



## **Environment Agency Challenges and Choices Consultation**

*Response from the Ock Catchment Partnership*

April 2020

### **Climate and Biodiversity**

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

Better protection of high quality freshwaters, through: funding for surveys and analyses to identify Important Freshwater Areas; funding for projects and practical work to ensure these areas are appropriately managed to maintain their high-quality status, and statutory protection of all high quality freshwaters, regardless of size (e.g. inclusion of small waters such as ponds, headwater streams, flushes, springs etc. in addition to the larger rivers, streams and lakes that are currently included in the Water Framework Directive).

Increase the resilience of the water environment to climate change and additional threats by building out from the best freshwater areas (creating high quality freshwater habitats, such as clean water ponds, and restoring degraded freshwaters and wetlands) to link together existing high quality freshwater habitats and create a Freshwater Network.

Climate change is set to increase the frequency and intensity of flood events. Funding the installation of NFM measures in suitable locations may help to reduce or delay peak flows downstream.

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

Increase the resilience of the water environment by safeguarding all types of freshwater habitats, including the all-important small waters – ponds, headwater streams, flushes, springs, small lakes – and ensure they are effectively monitored. Identify the highest quality freshwater areas and build out from these, creating high quality freshwater habitats (such as clean water ponds) and restoring degraded freshwaters and wetlands to link together existing high quality freshwater habitats and create cleaner, wetter and wilder floodplains to establish the Freshwater Network. This will also give rise to 'wildlife corridors', which will help to create a more connected landscape for biodiversity (not just freshwater species). Address the issue of widespread water pollution by creating new, clean water, freshwater habitats

(such as clean water ponds), which can support sensitive species that have declined due to loss of suitable clean water habitat.

Large-scale tree planting to ameliorate flooding and to help capture carbon – although trees should be planted i) in appropriate places, e.g. not on peat bogs or directly next to riverbanks, and ii) to benefit biodiversity, i.e. not just a monoculture, but a range of native/naturalised species that can support a variety of species (birds, invertebrates, lichens, etc.). Tree-planting offers the chance to create reasonable habitat for woodland species in addition to flood protection and carbon capture, and this opportunity should not be missed.

Protect riparian habitat with stricter policies and enforcements on riverside development and poor agricultural practice, to help reduce both water pollution and damage to the structural integrity of riverbanks. For example, currently EU legislation requires buffer strips to have a minimum width of 2 m (from bank top). However, growing evidence shows that there is a high degree of variability in the effectiveness of buffer strips (e.g. Sawatzky and Fahrig, 2019; Prosser *et al.* 2020), and this is influenced not just by their width but by other factors such as soil composition and structure, plant community and runoff intensity (Prosser *et al.* 2020). There needs to be a system change in order to recognise this, and a new approach could be incorporated into the upcoming Environmental Land Management Schemes (ELMS).

The current policy regarding spoil placement from practical works on floodplains is limiting or, in some cases, prohibitive of environmental improvement works such as wetland creation. If the spoil cannot be relocated within the floodplain, it becomes very costly to remove it off-site, thus becoming cost-prohibitive. If a project is for biodiversity gain (for example, creation of a back water and offline ponds), rather than development, the rules should be less restrictive to encourage such works. For example, this situation prevented wetland creation in front of one of the hides at BBOWT's Chimney Meadows Reserve.

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

There must be a revision of the Water Framework Directive to include small waters, such as ponds, headwater streams, flushes and springs, in addition to the larger rivers, streams and lakes it is currently focused on (as well as parts of the estuarine and coastal environment). There is now indisputable evidence to show the tremendous value of small waters for freshwater biodiversity, yet virtually none of them (e.g. the 500,000+ ponds in the UK) receive statutory protection. This is because the Water Framework Directive was written and implemented before the true value of small waters had been recognised. However, now this has become widely accepted, it is imperative the legislation reflects this, and includes statutory protection for all small waters so that they can be protected and monitored.

We noted additionally that:

- Thames Water has made a commitment to increase funding to work with catchment partnerships on Thames Water sites with the company committing to a 5% increase in biodiversity at 250-300 of their sites overall (there are 8 sites in the Ock).
- The Thames Water water resources management plan – which includes potential development of an Abingdon reservoir – should look at environmental enhancements as part of this plan.

## **Pollution from agriculture**

### **What can be done to address pollution from agriculture and rural areas?**

More effective enforcement is required to ensure farmers are abiding by the rules. This should include farm visits to check they are adhering to requirements, and stricter penalties if they breach these requirements (e.g. considerable fines).

Catchment partnership should integrate with Thames Water Smarter Catchments employing cover crops and metaldehyde trials.

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

Financial incentive is required for some farmers to get on board with environment-focused schemes. For example, in the Ock catchment, farmer engagement by Freshwater Habitats Trust and Environment Agency has shown that engaging with interested farmers is easy, but the ones who are not concerned with environmental issues are harder to engage, and need financial incentive in order to get on board with any schemes or projects that aim to benefit the environment.

In order to engage with less interested farmers, there should be a focus on the most effective measures farmers can implement (evidence led), and then the offer of a financial reward for implementing these. Farmers need to know what measures are making a difference (again, based on evidence), so communication between environmental organisations and research teams and farmers/landowners is extremely important. Continued funding to facilitate farmer engagement and the dissemination of such findings is important.

One Natural Flood Management measure is appropriate soil and land management – funding of training/education events to enable farmers to apply these methods to their own land would be very useful.

At present a Farming Cluster Group does not exist in the Ock. Local farmers recently agreed that such a partnership should be developed.

It was noted that NFU representation would be useful to join the catchment partnership.

## **Physical modifications**

### **What can be done to address the physical modification of our rivers and coasts?**

We note that physical management of river channels is often ineffective and wastes resources. The approach to physical restoration should be redesigned, taking account of the evidence of c.30 years research worldwide on its limited achievements.

### **Giving more space for rivers and coasts to move and adjust naturally will regenerate habitat, improve wildlife and help us adapt to climate change. What can you and others do to support these changes?**

Investigate opportunities to ameliorate road run-off into freshwater habitats with funding from Highways England. Encourage farmers to sell land close or adjacent to streams and rivers so that they could be managed to benefit the freshwater habitats (possibly in conjunction with local councils). Address barriers to fish passage on watercourses within the Ock catchment in conjunction with Environment Agency's obstructions database.

## **Pollution from water industry wastewater**

### **What can be done to address pollution from water industry wastewater?**

More pressure should be applied to water companies through stricter enforcements.

Every effort should be made to reduce the number of streams and rivers which receive treated effluents which, inevitably, lead to water pollution incidents.

### **What opportunities exist for water companies to collaborate with other sectors and organisations on measures to improve the water environment?**

Thames Water have funding available for stakeholders to set up local Outfall Safaris, which use citizen science to identify wrongly-connected drains which are polluting urban rivers.

There should also be more focused and effective efforts to eliminate all sewage effluents from headwater streams.

A partial solution to this problem may come from:

- Rural sewage treatment works – creation of small wetlands
- Creation of larger wetland treatment systems at large STWs (e.g. Littlemore on the edge of Oxford)

## **Catchment partnership working**

### **How can local partnerships become more inclusive and representative of all of the stakeholders within their catchments?**

Going forward, the Ock Catchment Partnership will focus on local landowner engagement, and will engage with the local National Farmers' Union representative to strengthen links between environmental organisations and farmers and landowners. Local partnerships should strive to bridge the gap between environmental organisations and the farming community.

### **How can local partnerships achieve a better balance of public and private funding to support and sustain their environmental work?**

The Ock Catchment Partnership could attempt to secure private funding by approaching local businesses. Currently the partnership is mostly funded through public funds.