

RIVER CATCHMENT MANAGEMENT – ITS ORIGINS, CURRENT PRACTICE AND AS AN ENGINE DRIVING THE PROVISION FOR CLEAN AND PLENTIFUL WATER

THE OBSERVATIONS OF THE WORSHIPFUL COMPANY OF WATER CONSERVATORS FOR A FUTURE TEMPLATE: FIRST EDITION MAY 2023 SECOND EDITION JULY 2024 BRIEFING NOTE

1 The Worshipful Company of Water Conservators was invited to share its thinking on catchment management with Defra after the publication of the Water Plan by the previous government. It was intended to provide a deep and broad perspective on the origins, current practices and future of catchment management. Whilst there have been a number of tactical initiatives, including significant investments and much has been written, there is still no formal strategic framework of the ilk suggested by the WCWC. Nothing which has occurred changes the thrust of the first edition of this think piece document. So in view in of the intense interest in what is going to transpire on water management, the WCWC has produced a second edition with a summary of some of the subsequent initiatives, which is posted under Thinkpieces on the website.

2 In preparing the documents a great deal of research was conducted. This revealed the complexity of initiatives and sources of information. In fact, too many to comprehend in one go. And there are different bodies involved often with less than obvious cross connections. The overarching finding is that there are too many schemes, too many sources of information. There is an urgent need to bring all the data sources together in one place, or at least one place, from which all the data sources are accessible. Doing this should be part of the ‘joining up’ and ‘coordination’ envisaged in the Water Plan. It is worth emphasizing that where the concept of water resources is referred to, this includes groundwater abstractions which can affect river flows and must be embraced in catchment planning.

Thus, the WCWC suggest that there is a need for a national template. This should comprise two layers of planning:

Administrative Catchment Plans for objectives, targets and data sources:

3 There needs to be greater clarity of separation between what the targets are and how they will be delivered. So, the headline Administrative Catchment Plans are where the targets for the Water Environment Regulations of 2017 (WER, 2017), nutrient reduction programmes, Nature Recovery Plans etc., are set out. This is also probably the best place for other data such as water resources, flood risk, river levels, river water quality, Status compliance, etc., are placed (or at least with links to those data sources). And the WCWC suggests that Administrative Plans should be driven by the Environment Agency (EA) and Natural England (NE) in partnership, but maybe hosted by the EA. This template should apply across the country.

4 From these it will be possible to achieve greater integration of regulation by the Environment Agency and Natural England. Control of discharges can be determined by catchment models. These Plans will have to be managed with the principles of 'Big Data', as the WCWC has already opined in response to the consultation on the monitoring of discharge impacts, as per S81 and S82 of the Environment Act 2021

(<https://www.waterconservators.org/wp-content/uploads/Monitoring-18.2-May.pdf>).

And the last few months has focused increasingly on monitoring of rivers and discharges and the accessibility and understandability of the data obtained. The WCWC in working with CIWEM has advocated integrated monitoring governance which should be linked to catchment plans . This would involve treated sewage effluent monitoring , Event Duration Monitoring of storm overflows , programmes executing the requirements of S82 of the 2021 Environment Protection Act and sewage flows .It has been suggested that these programmes should be constructed in ways which comply with the principles of Quality Assurance under the jurisdiction of an Effluent Quality Assurance Manager in each company with a status some what similar to that of a Health and Safety Manager

Operational Catchment Plans for local tailored delivery:

5 The Administrative Plans should have links to the Operational Catchment and Water Body delivery planning and each should have a Delivery Partnership interfacing local community and business interests with Delivery Plans. Water Companies may act alone through the Water Industry Environment Programme WINEP or as part of local Catchment Delivery Partnerships. This builds on what is happening now. There is a need for greater consistency of Delivery Partnerships planning across the country and it seems reasonable that the Catchment-Based Approach (CaBA) is the organisation to deliver further Guidance. It is suggested that there would be value in developing a framework of best practice which would provide the balance of consistency suggested by 'joining up' and 'coordination' in the Water Plan, whilst allowing for 'local tailoring.'

An enhanced role for CaBA the organisation:

6 CaBA as an organisation should be rebranded as an Alliance of Delivery Partnerships, perhaps the CaBAA. It will continue to provide support to local Delivery Partnerships. The operational plans will be where the responses to Local Nature Strategies needs will be addressed. It would sensible if the CaBAA hosted an archive of plans so that best practice was visible to all and may even facilitate bench marking. The WCWC suggests that this should be a done as quickly as possible.

Other issues

7 The Water Plan envisages that Catchments will be 'engines' which are drivers of the Water Plan, but that Plan, and indeed practical experience shows, that any Catchment Plans must include land management, as, indeed, occurs now in many places .There is an argument that in, due course, catchments will play a much bigger role across all interests of environmental management, including planning, with, as a minimum, links to all the initiatives, site overlaps and strategies relevant to the catchment. The experiences of Natural Resources Wales (NRW) in moving forward the notion of Catchment Based Integrated Natural Resources Management might be a useful reference (<https://naturalresourceswales.gov.uk/about-us/what-we-do/sustainable-management-of-natural-resources/?lang=en>).

8 One point which needs addressing urgently is local community engagement in what the uses of water bodies are, is important and formed part of past water quality programmes. The Environment Agency and Natural England must be informed about local views. This will be challenging to organise and is worth some further debate. The EA and NE could go to local consultation direct or could use Catchment Delivery Partnerships. The WCWC suggests that the latter might be preferable. This would replace the current programmes of consultation on uses such as for bathing waters. It is suggested that support should be offered to Catchment Delivery Partnerships to apply stakeholder engagement best practice. This needs to be resolved if the Water Plan is to achieve wide spread understanding and engagement.

9 There is a need, as the Environment Agency has suggested, to review the reporting metrics of compliance. They may face some challenges in communication. An even greater challenge will be the issue of creating a set of criteria, particularly quality criteria, for a water body which reflects the uses of that water. This will require greater clarity about what uses are part of the water planning framework and the associated criteria, including habitat protection. More local water body standards are needed, which might involve a review by the UK Technical Advisory Group on the Water Framework Directive (UKTAG). This would form a part of the regulatory streamlining and may take some time to implement, but greater coherence can be brought more quickly to what is done now. A major dilemma as highlighted in the Water Plan, for example, is that Chemical Status is driven by compliance of determinands not affected by sewage or agriculture.

10 Much is made about 'nature-based solutions' (NBS) within catchments, with offsets and nutrient credit trading as opposed to hard technology solutions. These innovations should be supported within catchments, but there is a current push towards 'end of pipe solutions' which may be counter-intuitive, although NBS can be used as an 'end of pipe' approach. It can be argued that Catchment Management is THE overarching NBS in a catchment and that all the nature based schemes fit in under this concept. This came out in the highlight debate organised by the WCWC in Bakers Hall in March 2024. The summary of the Debate published in CMS Water News in April 2024.

11 Does the 'Catchment Movement' have any role in advocacy for good practice in catchment management, possibly with the CaBAA acting almost like sector body? There are many topics in which the Catchment Sector could play a useful role. Could it advocate for example that one way of reducing phosphate in sewage is to reduce its excessive use in food products. What view can it contribute in the current tussle over Farming Rules for Water. Partnerships could provide useful insight into sustainable practices of uses of manure and biosolids which avoid the reintroduction of high carbon emission processes?

12 The WCWC has suggested several times that there is a need to recognise that every person has a role to play in delivering clean and plentiful water and it has termed this citizen delivery. The Water Plan recognises this, but what role can the CaBAA nationally or as 'Catchment Partnerships' locally, fulfil? For example, should it be left just to the Water Companies to promote 'Bag it and Bin It' for used sanitary products or can the Catchment Partnerships play a role? Can they likewise help in reducing water demand? A new dynamic is the proposal to by Ofwat to set up a new national body to promote water use efficiency.

Next steps

13 The evolution of catchment planning must start with the 100 or so administrative catchments identified already and build on what is being done. But there are some changes needed. The WCWC suggests that the ‘Catchment Revolution’ comes in two phases.

14 **First**, a fairly quick fix in the initial Administrative Plans, making understanding, and access easier, and to bring greater coherence in the current system of setting out targets and making relevant information available. And it is suggested it would be very useful to come to an understanding as to how the CaBAA can play an enhanced role in improving delivery, coordination and tailoring of Delivery Plans. The WCWC suggests that there is an urgent need to set up an archive of existing Partnership activities

15 **Second**, a more radical look at what is expected within catchments with changes which might be associated with regulatory streamlining.

16 The WCWC is not suggesting any initiative which makes Catchment Plans too big to handle. Whatever happens next has to confront the complexity behind the Water Plan notion of ‘joined up water management in catchments.’ This approach could be formalised in due course in whatever Regulations emerge from the review of the Water Environment Regulations 2017 as part regulatory streamlining. A key suggestion from the WCWC is that there is an urgent need to update the 2013 Defra Guidance on catchment management, which could incorporate some of the ideas set out in this paper and the WCWC would be ready to help. Whatever approach is adopted, it will probably follow a period of urgent consultation.

17 To illustrate the WCWC suggestions, for clarity, a diagram is provided on the next page .

18 The WCWC recognises that these proposals are not dissimilar to those of the advocacy group SSWAN ,which proposes a four-tier regulatory framework:

Government: sets national policies and targets.

Regulators: accountable for ensuring the delivery of the outcomes set by government. They would regulate outcomes in individual water catchments, with localised targets tailored to individual catchments and reflecting local needs.

Catchment Advisory Boards (CABs): ensure the local objectives reflect local priorities, empowering local government and communities to provide tailored guidance to the regulators.

Joint Area Teams (JAT): determine catchment-specific short and long-term outcomes, setting targets and defining the monitoring requirements for each catchment.

SSWAN states that this new model will enable a fundamentally different way of working and has the potential to unlock innovation and improve partnership collaboration. The potential benefits are substantial. For more information read the SSWAN Discussion Paper. It suggested that A new parliament should initiate regulatory reform to:

1. Set river health targets at a national and catchment scale, ensuring the policy levers and incentives are in place to reduce pollutants and deliver targets locally.
2. Link investment and targets across water quality, nature recovery, carbon, and climate to create new sources of funding.

3. Ensure pollution is accurately apportioned to those responsible with detailed and transparent monitoring carried out by public bodies.
4. Establish independent Catchment Advisory Boards to facilitate local decision making and deliver targets efficiently.
5. Resource the regulators to drive compliance and sufficient investment in the water system, using existing enforcement tools.
6. Set a framework to deliver long-term resilience, established by an independent body, and requiring water companies and regulators to deliver against the framework.

Diagram of the System proposed by the WCWC

