

Response ID ANON-NEE3-34A1-4

Submitted to **Challenges and Choices**

Submitted on **2020-09-23 09:06:16**

The water story

1 The way we treat water today will shape all our futures. What changes can you make to improve the water we rely on?

Please input your response in the box below :

RESPONSE BY UKELA (UK ENVIRONMENTAL LAW ASSOCIATION) to The River Basin Planning: Challenges and Choices consultation

The release by the Agency on 17 September 2020 of water quality data (<https://environment.data.gov.uk/catchment-planning/>) showing river status classifications emphasises the urgency of the water quality issues facing waterways in the UK. No English rivers meet 'good' chemical standard and only 14% of rivers meet 'good' ecological standards. The urgent need to improve water quality is the prism through which any discussions of water must take place.

It is important to recognise the linkages between the catchment, freshwater and the estuarine and coastal environments. The UK has international commitments to achieve Good Ecological Status through the Convention on the Protection and the use of Transboundary waters and International Lakes (the Water Convention) and Good Environmental Status through the Convention for the Protection of the Marine Environment of the North-East Atlantic (the OSPAR Convention). Meeting these commitments will be an essential component for building a resilient aquatic system.

While customer-focussed solutions are an important part of the answer to the water challenges set out below, reducing consumption and encouraging retail customers to be more careful in the materials they put down the toilet are only a part of the solution – the Agency's real focus should be on promoting the necessary infrastructure and systemic changes that will be necessary to ensure that there is sufficient water for our needs and that the water which remains in river basins is adequate in quantity and quality from the point of view of habitats and biodiversity. The proposed environmental land management scheme (ELMS) will be an important component of this through rewarding and enabling landowners/farmers that provide public services such as water 'storage' (e.g. through allowing rivers to meander, planting trees and allowing fields to flood).

Ofwat needs to set ambitious leakage reduction targets for water companies, the planning system must require Sustainable Urban Drainage Systems ('SUDS') for all new development (and SUDS should be retrofitted where possible) and, most significantly, water companies must improve water quality in our rivers and wetlands (as set out below). This is consistent with the recent speech of James Bevan on challenges for the water industry (8 May 2019 - <https://www.gov.uk/government/speeches/what-future-for-water-three-challenges-for-the-industry>).

Part of the answer must also be a better-resourced Environment Agency capable and willing to prosecute water companies for permitting breaches and, crucially, capable of imposing and enforcing more onerous requirements on consents for CSOs and other discharges.

Climate and biodiversity crisis

2 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?

Please enter your response into the box below:

Making space for water and landscape scale water management using natural processes are key parts of delivering climate change resilience in the water environment. The UK Government and the Devolved Administrations have committed to the Net Zero target as recommended by the Committee on Climate Change in 2019 in order to prevent, for example, further increases in average temperatures, sea level rise and more extreme weather events with intense rainfall episodes, more floods and droughts with the attendant cost to society, loss of biodiversity and increases in invasive non-native species or disease. To date, only two milestones have been fully achieved out of the 31 set out in the CCC 2019 Progress Report (Available online here: <https://www.theccc.org.uk/uk-action-on-climate-change/reaching-net-zero-in-the-uk/>). Nature based solutions, such as the restoration and enhancement of wetlands, saltmarsh and seagrass habitats, and native oyster reefs, have key roles in carbon sequestration and protecting coastal environments.

The models used by water industry and by the regulators (Environment Agency and Ofwat) should be the subject of robust and continuous consideration and assessment so that whenever the Agency is asked to opine on amending abstraction licences etc it is able authoritatively to set out the impact of climate change on water requirements and water uses.

3 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?

Please input your response in the box below :

It is important to recognise the linkages between the catchment, freshwater and the estuarine and coastal environments, with a holistic approach to management. The value and importance of nature-based solutions in managing our aquatic environments needs to be more fully recognised and taken into account and there must be informal processes based on best practice and education amongst the environmental and agricultural communities. As set out in question 4 (below) the imposition of targets into the Environment Bill should be considered.

4 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?

Input your response to the question in the box below:

We believe that targets should be an important element of any system of water resource management. Targets are a useful mechanism for determining progress

to meeting commitments and to help identify where more work is required. To be effective, however, they must be agreed collaboratively with those expected to deliver them, and have a local focus where necessary.

The Government has recently outlined four priority areas in which legally binding targets in order to measure progress in combating environmental and climate challenges:

- Air quality: To support robust action to improve air quality to reduce public exposure to fine particulate matter.
- Resource efficiency and waste reduction: To increase resource productivity and reduce the volume of residual waste and plastic pollution generated.
- Biodiversity: To restore and create wildlife-rich habitats, increase species populations and to improve marine biodiversity.
- Water: To improve water quality and tackle pollution from agriculture and waste water.

(available online here: <https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets>)

Whilst the Government's 25 year environment plan sets out an ambition to reduce individual water use, and refers to setting a personal consumption target, the opportunity to make provision for reducing water usage has not been taken specifically within the Bill. As the plan notes, an individual uses 140 litres of water a day, on average. For example, Water UK have lamented the failure to introduce a mandatory national labelling scheme for water appliances like dishwashers and washing machines, coupled with minimum standards (Water UK, Environment Bill – Recommendations (6 November 2019). (Available online here: <https://www.water.org.uk/publication/environment-bill-recommendations-by-water-uk/>.)

In addition, the Bill fails to increase the stringency of obligations on water companies, or other organisations, in respect to water resource management. In particular, there are no measures addressing leakage. The Environment Agency have identified that over 3,000 million litres are lost through leakage in England, which is approximately 20% of water into supply, and 'are large enough to have a noticeable effect on the total demand for water.' (Environment Agency, The State of the Environment: Water Resources (May 2018), p 11.) We accept that this may involve the Agency being given statutory powers to enforce against water companies and other organisations who fail to address leakage adequately.

Finally, we suggest that the Environment Bill should also include some form of target in relation to water quality including the marine environment. We note that clauses 81 to 83 would empower the Secretary of State in England, the Welsh Ministers and the relevant government department in Northern Ireland (respectively) to amend or modify any legislation for the purpose of: (i) making provision about the substances to be taken into account in assessing the chemical status of surface or ground water, and (ii) specifying standards in relation to those substances, or chemical status of the water (the existing powers to update those provisions (contained in section 2(2) of the European Communities Act 1972) will be revoked at the end of the transition period). However, we consider that there is no good reason why these targets should not be set out in the Bill itself rather than devolved to secondary legislation.

Challenge 1: Changes to water levels and flows

5 What can be done to address the challenge of changing water levels and flows?

Please input your response in the box below :

Our activities have seriously impacted the ability of the natural environment to accommodate changing water levels and flows. The increased likelihood of extreme weather conditions, droughts, floods and coastal erosion as a result of climate change add to an already seriously compromised system with poor resilience. Natural river flows have been seriously compromised through abstraction, the draining of wetlands, constraining river channels etc, reducing their ability to hold water and allow infiltration to ground water including aquifers. Building and land use changes, including the destruction of natural and semi-natural woodland and the physical modification of rivers and their floodplains, further compromise the natural ecosystem, water levels and natural flows. In coastal areas, saltmarsh and seagrass habitats as well as biogenic reefs have been degraded or lost reducing natural forms of coastal protection.

The Agency's policy paper from March 2020 on Meeting our future water needs: a national framework for water resources (<https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources>) is a sensible step in that it requires strategic regional planning and requires water companies to co-operate on a regional basis to ensure that the 700 megalitres per day which currently comes from unsustainable sources is replaced by sustainable water.

The proposal at clause 75 of the Environment Bill that the Minister may direct that water undertakers prepare and publish joint (i.e. regional) proposals is to be welcomed.

We note that the (re)nationalisation of water companies has been proposed by the Labour Party in recent times. UKELA has no settled view on this proposal at this time but would invite the Agency to consider what effect the nationalisation of water companies would have on the country's ability to manage water levels and flows on a national basis.

6 The abstraction plan, referenced in the changes to water levels and flows narrative, explains our current and future approach for managing water abstraction. What else do we need to do to meet the challenges of climate change and growth while balancing the needs of abstractors and the environment?

Please input your response in the box below :

We are broadly in favour of the Environment Agency's abstraction plan. It is, however, a very high-level document.

For instance, the abstraction plan states that it will 'regulate all significant abstractions that have been exempt historically (approximately 5,000) to make sure that they also play a part in protecting the water environment'. This is plainly a huge undertaking. As these abstractions are key (free!) water sources for water undertakers any attempt to reduce the scope of these abstractions will no doubt be resisted by the undertakers.

The experience of the public inquiry into changes to the abstraction licence for the rivers Test, Itchen and Candover showed that such contested inquiries can be lengthy and costly for participants to engage in given the highly technical nature of the evidence. However, it is not clear if there is any alternative approach available which will permit greater public participation.

The Environment Bill, when adopted, will create the ability to remove or change environmentally damaging licences without the need to pay compensation. This power is extremely welcome but with changes affecting only licences modified after 2028. Action will likely be required sooner than this and in the absence of any amendment to the Bill, voluntary measures akin to the Water Industry's 'Abstraction Incentive Mechanism' should be considered.

7 What kind of a water flow environment do we want? Should we maintain statutory minimum water flow and level standards universally across England as we do now, or go further in some places based on environmental risk?

Please input your response in the box below :

We perceive the maintenance of minimum standards as essential in the interests of the preservation of biodiversity. The Environment Agency has a qualified statutory duty (s. 6(1)(b) of the Environment Act 1995, see also s.7(1)(a)) to promote the conservation of flora and fauna which are dependent on an aquatic environment and maintenance of flow is fundamental to this end. It is unclear to us what is meant by the words "go further in some places based on environmental risk" i.e. does that mean imposing in some places more stringent standards (as the words "go further" might suggest) or more relaxed standards (as the words "environmental risk" might suggest)?

Challenge 2: Chemicals in the water environment

8 What can be done to address the challenge of chemicals in the water environment?

Please input your response in the box below :

Chemicals in the aquatic system can be derived from a variety of sources, e.g. production plants, medical establishments, farming practices and the domestic sewerage system. There is the potential for some of these chemicals to bioaccumulate and effect human health via the food chain. Regulating, mitigating or removing the presence of chemical or, indeed, any pollutants in the water environment should be of the highest priority for the Environment Agency.

We are particularly concerned at the risks posed by substances known to be endocrine disruptors, which include persistent organic pollutants that should have been eliminated through our commitments under the Stockholm Convention. These chemicals can have significant impacts on the hormone system effecting both the immune system and reproduction in a wide variety of species and (more selfishly) for the risk that they will have upon humans. We believe that this is a clear example for the rigorous application of the fundamental precautionary principle.

As with other environmental issues, end-of-pipe solutions are often utilised because improvement is relatively easy to measure. However, understanding the sources of chemicals and where they enter the water environment would enable more focused and effective risk-based solutions to be developed.

It also seems to us that some of the problem arises from the very lax control of inputs to the domestic sewerage system and the absence of any real specific information and guidance to the public on the limits of acceptable use of the system as a method of waste disposal. The exhortations of most water companies to their customers to limit the use to human waste and toilet tissue are really directed towards the prevention of costly blockages to their infrastructure and do not explain or educate about the wider consequences of disposal of other substances. We suspect there is a wide, misplaced belief on the part of the general public that the treatment processes at sewage treatment works are an almost magical means of reconversion of the extremely complex cocktail of sewage to pure water. This is, of course, untrue. It is even further from the truth in the case of CSOs, which by their very nature deliver the original cocktail into receiving watercourses completely chemically unchanged and benefitting at most from crude physical screening and an inadequate degree of dilution. The sewerage undertakers are perhaps unlikely to be enthusiastic to explain these limitations of their systems of their own accord and therefore it falls to others (including the Environment Agency) to provide the public with this vital information coupled with exhortations to be responsible in their use of the system for reasons much wider than giving the undertakers an easier task at the treatment works.

This system is in stark contrast to the controls exercised over trade effluent discharges by the sewerage undertakers themselves using their powers under Chapter III of Part IV of the Water Industry Act 1991. When "the boot is on the other foot" (i.e. where the undertakers are regulating inputs rather than on the receiving end of regulation about their outputs) the undertakers apply and stringently enforce very prescriptive controls on acceptable inputs. We appreciate that this is much easier because such controls are imposed on a discharge-by-discharge basis whereas undertakers are obliged to accept and treat anything which does in fact enter their sewers from a myriad of domestic users. Hence our suggestion that the most promising approach is that of public information and education rather than any attempt at stricter regulation of inputs.

9 Do you support the Environment Agency's proposed strategic approach to managing chemicals as referenced in the Chemicals in the Water Environment challenge document? If not, what changes would you make?

Please input your response in the box below :

We agree with the proposed approach set out in the Chemicals in the Water Environment challenge document.

10 What balance do you think is needed between current chemical use, investing in end-of-pipe wastewater treatment options and modifying consumer use and behaviour?

Please input your response in the box below :

See our answer to 8 above. We do not believe that there is much realistic prospect of significant reduction in current chemical use by either domestic users or industry, although there is a place for wider provision of information and education. Whilst the Environment Agency most certainly has powers to drive investment in end-of-pipe wastewater treatment, the evidence of the experience of the AMP3 process is that sewerage undertakers are inherently resistant to such measures and able to rely with success on the argument that nothing in their regulation should render them unable lawfully to dispose of the content of their sewers at reasonable cost. We therefore consider that modifying consumer use and behaviour is likely to prove more productive, particularly if focussed upon imparting to domestic users the real problems created by the disposal of many household liquids into the sewerage system with complete disregard to their contents. Present understanding is probably limited to a recognition that solids such as disposable nappies and wipes cause physical blockages, but the consequences of pouring, say, waste liquid weedkillers or tins of paint into the system are seldom if ever alluded to in advertising campaigns. It is inherently and obviously better to prevent injurious inputs than to seek to remove them at the far end. Education through social media can give this some impetus.

Challenge 3: Invasive non-native species

11 What can be done to address invasive non-native species?

Please input your response in the box below :

Climate change leads to changes in species distributions and abundance as the environment changes. Non-native species will expand their ranges into areas where native species are retreating. Some of these non-native species can become invasive. Clear understanding and communication of the level of risk/benefit from each species is needed, and action prioritised and enforced accordingly. We cannot resist or prevent these natural changes in species distribution as a result of climate change.

It is important that policies on invasive non-native species are sufficiently flexible to recognise their economic value (e.g. Pacific oyster) to the UK economy and the contribution they can make to sustainable food production.

The Environment Agency needs to work with garden centres and gardening clubs and allotment groups to ensure that these are not brought or sold. Education is needed but a ban/ better bio security would be more useful. Social media could be used to get the message across. Additionally, studies into how they get into the environment would be useful, for example, through research and then education based on the results.

12 How would you promote Check, Clean, Dry to all recreational users of water, including those who are not in clubs or attend events?

Please input your response in the box below :

There are many informal social media groups for example for windsurfing/ canoeing / SUP on facebook. Clear imagery and advice can rapidly be shared through these groups.

13 Are there any barriers stopping you adopting good biosecurity when you are in or near water?

Please input your response in the box below :

A lack of knowledge about what it is and why it is needed is the problem, helpful simple and clear advice that can easily be shared on social media sites is what is needed.

Challenge 4: Physical modifications

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

Please input your response in the box below :

No comment

15 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?

Please input your response in the box below :

Devising robust planning policies which address this issue is necessary. This must be accompanied by educating the public about why things are being done/not done with robust long term evidence.

Challenge 5: Plastics pollution

16 What can be done to address plastics pollution in the water environment?

Please input your response in the box below :

See our answer to 8 above. The most effective solution for addressing the issue of plastic pollution in the water environment would be to remove it at source. Public information and education in this respect is essential.

There is, so far as we are aware, at present no capture at all of micro-plastics as they pass through sewage treatment save as happens incidentally and accidentally from processes aimed at different ends. There is little public understanding of how this source of pollution is contributed to by such things as domestic washing of clothes and the availability of washing machine filters which can help to reduce it.

We are aware that processes do exist for the capture and removal of microplastics at treatment works and given the diffuse nature of the inputs this is an instance where it may be easier and more efficient (and irreducibly necessary) to address matters at the output stage. Absent this, there is bound to continue to be a wholesale distribution of microplastic particles into both the aqueous environment and the agricultural environment (via the spreading of sewage sludge) accumulating in the human food chain.

17 What actions should the Environment Agency take to reduce plastic pollution?

Please input your response in the box below :

See our answers to 8 and 16 above. We consider that the Environment Agency can both inform the public in a more comprehensive manner about the problems from casual introduction of microplastics into the sewage system and begin the planning and consultation processes necessary to begin the undoubtedly long, arduous and controversial task of the introduction of controls on the discharge of microplastics in the final effluent from sewage treatment works.

As for larger plastic items, we think that the public has generally become well-informed of the problems, particularly by recent TV coverage. Further, the sewerage undertakers do have a direct incentive to discourage the introduction of such items into the system and do actively discourage it by publicity about the cost of

removal of the resulting fatbergs etc. We hope that this will achieve a reduction in inputs of such materials as well as the casual discarding of plastic bottles etc. into watercourses and the sea. This could be supplemented by supporting innovative ideas such as recycled body boards and educating the public through social media campaigns and other partners such as pressure groups and local authorities involved in initiatives such as beach cleans.

A perhaps Utopian step would be the introduction of more local screening and filtering within sewerage systems – if each street in the country had a filter at the end of its local sewer pipe to capture such material, with the risk of blockage from gross misuse, local self-regulation might become an efficient means of control. As it is, the consequences appear at locations far distant from the source of introduction.

Challenge 6: Pollution from abandoned mines

18 What can be done to address pollution from abandoned mines?

Please input your response in the box below :

It is surprising that this is still an issue given that concerns about pollution from abandoned mines have been a concern for so long. As this is an international problem the Agency should work with and stay up to date with solutions that are being developed abroad.

Challenge 7: Pollution from agriculture and rural areas

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

Please input your response in the box below :

This is a large and much-debated question to which we can provide nothing fresh and certainly no glib or easy answers. It also provides a refuge for sewerage undertakers, who can often blame deterioration in water quality upon these sources rather than their own, assertions which can be difficult or expensive to refute. Nature based solutions, such as the restoration of wetland and coastal habitats, can help manage this issue. The ecosystem service, goods and benefits that we derive from the natural environment need to become key drivers in decision making so that the Government's ambitions to deliver on biodiversity, water supply and quality, and natural capital net gain are met.

The farming industry have an instrumental role in ensuring future food security for the nation. However, the uncertainty with regard to the shape and timescale for implementation of the Environment and Agriculture Bills, and the introduction of ELMS legislation affects the ability of farm businesses to engage with water improvement works to reduce pollution, particularly in relation to nitrates. Working with farmers to identify means of reducing reliance upon chemical fertilisation whilst continuing to satisfy human appetite is required, since the diffuse nature of this source of pollution means that there is simply no prospect of capturing it once introduced. Once this pollution reaches the estuarine and coastal environments, it can result in harmful algal blooms, negatively affecting biodiversity and the fishing and aquaculture industries; which are also important for the nation's food security.

20 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?

Please input your response in the box below :

See our answer to 19 above.

Challenge 8: Pollution from towns, cities and transport

21 What can be done to address pollution from towns, cities and transport?

Please input your response in the box below :

The planning system must require SUDS for all new development (and SUDS should be retrofitted where possible). Planning policies which require sustainable road design, which discourage the concreting over of drives and gardens and continued focus on discouraging development on flood plains must be implemented.

Most significantly, there must be an expectation that water companies will improve water quality in our rivers, wetlands and coastal environments. There needs to be further, and significant, investment in the sewerage system and treatments works to ensure that overflows from combined sewers into rivers and watercourses are reduced in quantity and frequency until they are truly exceptional.

22 How can sustainable drainage systems and green infrastructure be most effectively used to tackle pollution from urban areas? What challenges are there to using them?

Please input your response in the box below :

The obvious answer is by their increased provision, driven by regulation and intervention in the planning process. Nature based solutions, passive treatment systems and SUDS can raise challenges around long-term maintenance and ownership and, sometimes a perceived concern around cost-benefit. We have no great insight into their limitations in practice, but where issues have been identified, lessons must be learned to improve future application.

Challenge 9: Pollution from water industry wastewater

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

Please input your response in the box below :

It has been reported that there were more than 200,000 occasions last year when untreated sewage was discharged from Combined Sewer Overflows in 2019

(Guardian, 1 July 2020 - <https://www.theguardian.com/environment/2020/jul/01/water-firms-raw-sewage-england-rivers>). Such discharges have significant negative impacts downstream through, for example, loss of biodiversity, poor bathing water quality, the development of harmful algal blooms and the closure of shellfish beds due to contamination that may lead to public health issues.

This is obviously and clearly inadequate and lamentable. It represents a partial failure of the AMP3 clean-up of unsatisfactory intermittent discharges. A further round of improvement is certainly needed. It is depressing to realise that young people must simply take it for granted that urban watercourses are brown in colour, as if this is the result of some natural turbidity or anything other than the presence of untreated sewage discharges, principally from CSOs. Some still discharge in dry weather, others at the slightest amount of rainfall and such discharges represent a significant diminution in the treatment demands imposed upon undertakers, at great savings of cost.

Every outfall should be the subject of a specific and bespoke consent or, in the absence of such a consent a strict series of conditions should be imposed on all outfalls which specify the circumstances in which CSOs can discharge. Most importantly, all conditions on CSOs should specify the exact circumstances in which 'situations such as unusually heavy rainfall' (as specified in the Urban Wastewater Treatment Directive) apply with reference to exactly how much rain and over what period amounts to such exceptional circumstances that water companies should be permitted to discharge. Currently the Water Companies are only required to record when CSOs are operating. They should be required to record the volume of discharge too, so that investment in the most polluting CSOs can be prioritised in order to improve water quality. A future where it is not possible or acceptable for raw sewerage to be released into water courses, estuaries or coastal environments should be an achievable ambition.

It is accepted that this will result in significant capital costs and the onus must be on the water industry to work out a financial structure in which the required infrastructure works can be completed.

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

Please input your response in the box below :

See answer to question 5. There must be significantly more co-operation between the various regional water companies, with other industry sectors (e.g. Local Authorities in relation to planning and the implementation of SUDS, the farming industry in relation to nutrient and other inputs, and the aquaculture industry where water quality is a business-critical issue) and with wider society. The regulator, water companies and local authorities must strengthen their co-operation with interest groups such as Surfers Against Sewage and other, local, environmental groups.

Catchment partnership working

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

Please input your response in the box below :

Given that social media is a key way for large sections of society to communicate and be educated, there needs to be more use of social media in communication and education strategies. Online talks/debates, conferences/ seminars, blogs etc will raise the profile of the Agency's work in this area and may help to get younger people involved.

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

Please input your response in the box below :

No comment

Who pays?

27 How should the step change in protecting and improving the water environment be funded and who should pay? Are there any barriers to doing this?

Enter the response in the box below:

There needs to be a long-term commitment from Government to provide public funds and facilitation to ensure that there is a step change in protecting and improving the water environment; enabling the UK to meet its international commitments and national ambitions.

The profits which Ofwat permits water companies to make are arguably excessive. We suggest that Ofwat should reduce the allowable level of profits which water companies are permitted to make unless it is accompanied by real and sustained progress towards improved water quality, leakage reduction, a reduction in pollution incidents and inter-regional bulk transfers of water.

Ofwat and the Environment Agency should explore developing a water future fund that can be used to develop innovation and education funded by the water companies and other stakeholders.

Supporting information

Complete and submit consultation

28 When we come to analyse the results of this consultation, it would help us to know if you are responding as an individual or on behalf of an organisation or group. Please select from the following options:

Responding on behalf of an organisation (Please specify which organisation or group and include what type it is, e.g. business, environmental group, etc)

Name of organisation or group, if you don't want to leave the organisation name, please tell us what type it is.:

RESPONSE BY UKELA (UK ENVIRONMENTAL LAW ASSOCIATION) TO The River basin planning: Challenges and Choices consultation UKELA (UK Environmental Law Association) comprises approximately 1,400 academics, barristers, solicitors and consultants, in both the public and private sectors, involved in the practice, study and formulation of environmental law. Its primary purpose is to make better law for the environment. UKELA prepares advice to government with the help of its specialist working parties, covering a range of environmental law topics. This response has been prepared primarily by the Water Working Party but with input from the Nature Conservation Working Party. These submissions do not necessarily and are not intended to represent the views and opinions of all UKELA members but have been drawn together from a range of its members.

If other, please specify:

29 What is your email address?

Email:

nicholas.ostrowski@6pumpcourt.co.uk

30 What is your name?

If you are happy for us to contact you about your response please leave your name below. We will not publish your name and will only contact you for clarifications about your response or to follow up on any suggestions you have made. :

Nicholas Ostrowski (on behalf of UKELA)

31 Please select which river basin district your response to this consultation applies to (you can select more than one or submit a national response by selecting 'England').

England (all river basin districts)

32 Are you happy for us to publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

Yes

If not, please let us know why.:

33 Finally, it would really help us if you let us know where you found out about this consultation.

Through engagement with Environment Agency

Where did you hear about the consultation - other: