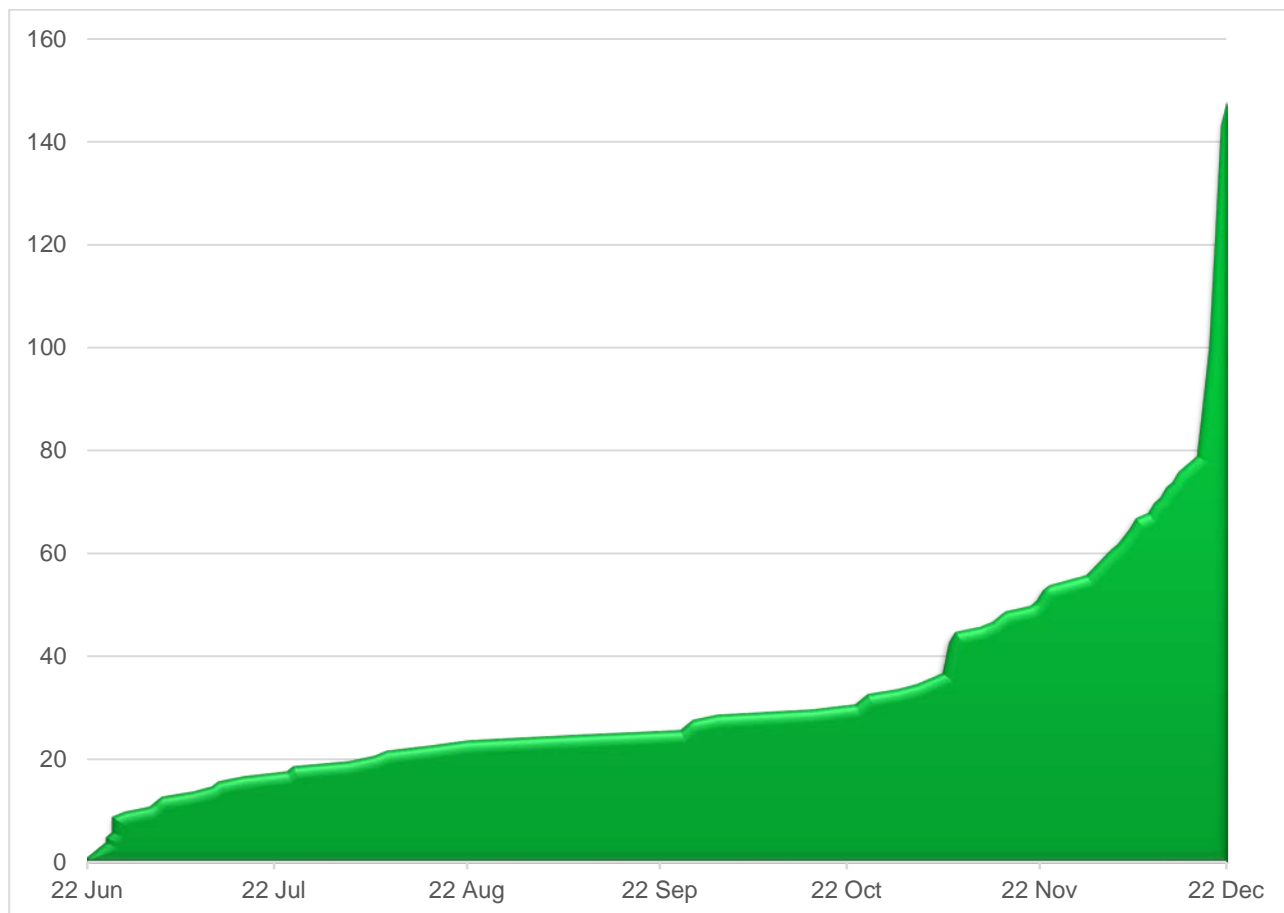
Figure 3: Response by organisation type



2.1.5. When did we receive the responses?

We received the majority of the responses during the last two weeks of the consultation period, with a peak in the last few days. The cumulative number of responses received is summarised in Figure 4. We actively manage the consultation throughout the 6 month period so, although all responses are given equal consideration, early responses are preferred.

Figure 4: When responses were received



3. Summary of key findings and actions for England

3.1. How river basin management plans are linked to other plans and strategies

River basin management plans promote an integrated approach to managing the water environment, including the supply of drinking water and the protection of sensitive habitats, such as bathing and shellfish waters.

In the consultation we set out how the plans can best protect and improve the water environment and the benefits that water provides to people and society. We highlighted how the plans draw together the aims, objectives and actions from many other water related plans and strategies. We outlined the following plans and strategies in the [working together consultation](#) document.

3.1.1. 25 year environment plan

The government's [25 year environment plan](#) (25 YEP) sets out the UK wide, long term ambition to improve the environment. The Secretary of State has stated that the 25 YEP is a direct translation of the commitments of the Water Framework Directive⁴. As such, river basin management plans remain the key mechanism for ensuring that we achieve the 25 YEP goal of clean and plentiful water.

3.1.2. Climate change

Climate change planning is an integral part of the river basin management plans and we will embed the latest [2018 UK climate change projections](#) into the programme. We have a programme of work to ensure that climate change projections of temperature, precipitation and sea level rise are being incorporated into the river basin planning process and we are working with partners to determine the challenges and choices that we will face for our waters in the future.

3.1.3. Flooding

[Flood risk management plans](#) highlight the risk of flooding from rivers, the sea, surface run-off, groundwater and reservoirs. They explain how [flood and coastal erosion risk management authorities](#) will work with communities to manage flood risk over the next 6 years. We will publish the updated flood risk management plans in 2021. Aligning flood risk and river basin management plans provides a joined up approach to catchment planning and an opportunity to investigate how working with natural processes can better protect ourselves from flooding.

The [national flood and coastal erosion risk management strategy](#) underpins flood and coastal risk management in England. We are working with partners and participants to review the strategy. This is a collaborative process, designed to achieve a shared

⁴ <http://researchbriefings.files.parliament.uk/documents/CBP-7246/CBP-7246.pdf>

approach for managing flood risk and contributes to achieving the government's wider 25 year environment plan objectives. We are publishing the revised strategy in 2019.

3.1.4. Water resources

Water companies in England and Wales must produce [water resource management plans](#) every 5 years to show how they will provide a secure supply of water to their customers while protecting the environment over a 25 year period. They are publishing the next set of plans in 2019. These will include options to manage demand by improving water efficiency and reducing leakage, as well as options to increase supply through the development of new resources.

The plans will also include actions to reduce the impact of damaging abstractions on the water environment. These actions will play an important role in helping us achieve the environmental objectives set out in the river basin management plans. The river basin management plans will also link to the [water abstraction plan 2017](#) which sets out how the government are reforming water abstraction management and how this will further protect the environment and improve access to water.

3.1.5. Water company business plans

[Water company business plans](#) describe how water companies will deliver water and wastewater services to their customers and improve and protect the environment. Water companies submitted their business plans for 2020-2025 to Ofwat (Water Services Regulation Authority) in 2018. Ofwat will announce their final determination of the plans, and the impact on water company customers' bills in 2019. Working in partnership with Natural England, we set out the expectations of water company business plans in the 2017 Water Industry Strategic Environmental Requirements (WISER) document.

The Water Industry National Environment Programme (WINEP) details the environmental measures that companies need to include in their business plans, and represents the largest investment in the water environment made by any one sector.

3.1.6. Farming

The new [farming rules for water](#), together with the new environmental land management system for agriculture, will be critical in shaping the contribution that farmers make to protect the water environment for decades to come. The river basin management plans will include these new farming rules, and any decision on future agri-environment schemes after European Union exit. This will form a key part of any actions to improve the water environment.

3.1.7. Other plans and strategies

Many other plans and strategies influence the river basin management plans. Some are national scale documents, such as the [invasive non-native species strategy](#) and [chemical reduction strategy](#), while others are local and site specific.

[Catchment plans](#), developed by catchment partnerships under the Catchment Based Approach (CaBA), help bring about integrated catchment working. This approach can provide multiple benefits for the local community, including reducing the risk of flooding and pollution, protecting drinking water resources, improving biodiversity and improving the health and recreation for local communities.

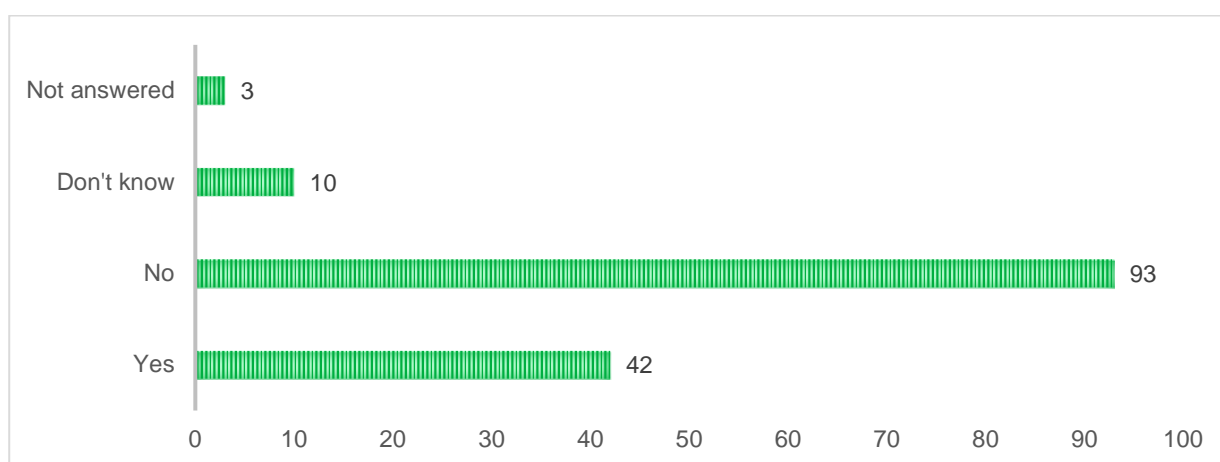
[Site improvement plans](#) outline measures needed to achieve and maintain the important species and habitats within Natura 2000 protected area sites. They provide a high level overview of the issues and priority actions to address issues affecting the condition of the site.

3.1.8. Consultation question 1

We asked your views on which plans and strategies you think we should take into account when updating plans in 2021, and whether we had identified the right ones.

93 of 148 responders (63%) said we had not, and suggested additional plans and strategies that should be considered. 28% of responders said we had (Figure 5).

Figure 5: Q1 Have we identified the right plans and strategies that affect, or are affected by, the river basin management plans?



Many plans and strategies were suggested for greater consideration, such as those relating to mine water, climate change, agricultural initiatives and protected areas. In particular, responses highlighted the need to:

- work with local and combined authorities (and other groups such as local enterprise partnerships) undertaking strategic planning to ensure local development plans maintain or improve the water environment
- ensure that we reference national marine policy and consider transitional and coastal waters more
- embed the new drainage and wastewater management plans (DWMP)

The table below summarises the key points raised by the question 1 consultation responses and the action/response that we are considering as a result.

Q1. Have we identified the right plans and strategies that affect, or are affected by, river basin management plans?	
Example/summary of your response	Our action/response
<p>Local authority area action plans/development plans</p> <p>What about the local authority area action plans and development plans? These are major controllers of planning and economic activity which impact heavily on the opportunities to both destroy and revitalise rivers and catchments.</p> <p>Are local authority and regional development plans accounted for in terms of future water resources and load on water treatment and sewage network?</p> <p>It is not clear from your outline of plans and strategies how river basin management plans interface with town and country planning processes e.g. through local authority development plans. Local planning authorities surely have a duty to 'have regard to' (or maybe even support or facilitate) river basin planning?</p>	<p>We recognise that local authorities and combined authorities are a key partner that needs to be engaged with. This includes working with them to embed maintaining/improving the water environment in local development plans.</p> <p>This is supported by:</p> <p style="padding-left: 40px;"><i>Regulation 17 of the Water Environment (WFD)(England and Wales)</i></p> <p style="padding-left: 40px;"><i>Regulations 2003 places a duty on local authorities (and other public bodies) to have regard to river basin management plans when exercising their functions; and</i></p> <p style="padding-left: 40px;"><i>Paragraph 170 (e) of the National Planning Policy Framework expects development, wherever possible, to help 'improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.'</i></p> <p>Planning for water management at a catchment scale is an ideal topic for consideration under the statutory duty to co-operate on strategic matters as required by S33A of the Planning and Compulsory Purchase Act 2004 (as inserted by S110 Localism Act 2011). The duty to co-operate applies to the preparation of local plans and applies to local authorities and other public bodies specified in regulations.</p> <p>We are working with local staff to highlight the value that engagement with local and combined authorities will bring to river basin planning. We are also working through the Catchment Based Approach National Support Group (urban sub-group) to provide good practice guidance for engaging local and</p>

	combined authority planners, developers and local enterprise partnerships.
<p>Protected areas - biodiversity</p> <p>It is vital where Natura 2000 (N2K) or sites of special scientific interest (SSSI) rivers are present within a river basin. These plans are a lot more specific than the site improvement plan and provide much more detail on exactly what needs to be done. This includes diffuse water pollution plans and river restoration strategies.</p> <p>Biodiversity strategy and targets - if any strategy following on from Biodiversity 2020 is developed, this must either be clearly reflected within Defra group area integrated plans or otherwise directly within river basin management plans. While the river basin management plans will take account of water dependent Natura 2000 (N2K) sites, they should also consider the requirements of SSSIs outside of the N2K network, and the requirements of species and habitats listed under the Natural Environment and Rural Communities (NERC) Act.</p>	<p>Article 4 and 6 of the Water Framework Directive cover protected areas.</p> <p>We are working closely with Natural England to update 36 diffuse water pollution plans across England and to achieve Water Framework Directive objectives of these Natura 2000 sites.</p>
<p>Marine strategy framework directive Marine protected areas</p> <p>The national marine policy and its application at country and regional level does not appear to have been considered in this consultation.</p> <p>Coastal catchments are not referenced here, at all, leaving a significant gap in the requirements of the WFD.</p> <p>At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.</p>	<p>Defra's marine strategy recognises the Water Framework Directive (WFD) as a key delivery mechanism for the Marine Strategy Framework Directive (MSFD).</p> <p>We take a source to sea, catchment to coast, approach with regards to estuary and coastal waters. Since the last river basin management plan, we have invested in extra monitoring to assess nutrient pressures specifically in these waters and now have a good evidence base to facilitate targeted action in these catchments. We have contributed this monitoring data to the forthcoming marine strategy assessments.</p> <p>In relation to Marine Protected Areas (MPA), we are working closely with Natural England to assess the status of waterbodies alongside the condition of the MPA. For the last 8 years we have been collaboratively running monitoring surveys to provide the evidence</p>

<p>The English Inshore Fisheries and Conservation Authorities (IFCAs) have a role and remit connected with sustainable utilisation and conservation of inshore areas. Whilst there may be limited geographic overlap of river basin management plans and IFCA areas, there is a functional interaction due to the interconnectedness of aquatic environments.</p>	<p>base to inform the management of both WFD waterbodies and MPAs.</p> <p>Focused discussions on estuarine and coastal waters at the Water Leaders Group and with coastal partnerships have helped to raise the profile of estuaries and coastal waters. We will also continue to pursue plans and actions in the upstream catchments of our estuaries and adjacent coastal waters taking into account a systems approach to managing the environmental issues that impact upon our marine environment. This recognises the interconnectedness of surface waters and groundwaters from source to sea.</p> <p>We welcome the support of the English Inshore Fisheries and Conservation Authorities (including membership of the Water Leaders Group) to support the development and delivery of river basin planning in estuarine and coastal waters. We continue to forge links with IFCAs at a local level with the monitoring and assessment of our nearshore marine environment, and through our fisheries enforcement responsibilities protecting inshore fish resources.</p>
<p>Marine litter/plastics</p> <p>The update of the river basin management plan provides an opportunity to reconsider how Water Framework Directive targets and challenges are delivered. The level of investment needed to meet all the requirements already identified, as well as emerging issues surrounding new contaminants (such as micro-plastics and pharmaceuticals) not only challenges the ability of existing systems to be able to cope with the huge scale of the undertaking, but also reinforces the need to work collaboratively with a wide range of stakeholders in order to affect sustainable change.</p> <p>The Marine Strategy Regulations 2010 do not include transitional waters (estuaries, rias and rivers) and the Water Environment (Water Framework Directive) (England and</p>	<p>Plastics pollution or marine litter are not specifically considered under the current river basin management plans. However, we are considering how best to highlight the risk of plastics, and the emerging risk of micro-plastics, pollution from land to the river and marine environment within the challenges and choices consultation.</p> <p>We have a cross-business coordinating group to develop a more coherent understanding of the issue and regulatory framework. We are working with the various sectors, (including the energy sector, bio-waste, agriculture, Highways England, the water industry and leading academics) to investigate the sources, types and pathways that micro-plastics enter the environment which will help us to plan to tackle this type of pollution at the source.</p> <p>As an organisation, we are reducing our use of single use plastics across our supply</p>

<p>Wales) 2017 does not address the issue of marine litter.</p>	<p>chains and estates, improving looking to improve practice across the Defra group.</p>
<p>Agriculture Bill/environmental land management</p> <p>The Environment Agency should consider how the legislation that arises from the Agricultural Bill could affect the river basin management plans.</p>	<p>Legislation that arises from the Agriculture Bill and environmental land management will be critical to shaping the future river basin management plans.</p> <p>We are working with colleagues across the Defra group to understand how future agricultural policy will link with and support future river basin planning.</p> <p>We are also working with the Catchment Based Approach National Support Group (agricultural sub-group) to provide guidance on good practice when engaging the agriculture, forestry and wider land management supply chain in catchment partnership working. This includes considering the advice and incentives in a catchment to support rural industries implement more water friendly practices.</p>
<p>Drainage and wastewater management plans (DWMPs)</p> <p>There is no mention of the newly created framework for producing DWMPs. This framework was launched in September 2018.</p> <p>A key omission is the mention of drainage and wastewater management plans which water companies will lead the development of and will involve significant consultation with similar stakeholder groups to the river basin management plans. DWMPs will be the water industry's way of demonstrating a transparent and consistent approach to developing options to address risks to service and the environment giving rise to well evidenced investment plans.</p>	<p>Working with other stakeholders, we have contributed to the development of the drainage and wastewater management plan (DWMP) framework. The framework outlines how water and sewerage companies will maintain, improve, and increase capacity of their drainage network and wastewater services over at least 25 years. For the first time these plans will put the planning of drainage and wastewater services on a level footing with the planning for water quantity.</p> <p>Water companies will produce their final DWMPs in Autumn 2023 which will support their 2024 price review business plans for Ofwat (the economic regulator of the water sector in England and Wales). We expect that there will be a strong link between the development of the DWMPs and the river basin planning process. Water and Sewerage companies should undertake consultation on the development of their DWMPs.</p> <p>Where measures identified through the DWMP process are believed to prevent deterioration against, or improve, compliance with environmental objectives we expect</p>

	<p>these to be incorporated within the actions of the river basin management plan.</p> <p>Likewise, the DWMP must show strong links with plans generated by other risk management authorities, including river basin management plans. We therefore expect relevant measures from river basin management plans to be embedded within DWMPs.</p> <p>We will also work with water and sewerage companies to review the misalignment of river basin management plans and DWMP timescales and advise how this should be taken forward.</p> <p>In January 2019 Defra launched a consultation on improving our management of water in the environment with proposals to modernise water regulation and allow better long term planning of water resources and drainage. The consultation ran for 8 weeks: https://www.gov.uk/government/consultations/improving-our-management-of-water-in-the-environment</p> <p>One of the proposals is to make DWMPs statutory for water companies which would put them on the same legal footing as water resources management plans.</p>
<p>Mine waters</p> <p>There is no mention of mine water management programmes, or strategies, and how these may be impacted by the river basin plans.</p> <p>Changes to the river basin management plans may significantly impact areas where mine water rebound is occurring and preventative treatment schemes may be required/will be required to control water levels/mine water pollution. In particular there are coal mining areas where saline water will emerge from flooded mines, and it will be necessary to tolerate and adapt to a certain amount of impact.</p>	<p>We recognise that pollution of rivers and groundwater from abandoned coal and metal mines is a significant water management issue, and so will feature in the challenges and choices consultation.</p> <p>Actions to deal with these sources of pollution are currently funded by the Department for Business, Energy and Industrial Strategy (through the Coal Authority for abandoned deep coal mines) and Defra.</p> <p>We acknowledge that central government funding is required to continue to operate existing mine water treatment schemes to prevent deterioration in waterbody status, as well as to construct further remedial schemes, and that this funding depends on future government spending reviews.</p> <p>Abandoned mines are causing waterbodies to fail to achieve good status in the following river basin districts: Anglian, Humber, North</p>

	West, Northumbria, Severn, Solway Tweed, and South West.
<p>Climate change</p> <p>It will be important to ensure the objectives of the climate change committee and adaptation sub-committee are incorporated so that sufficient notice is taken of the need to develop resilience and adaptation.</p>	<p>We work closely with the adaptation sub-committee on the UK climate change risk assessments and on the development and monitoring of the national adaptation programme. We also work closely with Department for Business, Energy and Industrial Strategy on the regulatory schemes that manage emissions that contribute to climate change.</p> <p>We are committed, from the highest level⁵, that the review and update of the river basin management plans in 2021 will be the most connected to climate change resilience needs and measures. We have a programme of work to ensure that climate change projections of temperature, precipitation and sea level rise are incorporated into river basin planning and we are working with partners to determine the challenges and choices that we will face for our waters in the near and distant future.</p>
<p>Drinking water safeguard zones</p> <p>The consultation paper does not mention drinking water safeguard zones. These zones designate areas in which the use of certain substances must be carefully managed to prevent the pollution of water that is abstracted for drinking water. The information assists farmers to plan their operations in a way which protects water.</p>	<p>We identify safeguard zones (SgZ) to protect drinking water that are 'at risk' of not meeting the Water Framework Directive drinking water objectives. We work with all relevant partners, including water companies, to agree actions in these non-statutory areas. These actions encourage voluntary land use and management practices to improve rivers, lakes and groundwater. The river basin management plans are one of the main tools for delivering the drinking water protected area objectives.</p>
<p>Agriculture initiatives</p> <p>Agricultural industry led initiatives such as the Voluntary Initiative, 'Tried and Tested', Campaign for the Farmed Environment and the greenhouse gas action plan also play a critical role in influencing farmer behaviour and increasing best</p>	<p>These industry led initiatives are recognised as important mechanisms to deliver the river basin planning. We anticipate that the industry will take the lead in promoting these and look to invigorate these initiatives in the future.</p>

⁵ <https://www.gov.uk/government/news/speech-climate-change-too-true-to-be-good>

<p>practice on farm in order to protect water.</p>	
<p>Catchment partnerships ...the plans developed through the Catchment Based Approach are not fully resourced. Does attention need to be paid to critical areas of the river basin management plans and the how these actions will be funded?</p>	<p>We acknowledge that the activities of catchment partnerships, including lake, groundwater, estuarine and coastal partners, are fundamental to catchment management. We are working closely with the Catchment Based Approach National Support Group to consider how this work is most appropriately resourced and to understand how catchment partnerships can inform the update of the river basin management plans.</p>
<p>Natural capital River basin management plans will need to make the business case that this investment will be delivering multiple benefits that will deliver on a number of other agendas, such as health and wellbeing, creating the right environment for business to invest and stimulate economic growth, climate change adaptation...</p>	<p>Natural capital approaches offer us alternative ways to achieve the objectives for improving England's waters. The 2021 river basin management plans will introduce natural capital thinking and encourage a whole systems approach to understanding problems and exploring solutions.</p> <p>Fully embedding the natural capital approach will not happen by 2021. However, we are working with partners to develop natural capital tools and evidence over the next few years to help realise our aim of achieving river basin planning objectives, more benefits for people and wildlife, improving people's wellbeing, and supporting a sustainable and resilient economy.</p>
<p>Water company business plans There is a significant gap between the timings set out for the river basin management plan update process and water company business planning cycles, which will only grow in future years. This gap creates uncertainty over investment decisions that has the potential to cause delays in implementation of schemes and therefore delivery of environmental benefits, and also potentially causes inefficient delivery and supply chain constraints</p> <p>The next version of the water industry national environment programme is</p>	<p>We recognise the misalignment with the business planning timescales. This is because the river basin planning timescales are driven by European legislation and water company business planning is an Ofwat process.</p> <p>To address this we have introduced a 'managing uncertainty' approach for the development of the water industry national environment programme (WINEP). All certain measures and indicative measures (pending ministerial decision on affordability) should have been costed within water company business plans. Ofwat have supported the use of a cost adjustment mechanism to</p>

<p>scheduled to be issued by the Environment Agency at the end of March 2019, but it won't be finalised until the whole river basin management plans is agreed and issued in December 2021. Essentially water companies work to a 5 year investment programme whereas the river basin management plans have a 6 year duration.</p> <p>We appreciate that the river basin management plans timetable is set by legislation but believe that there are opportunities to provide more certainty earlier to facilitate investment planning by water companies. Otherwise it appears as through the largest contributor of measures, the water industry, is being held back in commencing delivery due to the long and protracted river basin management plans consultation process.</p>	<p>ensure there is no cost to customers if measures do not go ahead.</p> <p>We are currently working with Defra to provide more certainty on water company schemes included in WINEP during the current water company business planning period price review 2019 (PR19) to meet waterbody objectives. If successful this will allow water companies to deliver measures before river basin management plans are signed off in December 2021.</p> <p>In addition to the 'managing uncertainty' approach, Ofwat has included a transition programme which provides companies with the opportunity to use PR19 expenditure allowances in 2019-20, where appropriate. This will enable companies to bring forward investment in investigations and other measures that will ensure statutory deadlines are met early in the next regulatory period.</p> <p>During PR19 water companies have been able to apply for time extensions related to WFD improvement/enhancement measures to support the delivery of long term sustainable outcomes and to maximise environmental benefit.</p>
<p>Monitoring</p> <p>There is no reference to strategic sampling/monitoring reviews being undertaken by the Environment Agency - there are likely to be some serious gaps in data and information on which to base decisions about pressures and measures/interventions required.</p>	<p>The new monitoring programme will allow local decision making as to where evidence/monitoring is required to drive improvements. Although there will be less frequent monitoring, most waterbodies will have some new water quality sampling to use. Applying local knowledge and evidence, and working more closely with our catchment partners, will allow us to concentrate our efforts on the sites with the most need.</p>
<p>Nature recovery network</p> <p>The key aspect missing from the consultation paper is that of a nature recovery network (NRN). The wildlife trusts propose that, under a new environment act, local nature recovery maps would be produced to achieve key government targets for increasing the extent and quality of natural habitats. Local authorities would have a requirement to do this, working with neighbouring</p>	<p>Biodiversity focussed work forms an integral part of the solution to addressing the pressures on the environment, improving to good ecological status and preventing deterioration. We will continue to work with partners to embed the biodiversity ambition within the 25 year environment plan, including a nature recovery network, priority habitats and species recovery within the river basin management plans. In estuaries and coastal waters we are developing an approach to</p>

<p>authorities at their boundaries to develop a coherent and effective framework. Rivers are key threads running through our landscapes and will form a core feature in any effective NRN.</p>	<p>address restoration of key habitats across government and in partnership with businesses, non-governmental organisations and academia.</p> <p>We welcome further discussion with the wildlife trusts on how our work to date in this area can contribute to local nature recovery maps.</p>
<p>Flood risk management plans</p> <p>Better integration with flood risk management plans (FRMP) is something that stakeholders have consistently called for. Whilst aligning engagement over these two plans is welcomed, more meaningful alignment of the plans themselves will be necessary to secure the delivery of flood risk management schemes that work with natural processes. The national flood and coastal erosion risk management strategy (currently under review) will inform the development of FRMPs and it is an aspiration of stakeholders including the wildlife trusts that the strategy will include strong recommendations on the provision of incentives for the delivery of natural flood management, and a requirement that all flood risk proposals must consider the scope to deliver natural flood management schemes</p>	<p>We are committed to ensuring consistency and alignment between different strategic planning processes, including between river basin planning and flood risk management plans (FRMP). We are continuing to work towards joining up the engagement and consultation as the respective plans are updated. For example, the working together consultation embedded links to the FRMP updates to help people comment on the overall planning processes in an informed way. We are also developing a data tool for FRMPs that provides access to flood risk information in a format and style consistent with our provision of river basin planning data and information. This will allow the analysis of flood and environmental information for the same place in one visit.</p> <p>In addition to our ambition on engagement, we are also exploring ways to create better join up of objectives and measures across the two planning processes.</p> <p>We are still developing the national flood and coastal risk management strategy. There are extensive opportunities for working with natural processes to help reduce flood and coastal erosion risk while, at the same time, contributing to other ambitions within the 25 year environment plan. We are committed to ensuring that society has the full range of tools, information and measures to help reduce flood and coastal erosion risk now, and in future climate change scenarios. These measures include working with landowners and farmers to make use of natural flood management wherever it can make an effective contribution to reducing flooding.</p>

3.1.9. Other plans and strategies to consider

You suggest a number of other plans and strategies to consider. We acknowledge that alignment with other plans and strategies is essential as we develop the 2021 river basin management plans and we will consider whether those listed below are appropriate.

- Area integrated plans
- Areas of outstanding natural beauty
- Biodiversity action plans
- Canal & River Trust's water resource strategy
- Clean growth strategies
- Commercial development propositions
- Community flood action groups
- Drought plans
- English Lake District world heritage site green infrastructures strategy
- Hydropower plans
- Integrated water management plans
- Habitat regulation assessments
- Internal drainage board action plans
- Local access forum plans
- The Mayor of London's London environment strategy
- Minerals and waste plans
- National park management plans
- National planning policy framework
- Northern forest plans
- Nutrient management plans
- Regional invasive non-native species plans
- Salmon action plans
- Shoreline management plans
- Strategic housing land availability assessments
- Tree health resilience strategy
- Water level management plans

3.2. Our proposed programme of work and timetable

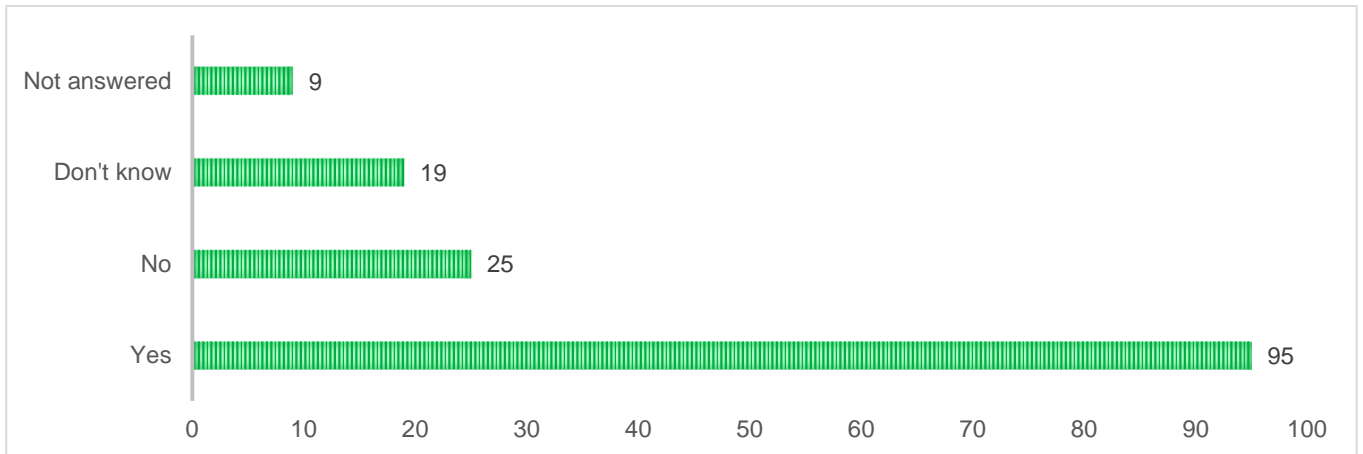
3.2.1. Consultation question 2

We asked whether the proposed programme included all the significant steps necessary to review and update the river basin management plans.

95 of 148 responders (64%) said we had; 25 (17%) said we had not (Figure 6).

Most of the responses said that we had, but also referred to learning lessons from previous updates, cross-border working, and the need for economic appraisals.

Figure 6: Does the programme set out include all of the significant steps necessary to review and update the river basin management plans?



The table below summarises the key points raised by question 2 of the consultation and the action/response that we are considering as a result.

Q2: Does the programme set out include all of the significant steps necessary to review and update the river basin management plans?	
Example/summary of your response	Our action/response
<p>Learning lessons from before</p> <p>More emphasis needs to be put on reviewing success (or otherwise) of previous iterations of the river basin management plans to understand which activities deliver greatest benefits. Similarly, learning from across Europe regarding delivery of river basin management plans would be helpful</p>	<p>We led on a project to review the second cycle of the river basin management planning process. It made a number of recommendations including the importance of avoiding intensive periods of activity (use ongoing process of planning and delivery not one-off planning activities), and the importance of aligning with other programmes of work such as flood risk management plans.</p> <p>We are incorporating the learning from this project in the development of the 2021 river basin management plans.</p> <p>We regularly liaise with colleagues across Europe to ensure that lessons learnt across the continent are shared. Case study examples can be found on the Restoring Europe's Rivers webpage.</p>

<p>Economic appraisal</p> <p>One element of economic appraisal of options is to consider if measures are disproportionately costly. The UK's current approach to considering this could be improved to result in better outcomes for society, and two elements in particular could benefit from enhancement. These are a) better consideration of 'affordability' and b) avoiding the reduction of societal value.</p> <p>For the current plans, affordability was considered on the basis of what is already in existing plans, rather than truly testing whether any given sector (or society as a whole) could afford to deliver more obligations.</p> <p>To avoid reducing societal value, bundles of measures under consideration for the next update should be considered on their own merits, rather than rolling forward accrued benefits from measures agreed in previous plans to the calculation.</p>	<p>The economic appraisal of the river basin management plans determines whether status objectives (not measures), are disproportionately costly. We do this to make sure there is a long term net benefit to society from investing in work to achieve status objectives.</p> <p>Affordability is a political decision taken by government to make sure that meeting the objectives set out in the plans does not create a disproportionate burden on any one sector in the short term. Affordability does not change the level of ambition for the status of our waters, rather it makes sure that the rate of achievement is sustainable for those sectors responsible for delivering it.</p> <p>We are reviewing and updating the national economic assessment of the plans and this will inform government as to the benefits of different spending levels over the 2021-2027 period. Government will decide on the level of investment for each sector considering a range of other social and economic issues, such as the impact of exit from the European Union.</p> <p>Our economic appraisals for the 2015 plans looked at costs and benefits over a 40 year period to help set long-term objectives for waterbodies. The review and update of the 2021 river basin management plans is a continuation of that process. We include the benefits of measures put in place in the 2015-2021 period as they contribute to meeting objectives set over the 40 year appraisal timeline.</p> <p>Environmental benefits may take time to be realised because of the way the environment recovers once measures are put in place. For example, investment in 2019 may only yield benefits from 2021 onwards. If we have invested to gain from those benefits for society we should not disregard them</p>
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	when we review and update the river basin management plans.
<p>Strategic environmental assessment (SEA)</p> <p>The programme does not appear to be fully integrated with the SEA process. More clarity is required to show how the SEA process will be followed</p> <p>A strategic environmental assessment should be carried out. This would also have the benefit of providing a helpful common foundation for SEA's connected to land use plans that are subsequently produced by other organisations/authorities and interests.</p>	<p>We are considering the need to undertake a strategic environmental assessment (SEA) for the update of the river basin management plans in accordance with the SEA regulations 2004. We will be seeking the views on the need for this in the challenges and choices consultation before making a decision and publishing it on the GOV.UK website.</p>
<p>Resourcing</p> <p>At all stages, consideration should be given to how any actions or aspirations would be delivered, including how they would be resourced. Without this, there is a danger that commitments to actions could be made when there is no realistic chance of them being delivered, to the detriment of subsequent actions or aspirations which depend on these pre-cursors.</p>	<p>We agree that an understanding of when actions might be delivered is taken into account when setting waterbody objectives.</p>
<p>Transitional and coastal waters</p> <p>Our experience of previous river basin management plans is that limited effort is directed towards addressing issues in transitional and coastal waters and the transitional and coastal elements of the plans are therefore relatively weak.</p> <p>We recommend that Environment Agency carefully considers how best to organise work to develop meaningful plans for transitional</p>	<p>Since the publication of the 2016 river basin management plans, we have worked closely with partners to improve the focus on estuarine and coastal waters through river basin planning. This has included (but is not limited to) a specific estuarine and coastal waters engagement summary, the creation of an estuarine and coastal subgroup of the national liaison panel (and later the merging of members into the Water Leaders Group), specific estuarine and coastal workshop sessions and a focus on increasing coastal representation on catchment partnerships (with support</p>

<p>and coastal waters in this round of river basin management plans.</p>	<p>from the coastal partnership network). We are also looking to work with others to see if we can collectively achieve more restoration of habitats which will move us more towards achieving good status or ecological potential.</p> <p>We acknowledge that there is still significant work to be done in estuarine and coastal waters and remain committed to increase the focus and subsequent classifications through this planning cycle.</p>
<p>Cross-border</p> <p>We are also concerned that there may be a mismatch of classification appearing in South East Wales and parts of the Dee river basin when the Environment Agency processes the data used by Natural Resources Wales in your triennial classification to be published in 2019.</p>	<p>We are working closely with Natural Resources Wales (and the Scottish Environmental Protection Agency) to ensure that the appropriate data and evidence is shared between the respective organisations leading on cross-border planning.</p>
<p>European Union exit</p> <p>...would like to question how the river basin planning timeframes will adapt and align with the outcomes of EU Exit? Consideration and contingency needs to be built into this process to enable the river basin management plans to be responsive and influential as the politics of the country are under a significant period of change.</p> <p>..the Environment Agency and Defra may wish to take the opportunity offered by the forthcoming Brexit process and legislative changes to recast the river basin planning process set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 by adjusting the relevant timescales.</p>	<p>At the time of writing, the UK will be leaving the European Union on 29 March 2019. The EU Withdrawal Act will carry over existing EU law, including the requirements of the Water Framework Directive, into domestic law. The process will only make technical changes to the legislation relating to river basin management planning so remains operable after EU Exit.</p> <p>The obligation to review and update the river basin management plans is set out in our domestic law, the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, and these obligations will continue to apply. We will therefore complete the review and update to the plans in 2021 under the current set of WFD regulations, as amended in domestic law by the process of leaving the EU.</p> <p>The European Commission is carrying out a fitness check on the Water</p>

	<p>Framework Directive. It anticipates its assessment report will be completed by the middle of 2019. The fitness check will be assessing the effectiveness and efficiency of the directive amongst other things. The Commission has indicated this is a fitness check of the directive and that it will not automatically lead to a revision.</p>
<p>Catchment partnerships</p> <p>This consultation process is unlikely to capture the views of all the stakeholders in river catchments. The process by which consultation is done needs a complete overhaul, in order to properly engage those affected by or able to influence river management. At present Catchment Based Approach meetings are dominated by individuals paid to be involved and is failing to engage those who are not.</p> <p>In our experience catchment partnerships have a very narrow representation primarily drawn from environmental non-governmental organisations and operating at a local level with very few links into associated industries or to other interested parties.</p>	<p>River basin management plans are strategic plans that can shape policy, mechanisms and funding for actions that protect and improve the environment. By engaging in river basin planning, partners can directly influence these outcomes. The plans also contain the statutory objectives for the water environment, and our partners should use these objectives to help target their own activity and actions.</p> <p>We recognise that the some sectors are often under represented on catchment partnership groups. This has been raised at the Water Leaders Group and we are working with partners and the Catchment Based National Support Group to improve performance and encourage inclusivity and representation on all catchment partnerships.</p>
<p>River basin liaison panels</p> <p>The end of river basin liaison panels has meant that there is no overarching strategic forum for organisations such as ourselves to engage on river basin wide issues. We believe that this means that there is a missed level within the process to bring in wider views and opportunities from across the river basin which would enable a more joined up approach. The National Farmers Union (NFU) proposes that river basin liaison panels should be reformed and brought together from the start of the challenges and choices consultation.</p>	<p>We originally established river basin district liaison panels to discuss and influence the development of river basin management plans and assist with their implementation. Given the emphasis on catchments and local delivery, we decided that the focus for delivery should be through the Environment Agency's 14 operational areas, rather than at a river basin district scale, and in 2016 withdrew support for running the liaison panels. The focus now is on delivering this work at an area and catchment scale through existing engagement mechanisms.</p>

<p>Price review</p> <p>We believe that there is an opportunity (particularly for price review 24) to agree the water industry national environment programme at an earlier stage, prior to the final river basin management plans, to ensure that the water industry can meet the timescales inherent in the business planning process. Failure to incorporate these requirements in the next river basin management plans revision will cause significant issues, confusion and duplication of effort to both the water industry, the Environment Agency and those in the wider water delivery sector.</p>	<p>The water industry national environment programme (WINEP) sets out the actions that both we and Natural England expect water companies to deliver for the period 2020-2025. The water company WINEP actions will help tackle some of the biggest challenges facing the water environment including the spread of invasive species, low flows and the effects of chemical and nutrient pollution.</p> <p>We acknowledge the WINEP process could be improved and we will invite water companies to play a full role in the design of our processes to inform the next price review and the WINEP.</p> <p>However, we are unable to deliver the price review 24 WINEP before the completion of the update to the river basin management plans in 2021. To do so would pre-empt the outcome of the investigations within the WINEP that complete in September 2021.</p>
<p>Natura 2000 sites</p> <p>We believe the programme will need to include specific inclusion of steps necessary to meet the issues identified by the ongoing judicial review activities for key protected sites within the plan area, given their potential to change outcomes and targets. A clear process for engaging with this area of work or inclusion of outputs is required to avoid confusion and ensure a fully joined up approach to delivery of actions under both Water Framework Directive and Habitats Directive requirements.</p>	<p>WWF-UK, Angling Trust and Fish Legal were granted permission for a judicial review against the Secretary of State for the Environment, Food and Rural Affairs and the Environment Agency in 2015. A consent order settling these judicial review proceedings was agreed between the parties outlining how, as part of the river basin management planning process, water protection zones (WPZ) should be considered in various Natura 2000 sites impacted by diffuse pollution.</p> <p>In partnership with Natural England, we have been carrying out further investigations, monitoring, evidence gathering, modelling and analysis at 36 Natura 2000 sites. This evidence base will be used to assess whether the identified measures are likely to be sufficient to meet the WFD protected area objectives for each of the 36 Natura 2000 sites, including whether</p>

	those measures might be best delivered by a WPZ or other mechanisms.
<p>Industrial sector</p> <p>There should include steps to consult with the industrial sector to fully understand the long term implications of introducing new chemical permits, whether directly or indirectly via trade effluent discharges to sewers. Introduction of trade effluent permits may ultimately impact on productivity, and on long term business decisions on locating future developments and production lines.</p>	<p>The Environment Agency has a statutory duty to achieve compliance with WFD environmental quality standards. Permit limits on water company waste water treatment works are one of the mechanisms to do this. Trade effluent is regulated by the water industry and as such it is the industry's responsibility to manage the relationship with traders, explain the regulatory context and seek ways to facilitate industrial activity whilst still protecting the environment through permit compliance.</p>
<p>Other consultations</p> <p>The programme does not include reference to some of the other significant consultations that may also be taking part over similar timelines and may influence at each stage including:</p> <p>There is a fitness check of the Water Framework Directive consultation ongoing – this is a European Commission public consultation (closes March 2019) - I am not sure on the expected outcome of this or how they are expecting to respond to it.</p>	<p>The European Commission is carrying out a fitness check on the Water Framework Directive. It anticipates the assessment report will be completed by the middle of 2019. One of the things the fitness check will assess is the effectiveness and efficiency of the directive. The Commission has indicated this is a fitness check of the directive and that it will not automatically lead to a revision of the WFD.</p>
<p>Evidence base</p> <p>Will the evidence base for third cycle river basin management plans actually be 'improved' - when will the stakeholders (who are potentially being asked or would like to feed into this) going to be consulted about the evidence base...? Are the third cycle plans going to adopt a natural capital approach, are they going to be created through a collaborative approach with local environmental partnerships?</p>	<p>We are reviewing and updating the 'pressure narratives' that we produced for the 2015 river basin management plans. This will be a light touch review to identify where evidence has significantly changed. The priority is to find more engaging ways of presenting our evidence (with the aim of achieving more and better environmental outcomes) rather than seeking marginal improvements in the evidence base.</p>

	<p>We are going to use hyperlinks in the challenges and choices consultation to direct readers to the pressure narratives and relevant infographics.</p> <p>Classifications, which will be consulted on in the draft plan, will contain new information for most elements based on data gathered in 2016-2018.</p> <p>Fully embedding the natural capital approach will not happen by 2021, but we are working with partners to develop natural capital tools and evidence over the next few years to help realise our aim of achieving the river basin planning objectives and more benefits for people and wildlife, whilst improving people's wellbeing and supporting a sustainable and resilient economy.</p>
<p>Identification of measures</p> <p>There are a number of key steps missing:</p> <ul style="list-style-type: none"> • The programme of measure need to address all reasons for not achieving good • The technically achievable assessment needs to be reviewed and be transparent • The disproportionate cost reporting and cost benefit assessment requires improvement and to be more transparent • There needs to be greater clarity and transparency on how affordability decision are made • The scope and potential of alternative objectives needs reviewing to stimulate innovation to improve waterbody ecology, the fundamental purpose of the Directive and the Regulations 	<p>The more detailed technical aspects of river basin planning, including the processes of identifying measures and objectives, are described in detail in part 2 of the current river basin management plans.</p>
<p>Engagement</p> <p>We note that the timescales the challenges and choices consultation overlap with that for engagement and again for the draft update to</p>	<p>Throughout the consultation period we look at your responses and consider them. They are used continually to help shape the programme. Early</p>

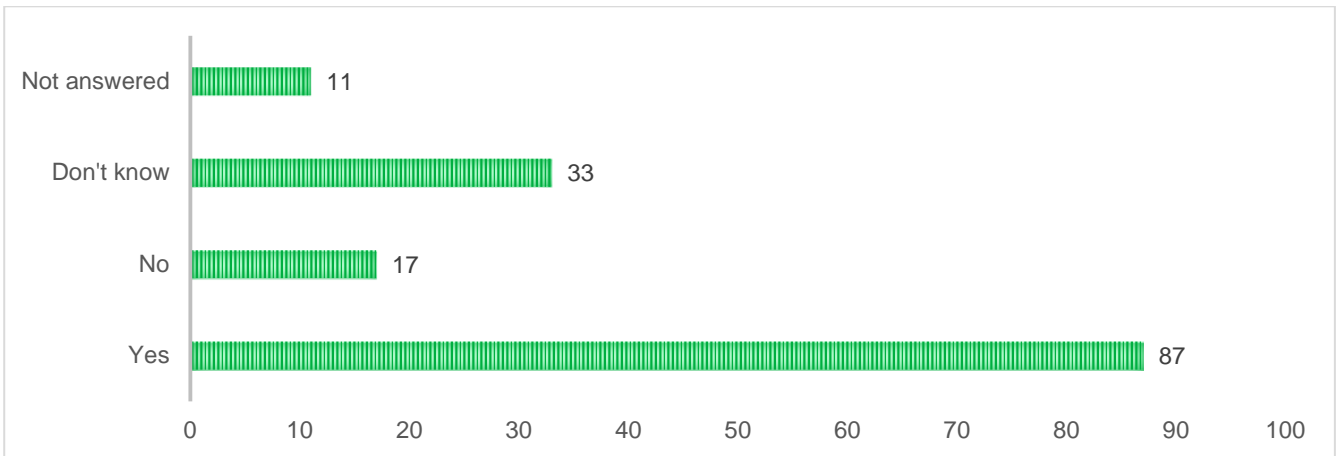
<p>river basin management plans consultation and engagement. How consultation responses made at or near the closing date inform engagement carried out early and within the overlapping period?</p>	<p>consultation responses give us more time to consider how they could contribute to the review and update of the river basin management plans. Appendix 6.1.2 has been updated with the new consultation dates and acknowledges that engagement is an ongoing process throughout.</p>
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3.2.2. Consultation Question 3

We asked whether the timetable set out was realistic and achievable.

87 of 148 responders (59%) said it was, whereas 17 (11%) said it was not (Figure 7). The highlighted risks included those associated with European Union exit and future resourcing.

Figure 7: Is the timetable set out for achieving the work programme realistic and achievable by 2021?



Following consultation, we made the decision to slow the current phase of work to update the river basin management plans.

Challenges and choices will now start 5 months later than planned in October 2019 (closing April 2020). Challenges and choices asks for views on the significant water management issues and how these should be addressed.

The draft updated plans consultation will now start 4 months later than planned in October 2020 (closing April 2021). The draft updated river basin management plans consultation asks for views on the proposed long term objectives for the water environment and the measures to achieve them.

Because we had proposed publishing each consultation earlier than the statutory deadlines we had the flexibility to move these dates. This gives more time after the consultation for us to consider all responses and, where necessary, further engage with delivery partners to ensure the updated plans are as good as possible and fully supported.

The date to publish the approved plans remains the same. The new timetable is shown in table below and in appendix 6.1.2.

Activity	Start date	End date
Working together	Jun 18	Dec 18
Challenges and choices	Oct 19	Apr 20
Draft plans	Oct 20	Apr 21
Publish approved plans	Dec 21	-

We have made this change due to priority European Union exit work and ongoing prolonged dry weather recovery work that started in 2018. These have all reduced the resource available for many activities within the Defra group, including river basin planning.

We also want to make the plans more strategic, ambitious and forward looking. This extra time will allow us to make them a better tool to help deliver the ambition in the 25 year environment plan and emerging Environment Bill.

Compared to the last cycle we have reduced the amount of analytical/technical process work we will need to do. This means we have more flexibility to move programme dates without risking the creation of significant extra pressures elsewhere in the programme.

The table below summarises the key points raised by the question 3 consultation responses and the action/response that we are considering as a result.

Q3: Is the timetable set out for achieving the work programme realistic and achievable by 2021?	
Example/summary of your response	Our action/response
The timetable appears realistic	No action
<p>European Union exit</p> <p>How will you know enough about what the post-EU Exit situation will be to set stretching objectives for the period out to 2027?</p> <p>The text of the document mentions EU Exit. We need to be mindful that the outcomes of EU Exit could impact on the staff resources needed to deliver this work programme.</p> <p>In light of EU Exit, agricultural reforms, environmental reforms etc. it is difficult to answer this question especially as we do not know the resourcing levels allocated to river basin management plans</p>	<p>At the time of writing, the UK will be leaving the European Union on 29 March 2019. The EU Withdrawal Act will carry over existing EU law, including the requirements of the WFD, into domestic law. The process will only make technical changes to the legislation relating to river basin management planning so remains operable after EU Exit.</p> <p>The obligation to review and update the river basin management plans is set out in our domestic law, principally the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, and these obligations will continue to apply. We will therefore complete the review and</p>

	<p>update to the plans in 2021 under the current set of WFD Regulations, as amended in domestic law by the process of leaving the EU.</p>
<p>Consultation process</p> <p>The current programme wastes 4 years on an overly lengthy and convoluted consultation process. The government have been clear in their 25 year environment plan commitment to ‘hand over our planet to the next generation in a better condition than when we inherited it’, so with the proposed long 4 year consultation period, we are wasting valuable delivery time.</p>	<p>The Secretary of State confirmed that the 25 year environment plan is intended as “a direct translation of the commitments of the Water Framework Directive”⁶. The 25 YEP target of "75% of waters close to their natural state" aligns with achievement of 75% of waterbodies at good status, as set out in the current river basin management plans. We will ask in the challenges and choices consultation how best we achieve this.</p>
<p>Agriculture post-European Union exit</p> <p>...the consultation clearly promotes the new environmental land management system for agriculture as a key mechanism to shape the contribution that farmers make to protect the water environment. Defra is currently developing environmental land management scheme (ELMs). We would therefore recommend that the Environment Agency work with Defra to ensure that the development of ELMs is designed to deliver for the objectives and actions required under the future river basin management plans.</p>	<p>We are working with Defra to ensure that future environmental land management schemes will deliver environmental improvements in the future. These schemes will be integral to updating the river basin management plans.</p>
<p>Delivering outcomes</p> <p>It is realistic in terms of producing a plan. It is not realistic in terms of delivering real improvements to our water environment.</p>	<p>The timeline set out in the consultation is for the review and update of the river basin management plans by 2021.</p> <p>Implementation of the current plans will continue throughout that period, including delivery of measures to achieve the objectives in the plans.</p>

⁶ <http://researchbriefings.files.parliament.uk/documents/CBP-7246/CBP-7246.pdf>

	By the end of 2018, actions taken since the current plans were published in February 2016 had enhanced almost 4700km of waters in England.
Strategic environmental assessment Depends if strategic environmental assessment (SEA) report is required.	We are considering the need to undertake a strategic environmental assessment (SEA) for the update to the plans in accordance with the SEA Regulations 2004. We will continue to review and update the programme to integrate and meet any SEA requirements.
Timetables Engagement timetables may need to be adaptable depending on the levels of feedback received and the methods of further stakeholder engagement. If, for example, some engagement is to be facilitated through catchment partnership meetings, these meetings will need to coincide with the proposed timetable, or vice versa. We question whether consultation closure dates so close to Christmas each year are helpful in encouraging meaningful engagement from stakeholders.	<p>We agree that there needs to be flexibility in our engagement planning and we will work with catchment partners to consider how best to do this.</p> <p>We have made the decision to slow the current phase of work to update the river basin management plans. Challenges and choices will now start 5 months later than planned in October 2019 (closing April 2020).</p> <p>We have updated appendix 6.1.2 with the new consultation dates and acknowledge that engagement is an ongoing process throughout.</p>
Reporting We are concerned about the time between generating the draft plan and the approved plan is published. There is a high likelihood that pressures and/or conditions may have changed between the analysis being carried out and the report being finalised. On that note, we are aware of the resource pressures within the Environment Agency leading to depleted data collection, especially for WFD measures. What will the Environment Agency do to ensure that there is sufficient data to draw statistically valid conclusions and construct appropriate, resulting actions?	<p>The draft updated river basin management plans and the final updated plans in 2021 will use the same set of 2019 classification results as the baseline assessment of the state of the environment in terms of waterbody status. There will be no additional classification results produced between the draft plans in 2020 and updated plans in 2021.</p> <p>We will, however, endeavour to take into account in the updated plans any relevant substantial new evidence that arises from the consultation on the draft plans or from continuing engagement with partners and other stakeholders.</p>

<p>Resourcing</p> <p>It is achievable - provided that the relevant organisations allocate the necessary resources to implement the suggested programme of consultation and engagement and that the relevant partners and consultees (especially in the 'third sector') have adequate resources to be able to participate and respond in a meaningful way.</p>	<p>The Environment Agency is the main competent authority with respect to river basin planning, but all interested parties need to ensure the actions within it are carried out.</p> <p>River basin planning has been developed into the catchment based approach to help ensure that an integrated approach is taken to improve the local water environment.</p>
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3.3. Who we plan to work with

River basin planning is a cyclical, continuous process. It involves planning and implementing actions to protect and improve the water environment, checking delivery of those actions and reviewing their effectiveness. Engagement is an integral part of this ongoing process. The best way to protect and improve the water environment is by everyone becoming involved.

3.3.1. River basin districts

Experience and feedback from previous cycles tell us that river basin districts are not an appropriate scale for encouraging the active involvement of all interested parties. We need to speak to the right people at the right time.

Defra, the Environment Agency and the Catchment Based Approach National Support Group have asserted a commitment to undertake more planning and action at the river catchment scale, under the [catchment based approach](#). They agreed that there should be a new focus on facilitating delivery through improved partnership working and better integration of the various catchment based programmes of work.

Our approach for this review and update of the plans is for greater emphasis on engagement at the local and national scale, with an important role for catchment partnerships.

3.3.2. Catchment partnerships

The catchment based approach promotes collaborative working in river catchments to achieve better environmental, social and economic benefits. Catchment partnerships are now working in over 100 catchments across England.

More than 2000 organisations are engaged nationwide, including non-governmental organisations, water companies, local government, government agencies, landowners, angling clubs, farmer representative bodies, academia and local businesses.

We are working with the Catchment Based Approach National Support Group and local catchment partnerships to determine how best they should be involved in the engagement process for river basin planning 2021.

You can find more information about the catchment partnerships in your river basin district and how to get involved, including information on the National Support Group here: www.catchmentbasedapproach.org.

3.3.3. National Water Leaders Group

This group is comprised of national organisations representing a range of sectors with responsibility for, or an interest in, improving England's waters. It is chaired by the Environment Agency and meets 3 times a year. The objectives of the group are to:

- influence national policies and processes, through an integrated approach, to conserve, manage and improve the water environment
- steer environmental water planning to meet the objectives in river basin management plans
- lead and drive action to conserve, manage and improve the water environment, promoting partnerships and empower others to play their part
- share knowledge, good practice and lessons learnt in water management

The organisations that are members of the Water Leaders Group are listed in appendix 6.1.3. As a consequence of the working together consultation responses, we will be conducting a full review of Water Leaders Group membership.

3.3.4. Working with others

We work with the individual organisations and those involved in catchment partnerships, on a daily basis, either directly or through joint involvement in other groups and projects.

[Regional flood and coastal committees](#) have a key role in the co-ordination of flood and coastal erosion risk management. They guide flood and coastal management activities within catchments and along the coast, advising on and approving programmes of work for their areas and supporting the development of funding for local priority projects and works. The committees also provide for local democratic input through the majority membership of representatives from lead local flood authorities. We will engage with the committees during the review and update of the river basin management plans.

Although a significant part of the Severn river basin district is in Wales it is led on by the Environment Agency. The principles of good water management are the same either side of the border, some of the legal and administrative arrangements and some of the organisations involved are different. [Natural Resources Wales](#) has provided information on the arrangements in Wales in their working together consultation, including the Dee river basin district.

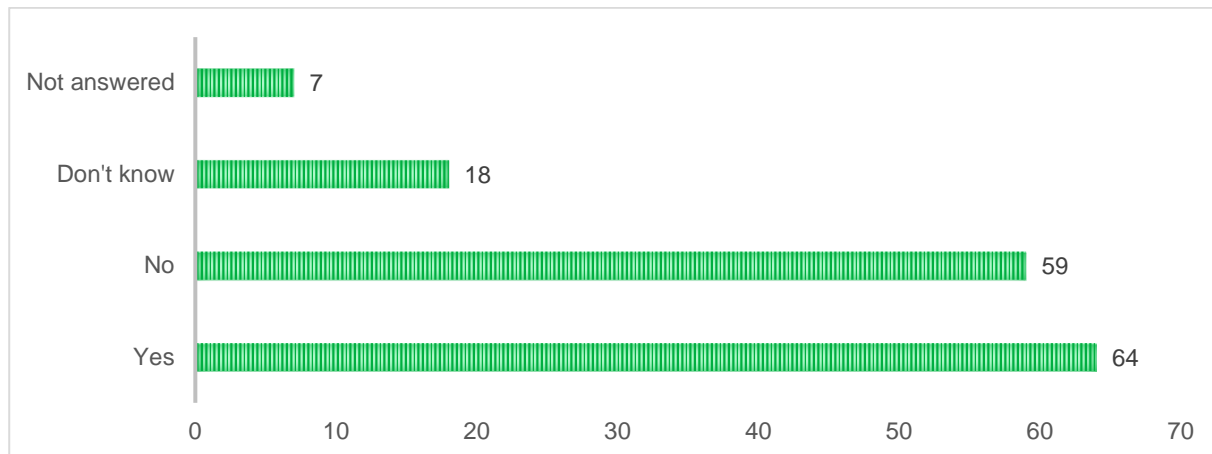
3.3.5. Consultation question 4

We asked whether we were working with the right organisations that need to be involved to review and update the plans.

65 of 148 responders (44%) said we were; 59% said we were not and identified additional organisations we need to engage with (Figure 8).

Where appropriate, we have contacted additional organisations and, if they have agreed, added them to our stakeholder lists so that they could respond to this or future consultations.

Figure 8: Are we working with the right organisations that need to be involved in reviewing and updating the river basin management plan(s)?



The table below summarises the key points raised by the question 4 consultation responses and the action/response that we are considering as a result.

Q4: Are we working with the right organisations that need to be involved in reviewing and updating the river basin management plan(s)?	
Example/summary of your response	Our action/response
<p>Water Leaders Group (WLG)</p> <p>The membership list of the Water Leaders Group seems to include the key organisations, but what is conspicuous by its absence is any direct and overt representation for the catchment partnerships. The Rivers Trust has been given a national role in respect of catchment partnerships/Catchment Based Approach (CaBA) but it is not independent because it also has to represent the local rivers trusts which comprises its membership.</p> <p>There is a lack of representation from commercial fisheries and farmed seafood producers within the WLG beyond the sectoral interest represented by the Shellfish Association of Great Britain.</p>	<p>We will be conducting a full review of Water Leaders Group membership as a consequence of the working together consultation responses.</p> <p>We are also working with the Catchment Based Approach National Support Group to share good practice on catchment partnership working (including appropriate inclusion and representation of all relevant partners). We will also continue to work at the local level to develop effective partnerships. This more inclusive approach is required to develop a more integrated, whole system approach to water management.</p>

<p>It would be prudent to broaden WLG to strengthen representation from urban and transport sectors including housing associations and representative commercial partners from the public/private highways partnerships that most local authorities now have.</p> <p>We would like to highlight the important role played by Energy UK as a member of the national WLG, given that access to water is essential for the delivery of the power sector’s critical infrastructure role.</p> <p>Historic England would like to be considered for membership of the WLG.</p> <p>The national WLG is probably missing some catchment scientists from an academic background to drive an evidence-based discussion and a representative body of planning authorities or urbanisation expert.</p>	
<p>Local enterprise partnerships</p> <p>Local enterprise partnerships (LEPs) are putting forward plans for strategic growth, but are not well integrated into catchment partnerships. Better engagement with them and local planning would be of use.</p> <p>Local planning authorities specifically need to be involved as do LEP's</p>	<p>We recognise that local and combined authorities, local enterprise partnerships and local nature partnerships are key stakeholders that need to be engaged with. This includes working with them to embed maintaining/improving the water environment in local development plans and other plans for growth. We are working with local staff to highlight the value of this engagement.</p> <p>We continue to work with partners through the Catchment Based Approach National Support Group (urban sub-group) to provide guidance and case studies to catchment partnerships on engaging LEPs in catchment management.</p>
<p>River basin district liaison panels</p> <p>The key organisations appear to be covered within the document,</p>	<p>We originally established river basin district liaison panels to discuss and</p>

<p>however there is no mention of river basin district liaison panels, which include representatives of key sectors and catchment partnerships that play key roles in implementing measures and carrying out projects</p>	<p>influence the development of river basin management plans and assist with their implementation. Given the emphasis on catchments and local delivery, we decided that the focus for delivery should be through the 14 Environment Agency operational areas, rather than at a river basin district scale and in 2016 withdrew support for running the liaison panels. The focus now is on delivering this work at an area and catchment scale through existing engagement mechanisms.</p>
<p>Canals Organisations like the Canal and River Trust have no remit for water quality in their business plans - this should be addressed as many issues derive from the canals or reservoir.</p>	<p>The Environment Agency is main competent authority, but all interested parties need to deliver it. River basin planning has been developed into the catchment based approach to integrate the approach taken locally.</p>
<p>Lead local flood authorities Although there is an opportunity to input via members of lead local flood authorities, relevant county, unitary and district councils need to be notified in their own right of the various consultation opportunities. This may be implied above but just wanted to be sure this is so given these councils have remits beyond flood matters e.g. strategic and environmental matters covering transport, public rights of way, waste, minerals, historic environment and biodiversity.</p>	<p>In relation to flood risk management, the need to engage with lead local flood authorities is already confirmed in the river basin management plan, and we are working internally with Environment Agency flood and coastal risk management colleagues to ensure that there is joined up engagement throughout the river basin management and flood risk management planning processes. We acknowledge that local and combined authorities have a broad remit that is essential to ensuring there is integrated working across the catchment. We will aim to engage widely across these joint areas of interest in developing the plans.</p>
<p>Water and sewerage undertakers ...we think that water and sewerage undertakers should be referenced specifically in 'working with others' rather than just through Water Leaders Group and through our catchment partnerships.</p>	<p>We agree that this should be the case for the challenges and choices consultation and suggest using the words 'water only companies' and 'water and sewerage companies'.</p>

<p>Catchment partnership funding</p> <p>Our catchment partnership is pleased to see that it will have a role in the delivery of the next river basin management plans. However, to continue this role it is essential that timely host funding commitments are made for the period of the lead up to the updated plans and for the period of the plans themselves. That is guaranteed host funding 2018 to 2027.</p>	<p>We acknowledge that the activities of catchment partnerships, including lake, groundwater, estuarine and coastal partners, are fundamental to catchment management. We are working closely with the Catchment Based Approach National Support group to consider how this work is most appropriately resourced.</p>
<p>Engagement with general public</p> <p>There is also little reference to public engagement in the consultation document and this should be a focus for the catchment groups (as many of them are already doing) to engage local communities in both defining the problems and delivering solutions.</p>	<p>We learnt from cycle 2 that the plans need to be more engaging and understandable for all. We hope the updated plans will be more accessible and engaging. They will also be more web based than the current plans, with much of the content accessed via the catchment data explorer (CDE).</p> <p>We will also work with catchment partnerships to raise awareness and encourage participation of the public in the process.</p>

3.3.6. Other organisations suggested for inclusion include

You suggested a number of other organisations for inclusion in the process of reviewing and updating the river basin management plans. We have contacted all these stakeholders and given the opportunity to feed into this or future consultations.

- Academia
- British Ecological Society
- Agricultural and Horticultural Development Board (AHDB)
- Agrochemical manufacturers, for example, Association of Inland Navigation Authorities, Bayer, Syngenta, BASF
- Agronomists - Agricultural Industries Confederation (AIC)
- Amenity and recreation, including golf sector and equestrian sector
- British canoeing
- Campaign for National Parks
- Centre for environment, fisheries and aquaculture science (Cefas)
- Crop irrigation industry

- Crop Protection Association
- Food Standards Agency (FSA)
- Grass route community groups
- Housing development bodies
- Hydropower sector
- Keep Britain Tidy
- Ministry of Housing, Communities and Local Government
- National parks
- Natural capital commission
- NHS - clinical commissioning group (social prescribing committee)
- Outdoor swimming society
- Ramblers
- River restoration centre
- Septic tank manufacturers and associated industries
- Shellfish Association of Great Britain
- Small businesses
- Sport England
- Surfers Against Sewage
- Tenant Farmers Association
- Wild Trout Trust
- Wildfowl and Wetlands Trust
- World Heritage Site representatives

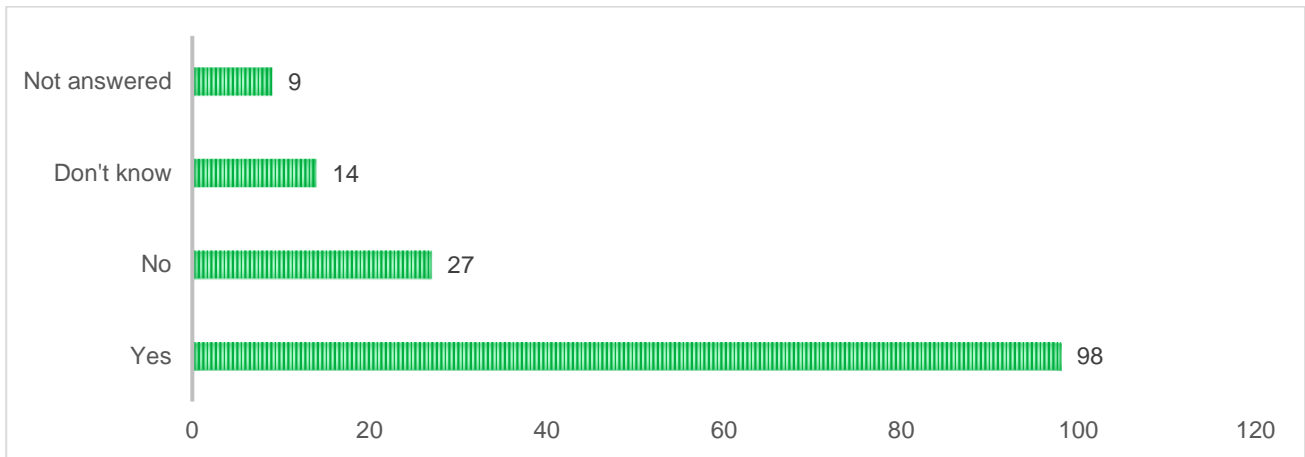
3.4. Do you know how to get involved?

3.4.1. Consultation question 5

We asked at the end of the consultation process whether you now knew how to get involved with the review and update of the plans.

98 of 148 responders (66%) stated that they did; 27 (18%) said they did not (Figure 9).

Figure 9: Do you know how to get involved in the review and update of the river basin management plans?



The table below summarises the key points raised by the question 5 consultation responses and the action/response that we are considering as a result.

Q5: Now that you have read this consultation, do you know how to get involved in the review and update of the river basin management plans?	
Example/summary of your response	Our action/response
<p>Catchment partnership engagement</p> <p>This consultation has set out the timetable, but not the 'how' catchment partnerships will be able to get involved. Will there be meetings, communications or other methods of providing input for example? Simply sending out an online consultation such as this one can seem daunting and reduce the likelihood of people responding.</p> <p>Will appreciate more guidance from the Environment Agency, particularly on how the catchment partnerships can both support and be engaged with the consultation process.</p> <p>Of the 5 catchment groups I was invited to be involved in</p> <p>(1) all have met in normal working hours, so working people find it very difficult to attend</p> <p>(2) one group appears to be moribund</p>	<p>River basin management plans are strategic plans that can shape and influence policy, mechanisms and funding for actions that protect and improve the environment. By engaging in river basin planning, partners can directly influence these outcomes. The plans also contain the statutory objectives for the water environment, and our partners should use these objectives to help to target their own activity and actions.</p> <p>We are working with the Catchment Based Approach National Support Group and local catchment partnerships to determine how best they should be involved in the engagement process for river basin planning 2021.</p> <p>We recognise that the some sectors are often under represented on catchment partnerships. This has been raised at the Water Leaders Group and we are working with catchment partners to highlight this and</p>

<p>(3) 2 or 3 of the groups do not appear to have the administrative resources to begin to grapple with the catchment issues (I would say 3 groups, but as one is moribund it is hard to tell what its problems are).</p>	<p>encourage inclusivity and representation on catchment partnerships.</p>
<p>Cross-border issues</p> <p>The consultation appears to tell me nothing about how to get involved with the consultation for the Severn river basin district. The Natural Resources Wales consultation is clear in asking whether we wish to be involved and recording our details for future contact. You do not appear to be asking the same question or making the same offer.</p>	<p>We are taking a different approach to the consultation to Natural Resources Wales. The working together consultation did not focus specifically on individual river basin districts but asked general questions. Where responders have referenced a specific river basin district we shared this information with our local catchment co-ordinators to ensure that the comments are taken into consideration.</p>
<p>Local involvement</p> <p>It is unclear how the process moves forward at a local scale.</p>	<p>We are working with catchment partnerships to determine how best to involve all in the process for river basin planning 2021.</p>
<p>Agriculture sector</p> <p>Whilst we know how to get involved and will endeavour to involve our sector more, we feel the Environment Agency needs to do more to ensure that farmers and rural businesses are proactively engaged and welcomed in relevant conversations about catchment management.</p>	<p>We continue to work with the agriculture industry leads and local catchment partnership to engage with farmers, landowners and rural businesses to highlight the importance of clean water and the importance of improving the local environment.</p> <p>The 'priority catchment' projects, set up under water abstraction plans, are a recent example of catchment scale engagement with farmers and local landowners.</p>
<p>Ports</p> <p>For organisations such as ports, who often have interests in more than one coastal or transitional waterbody and in some cases have much to offer to the WFD implementation process, it is very difficult to know how to get involved in an effective and meaningful way.</p>	<p>We are keen to continue our engagement with the ports sector through our Water Leaders Group, the UK Major Ports Group and the British Ports Association to identify mutually beneficial ways the sector can engage and support river basin planning. We welcome further discussion as how this might be improved.</p>

4. Summary of engagement for individual river basin districts

4.1. England (all river basin districts)

We received 26 responses for the whole of England and all river basin districts. 3 individuals responded and 23 organisations. These included Cefas, Thames Water, Blueprint for Water, Consumer Council for Water, Marine Management Organisation, Agrii, Agricultural Industries Confederation, National Farmers Union, Canal & River Trust, Inland Waterways Association, Associated British Ports, The Rivers Trust, The Wildlife Trusts, River Eden and District Fisheries Association, National Parks England, Energy UK, EDF Energy, Local Government Association, Sea Fish Industry Authority, Historic England and Food and Drink Federation.

4.2. Anglian

To raise awareness of this consultation we contacted Essex Rivers Hub, Cam Valley Forum, Anglian Water and CambsACRE and all 43 MPs in East Anglia. We also informed the Upper and Bedford Ouse catchment partnership and the Old Bedford and Middle Level catchment partnership and used Twitter to inform 1173 followers.

22 responses were received for the Anglian river basin district working together consultation. Of these, three were from individuals and 19 from organisations including two water companies (Anglian Water and South Staffs Water), two wildlife trusts (Norfolk and Lincolnshire), two catchment partnerships (the Old Bedford and the Upper and Bedford Ouse), three local authorities (Suffolk county council, Bedford borough council and the Broads authority), Natural Cambridgeshire, Eastern Shore Fisheries and Conservation authority, Middle Level Commissioners, East Suffolk Water Abstractors Group, East Anglian National Farmers Union (NFU), Chilterns Conservation Board and Peel Ports Group.

4.3. Dee

[Natural Resources Wales](#) leads on the review and update of the plan for the Dee river basin district.

4.4. Humber

We sent over 100 emails and informed participants of the consultation at 60 different meetings with catchment partnerships, councils, wildlife trusts, rivers trusts, water companies and others.

22 responses were received for the Humber river basin district. 6 were from individuals and 16 from organisations, including 2 water companies (Yorkshire Water and South Staffs Water), 3 wildlife trusts (Lincolnshire, Staffordshire and Derbyshire), 2 catchment partnerships (River Idle and Staffordshire Trent Valley), Rushcliffe borough council, NFU North East, The Friends of Bilbrook, Associated British Ports and the Eastern Inshore Fisheries and Conservation Authority.

4.5. North West

We sent emails to catchment hosts for further circulation within their members, and the consultation was highlighted in 22 meetings with borough and county councils, wildlife trusts, rivers trusts and catchment partnerships.

We received 20 responses for the North West river basin district from 5 from individuals and 15 organisations. These included United Utilities, 3 local authorities (Lancashire county council, Stockport council and Lake District National Park Authority), 2 rivers trusts (West Cumbria and South Cumbria), Staffordshire Wildlife Trust, Irwell catchment partnership, Greater Manchester Ecology Unit, Bollin Valley Partnership, Peel Ports Group, Natural Course EU LIFE⁷ Integrated Project and NFU North West.

4.6. Northumbria

The consultation was highlighted at the Tees, Wear, Tyne and Northumberland catchment groups and at a Northumberland Rivers catchment partnership meeting.

We received 11 responses for the Northumbria river basin district working together consultation from organisations including Northumbrian Water, Redcar and Cleveland Council, the Tyne Rivers Trust, Northumberland Inshore Fisheries and Conservation Authorities, NFU North East Region and Robson Thomas Limited.

4.7. Severn

The consultation was highlighted at meetings with 7 catchment partnerships and also the University Centre Shrewsbury.

There were 21 responses made to the Severn river basin district. 6 responses were from individuals, including an academic researcher. The remaining 15 were from organisations including 3 water companies (Welsh Water, South Staffs Water and Wessex Water), Warwick district council, Shropshire Hills Area of Outstanding Natural Beauty, Cotswold Conservation Board, NFU West Midlands region, Bristol Avon catchment partnership, Staffordshire Wildlife Trust and Canoe Wales.

4.8. South East

To promote the consultation, we engaged through emails and meetings with 5 catchment partnerships, the Hampshire and Isle of Wight Wildlife Trust, the Solent Forum, New Forest Water Forum and the Sussex Marine and Coastal Forum.

18 responses were received for the South East river basin district, 4 were from individuals and 14 from organisations. The organisations who responded included 3 water companies (South East Water, Portsmouth Water and Southern Water), 4 authorities (South Downs National Park Authority, Kent county council, Fareham borough council and Harpenden town council), NFU South East, Arun and Western Streams catchment partnership, Groundwork South, Hampshire and Isle of Wight Wildlife Trust, South East Rivers Trust and Peel Ports Group.

4.9. South West

We promoted the consultation via meetings and emails with rivers trusts, catchment partnerships, Areas of Outstanding Natural Beauty, ports, estuary forums, wildlife trusts and local councils.

There were 15 responses for the South West river basin district. There was a single individual response and 14 organisations who responded. They were 3 water companies (Wessex Water, Bristol Water and South West Water), 2 catchment partnerships (Somerset and the Tamar and South Devon), West Country Rivers Trust, Exe Estuary

⁷ <https://ec.europa.eu/easme/en/life>

Management Partnership, Two Valleys Community Energy, Somerset Wildlife Trust, Borough of Poole, South West Rivers Association, Grand Western Canal Country Park and the Frome, Piddle and West Dorset Fisheries Association.

4.10. Thames

We promoted the consultation at 4 meetings including Affinity Water's customer challenge group and the Cherwell, Upper Thames and Windrush catchment partnerships. We also contact the Loddon Fisheries and Conservation Consultative.

There were 29 responses for the Thames river basin district with 3 individuals and 26 organisations responding. The organisations that responded included 2 water companies (South East Water, Southern Water), 2 authorities (Kent county council, Surrey county council), 6 catchment partnerships (Kennet, Maidenhead to Teddington, Luton Lea, Roding, Bream and Ingrebourne, Colne Catchment Action Network, and London based catchment partnerships), 3 wildlife trusts (London, Herts and Middlesex, and Hampshire and Isle of Wight), NFU South East, Peel Ports Group, Chilterns Conservation Board, Thames Valley Angling Association, Thames Regional Flood and Coastal Committee, Cotswolds Conservation Board, Thames21, Loddon Fisheries and Conservation Consultative, South East Rivers Trust and the Marsh Dykes and Thamesmead Catchment Improvement Group.

4.11. Solway

The [Scottish Environment Protection Agency](#) leads on the review and update of the plan for the Solway Tweed river basin district.

5. Next steps

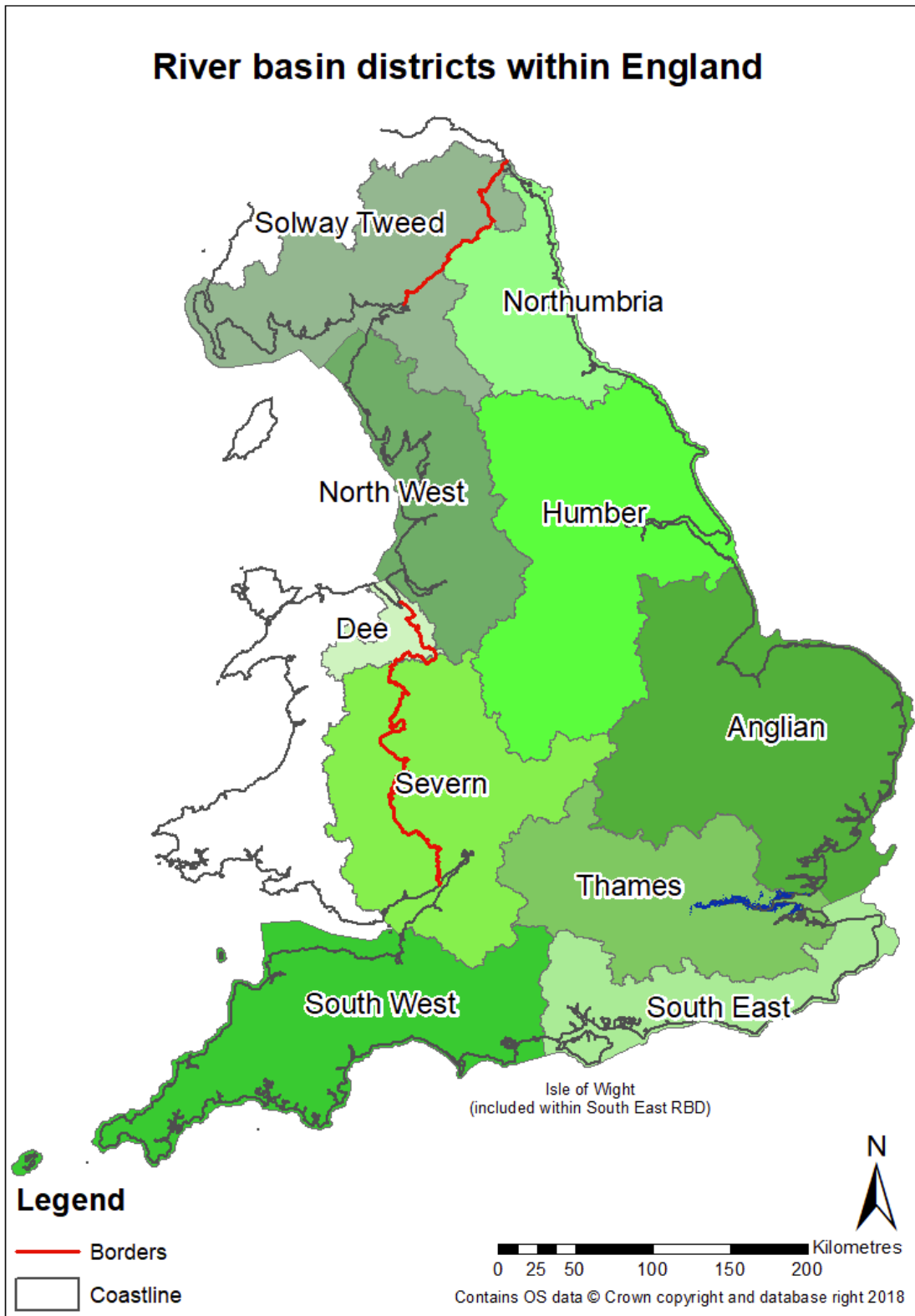
Working together is the first consultation reviewing and updating the river basin management plans for 2021. Its purpose is to set out the steps and consultation measures to necessary in preparation for updating the plans. The responses to this consultation will help shape the 2021 river basin planning process. We will take into account all consultation responses before finalising our plans for the review and update of England's river basin management plans.

As discussed in section 3.2.2, we have taken the decision to slow the current phase of work to update the river basin management plans. The new timetable moves the consultation on challenges and choices back by 5 months and the consultation on the draft plan back by 4 months. However, the date for publishing the plans (December 2021) remains the same.

6. Appendices

6.1. River basin districts - England

Figure 10



6.2. New timeline and steps for updating the river basin management plans

Stage	Date	Purpose
Working together consultation	June 2018 to December 2018 6 months	<p>How should we all work together to update the river basin management plans?</p> <ul style="list-style-type: none"> explains the key steps in the river basin planning process asks how you want to get involved
Engagement	Ongoing	Where there are areas which need to be resolved or clarified following the working together consultation, we will facilitate further engagement with relevant stakeholders.
Challenges and choices consultation	October 2019 to April 2020 6 months	<p>Have the significant issues and the challenges in tackling them been identified? What can be done about them?</p> <ul style="list-style-type: none"> summarises the significant water management issues and shares the latest evidence seeks views on prioritising action and agreeing what additional approaches are needed
Engagement	Ongoing	We will consider the responses to the challenges and choices consultation. Where there are areas which need to be resolved or clarified we will facilitate further engagement with relevant stakeholders
Draft update to the river basin management plans consultation	October 2020 to April 2021 6 months	<p>Does the draft plan set the right level of ambition for the water environment and a strong commitment to deliver?</p> <ul style="list-style-type: none"> proposes changes to waterbody objectives estimates the likely state of the environment by 2027 outlines who will be involved to achieve these outcomes, how much it will cost and the benefits
Engagement	Ongoing	We will consider the responses to the consultation and where necessary further develop the content of the plans with delivery partners to ensure the updated plans are the best possible and fully supported.
Updated river basin management plans published	December 2021	<p>This is the plan to address the issues</p> <p>The proposed plans will be submitted to government for approval in September. The approved plans will be published in December.</p>

6.3. Representatives on the Water Leaders Group [2018]

Representatives on the Water leaders Group

Angling Trust	Country Land and Business Association (CLA)	Mineral Products Association	RSPB (representative for Blueprint for Water)
Association of Directors of Environment, Economy, Planning and Transport	Defra	National Farmers' Union	Salmon and Trout Conservation UK
Association of Drainage Authorities (ADA)	Energy UK	National Trust	Shellfish Association of Great Britain
Association of Inshore Fisheries and Conservation Authorities	Environment Agency	Natural England	The Rivers Trust
Canal & River Trust	Forestry Commission	Ofwat	United Kingdom Major Ports Group
Coal Authority	Highways England	Regional Flood and Coastal Committees	Water UK
Coastal Partnerships Network	International Navigation Association	Renewable UK	Wildlife Trusts
Consumer Council for Water	Marine Management Organisation	Royal Yachting Association (representative for Sport and Recreation Alliance)	World Wide Fund for Nature

6.4. List of all organisations that responded

Agricultural Industries Confederation	Eastern Inshore Fisheries and Conservation Authority (IFCA)
Anglian Water	Bristol Water
Arun & Western Streams Catchment Partnership	Bristol Avon Catchment Partnership
Associated British Ports	Canal & River Trust
Bedford Borough Council	Broads authority
Blueprint for Water	Canoe Wales
Bollin Valley Partnership	Frome, Piddle and West Dorset Fisheries Association
Borough of Poole	Redcar and Cleveland Council
Chilterns Conservation Board	Derbyshire Wildlife Trust
Colne Catchment Action Network	Exe Estuary Management Partnership
Herts and Middlesex Wildlife Trust on behalf of Upper and Lower Lea Catchment Partnerships	Host of Tyne Catchment Partnership, Tyne Rivers Trust
Consumer Council for Water	Dŵr Cymru Welsh Water
Cotswolds Conservation Board	Fareham Borough Council
EDF Energy	Energy UK
Food and Drink Federation	Grand Western Canal Country Park
Greater Manchester Ecology Unit	Harpenden Town Council
Groundwork South	Hampshire & Isle of Wight Wildlife Trust
Historic England	Lincolnshire Wildlife Trust
Irwell Catchment Partnership	Kennet Catchment Partnership
Kent County Council Flood Risk Management	Lake District National Park authority
Lancashire County Council LLFA	Natural Cambridgeshire
Local Government Association (LGA) Coastal Special Interest Group (SIG)	Natural Course EU LIFE Integrated Project
Loddon Fisheries and Conservation Consultative	Marsh Dykes and Thamesmead Catchment Improvement Group
London based catchment partnerships	Luton Lea Catchment Partnership
London Wildlife Trust	Middle Level Commissioners
Maidenhead to Teddington Catchment Partnership	Old Bedford including Middle Level Catchment Partnership
National Farmers Union (NFU)	NFU East Anglia

National Parks England	
NFU North West	NFU North East
NFU West Midlands	NFU South East
Norfolk Wildlife Trust	Shropshire Hills AONB Partnership
Northumberland IFCA	River Eden & District Fisheries Association
Northumbrian Water	Portsmouth Water
Nuffield Farming Scholar	Robson Thomas Ltd
Peel Ports Group	The Inland Waterways Association
River Idle Catchment Partnership	Roding, Beam & Ingrebourne Catchment Partnership and the South Essex Catchment Partnership
Rushcliffe Borough Council	South Tyneside Council
Sea Fish Industry Authority	Thames Regional Flood and Coastal Committee
Somerset Catchment Partnership	Staffordshire Trent Valley Catchment Partnership
Somerset Wildlife Trust	South Downs National Park authority
South Cumbria Rivers Trust and The Rivers Trust	South East Rivers Trust
South East Water	South Staffs Water
South West Rivers Association	Thames Valley Angling Association.
South West Water	Southern Water
Staffordshire Wildlife Trust	Thames21
Stockport Council	Suffolk County Council LLFA
Surrey County Council LLFA	Warwick District Council
Tamar and South Devon Catchment Partnerships	Upper & Bedford Ouse Catchment Partnership
Thames Water	United Utilities
The Centre for Environment, Fisheries and Aquaculture Science (Cefas)	Marine Management Organisation
The Friends of Bilbrook	Two Valleys Community Energy
The Rivers Trust	Tyne Rivers Trust
The Wildlife Trusts	
Wessex Water	Yorkshire Water
West Cumbria Catchment Partnership	West Cumbria Rivers Trust
West Country Rivers Trust	

7. Glossary

River basin district (RBD)

These are large river catchments in England, Wales and Scotland and we report at this scale to the European Commission. They cover an entire river system, including river, lake, groundwater, estuarine and coastal waterbodies.

River basin management plan (RBMP)

River basin management plans set out how organisations, stakeholders and communities will work together to achieve an improved water environment for each river basin district.

Regional Flood and Coastal Committee (RFCC)

These are regional committees made up of a government appointed chairperson, local councillors and people with special and relevant skills that make decisions about regional funding for flood defences.

Scottish Environmental Protection Agency (SEPA)

The Scottish Environmental Protection Agency is Scotland's principal environmental regulator, protecting and improving Scotland's environment. They lead on producing the Solway river basin district plan, including the geographic area within England.

Water Framework Directive (WFD)

The Water Framework Directive (2000/60/EC) (WFD) was adopted in 2000 and provided a common framework for water management and protection in Europe.

The obligations of the WFD are set out in our domestic law, principally the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

Catchment Based Approach (CaBA)

This approach can provide multiple benefits for all the partner organisations and the local community, including reducing flood risk whilst also cleaning up pollution, protecting drinking water resources, improving biodiversity and improving the health and recreation for local communities.

Natural Resources Wales (NRW)

Natural Resources Wales are a Welsh government sponsored body. Their purpose is to ensure that the natural resources of Wales are sustainably maintained and enhanced. They lead on producing the Dee river basin management plan, including the geographic area within England. The Environment Agency leads on the Severn river basin management plan.

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