

# THE NORTH DEVON CATCHMENT PARTNERSHIP'S WATER CHALLENGES AND CHOICES CONSULTATION RESPONSE

TO INFORM  
THE ENVIRONMENT AGENCY'S RIVER BASIN MANAGEMENT PLAN  
FOR CATCHMENT 48 – NORTH DEVON

# 1. Background

## 1.1 North Devon Catchment Partnership

The aim of the North Devon Catchment Partnership (NDCP) is to bring together a wide range of stakeholders to secure better outcomes for the environment throughout the North Devon group of river catchments. It is a Working Group operating under the auspices of the North Devon UNESCO World Biosphere Reserve Partnership.

North Devon Biosphere Catchment Group covers the hydrological catchments of the Taw, Torridge, North Devon & Exmoor Streams and Hartland Streams river systems. It consists of the following organisations: Devon Wildlife Trust (lead partner), the North Devon UNESCO World Biosphere Reserve, the Environment Agency, Westcountry Rivers Trust, the North Devon Coast AONB and Natural England. We are seeking to broaden involvement in the partnership's work at the moment.

Projects underway in north Devon through the work of NDCP partners include:

- Culm Grassland Natural Flood Management Project
- Woods 4 Water
- Torridge River Restoration Project
- Devon and Cornwall Soils Alliance

## 1.2 How this consultation response was constructed

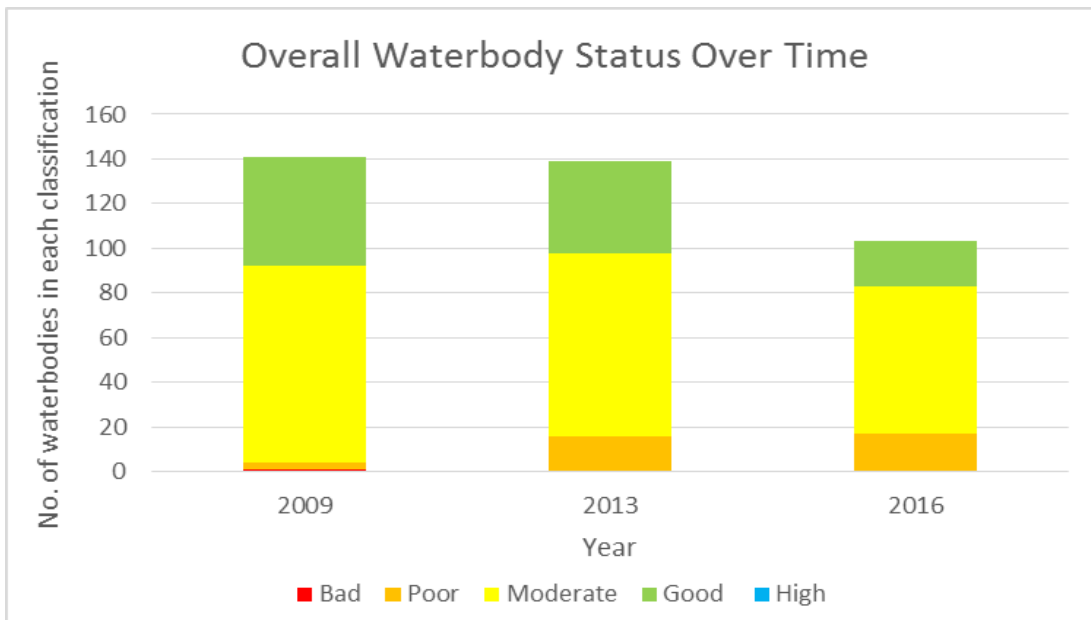
This document is the North Devon Catchment Partnership's response to the Environment Agency's Challenges and Choices consultation. It reflects the feedback from workshop sessions held by the Catchment Partnership at a one day meeting in Merton, Devon, on 4.2.20, and it records the views of the stakeholders attending. It therefore represents a collation of broad stakeholder input to the consultation, co-ordinated by the Catchment Partnership. **Please note that it does not necessarily reflect the agreed policy lines or views of the organisations on the Catchment Partnership.**

Stakeholders have also been encouraged to send in their own personal response to the consultation; however, we have no way of knowing how many responses will result from this.

North Devon Catchment Partnership would like the Environment Agency to take note of the comments and views reflected in this document, and the severity of the concerns raised.

## 1.3 The current state of North Devon's rivers

Data from Environment Agency: over the lifetime of the Water Framework Directive so far, the number of water bodies in North Devon that have achieved good ecological status has declined. This has partly been due to a refinement of the data. A summary of the current and past status of North Devon's waterbodies is shown below. In 2016, only 19% of these were in good ecological status, 64% in moderate, and 17% in poor status. We note from the recent release of the 2019 data that the situation has recently declined even further.



Year	Bad	Poor	Moderate	Good	High	TOTAL
2009	1	3	88	49	0	141
2013	0	16	82	41	0	139
2016	0	17	66	20	0	103

### Number of water bodies in different WFD classifications in north Devon

North Devon has highly agricultural catchments where 73 of 103 (70%) of waterbodies and 711km of river were impacted by agriculture and rural land management as a category in cycle 2. 59% of waterbodies and 644 km of river were impacted by the water industry in cycle 2. 89/103 (79%) of waterbodies in north Devon are considered to be 'at risk' from overall invasives pressure; 13/103 (13%) of water bodies are not reaching their ecological targets due to impacts from physical modifications; and only 3/103 (3%) of water bodies have flows as a significant management issue linked to issues in cycle 2.

On flood risk, 8,679 properties are at risk in north Devon. Of these:

5,412 are homes:

- 774 at high risk
- 1,522 at medium risk
- 2,014 at low risk
- 1,102 at very low risk

3,267 are non-residential:

- 14 electricity sub-stations
- 25.5km of railway line
- 19.5km of A roads

There is £41,000,000 of flood risk investment 'need' in north Devon between 2015 and 2033 Government allocation £ 26,000,000, match required £15,000,000.

**North Devon Catchment Partnership is keen that not only is the decline in the quality of North Devon’s rivers halted, but that restoration work and capital investment is undertaken through catchment management and land use practices to improve the ecological status of our rivers and waterbodies at the earliest opportunity. We strongly support the retention of all Water Framework Directive standards and requirements as a legislative minimum for the UK after Brexit.**

**We would also like to see a sustainable approach to flood risk management that attempts to address the increasing flood risk likely through climate change, where possible using natural processes with multiple benefits (such as woodland and wetland) to help communities manage flood risk in the long term.**

## **1.4 North Devon Catchment Partnership Stakeholder Day: 4<sup>th</sup> February, Merton**

Following Environment Agency guidance, a full stakeholder analysis for the catchment was carried out by the NDCP in autumn 2019. This was used to develop an invitation list for the stakeholder day on 4<sup>th</sup> February 2020.

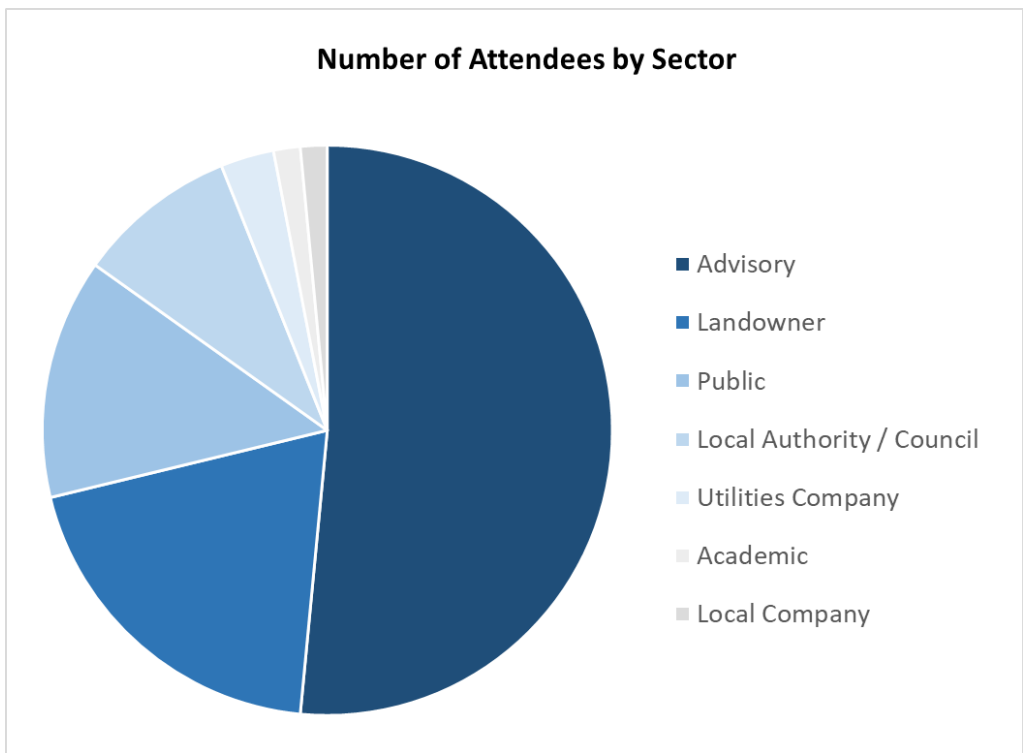
The purpose of this one-day event was to discuss and gather views from all those living and working with the water environment in North Devon. It was an opportunity to share views, concerns and potential solutions to the challenges facing the water environment of north Devon – the rivers Taw, Torridge, North Devon streams and estuaries. We aimed to attract people from across the catchment who wanted to have a say in how our water resources are managed.

A full briefing provided for the day, including the agenda, is attached to this consultation as an appendix.



The event was attended by 66 advisors, landowners, members of the public, local authority and company representatives and academics.

All workshop sessions on the day had good and well-proportioned attendance by sector, with 'Agricultural and Rural Pollution' and 'Climate' the most popular. Please see below a chart which provides an overview of the number of attendees by sector. The advisory sector was very well represented, which would have all drawn evidence from local landowners within the catchment and wider associated catchment-based issues. The second most populated sector was landowners which enabled a highly valuable insight into the management of North Devon's farmland (80% of total land use in north Devon is agriculture).



## 2. Overview of NDCP Stakeholder Day : common themes

The following themes recurred throughout the day across a number of different workshops tackling different Challenges and Choices topics.

- **More and effective enforcement is needed** within our legal and regulatory systems, on key issues such as pollution where there are major failures for waterbodies. This is important for diffuse and chronic problems caused by many incidences or land holdings.
- **Farmers require comprehensive and well funded advice and support**, and the funding required to make positive changes for the water environment where investment is required.
- **Cultural change is needed across all sectors** to enable changes in behaviour and evidence for their acceptability by those who make a living from land and water
- **Public information and education is required** to highlight the poor quality of much of our water environment, and the changes that they can make to contribute to its improvement.

### 3. Challenges and Choices: detailed responses to the consultation

The following responses are a reflection of the outcomes from each workshop on the NDCP Stakeholder Day on 4<sup>th</sup> February 2020. Certain repeated points at workshops have been summarised and highlighted in **bold**. However, all points are valuable contributions to be considered.

#### Question 1

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

The following are some ideas from our stakeholder meeting on personal actions that could be taken to improve the water environment.

- Form local groups and learn from other catchments.
- Yellow fish scheme – yellow fish painted next to drains which lead directly to the sea without sewage treatment.
- Support the Environment Agency to enforce regulation and have more powers.
- Write to your local MP and/or relevant government department.
- Complete Water Challenges and Choices online consultation.
- Wider community engagement.
- Buy organic/local – reduce carbon miles and support local businesses doing the right thing.
- Share good news locally – peer to peer encouragement.
- Join in the clean-up.
- Take part in the North Devon Biosphere's Pledge For Nature Project.
- Collect and grow tree seeds to encourage natural regeneration.
- Promote Riverfly training (more people needed).
- Get involved in Citizen Science.
- Share resources/people.
- Ask government for more money for research and development.
- Support/influence the National Curriculum.

#### 3.1 Climate and biodiversity crisis

##### Climate

##### Challenges in North Devon:

- Understanding actual impacts that climate change is likely to have, so that we can work out how to react to them:
- Wetter winters and warmer summers
- Longer growing season
- Increased extreme weather events / flooding
- Land management can help to lock up carbon e.g. woodlands, wetlands, permanent grassland

## Question 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?*

- Much more education needed in schools, throughout the curriculum for primary and secondary schools
- **Catchment management** e.g. tree planting and wetland creation at the top of catchments – will these help us as flood management measures?
- **Changing farming practice** - reduce bare soil – underseeding not ploughing
- Funding needed for training for farmers and landowners
- Improve and extend advisory outreach for farmers
- Build appropriate regulation into Agriculture Bill – maintain what we have within EU and improve on it
- Communicate that changing for the environment is a good thing – media and action
- **Biomass as a renewable energy source – concerns that maize is very damaging**, reduces natural capital, and leads to soil loss and pollution. Are there other types of biomass that are more sustainable?
- Public to be vigilant and be aware of actions that are illegal / bad for the climate
- Online carbon tool for farmers – NFU is experimenting with this at the moment – investigate. Could this be worked into ELM?
- Farmers to stop cutting tops of hedges – grow hedge trees as a carbon sink – requires cultural change and legislation
- Farmer schemes need to be compulsory for all farmers, not voluntary, in order to be effective on a landscape scale

## Biodiversity

### Challenges in North Devon:

- Advice and financial incentives for landowners/farmers are largely piecemeal, short-term and restrictive in scope. Little funding from additional or innovative sources has been identified or accessed.
- Landowner/farmer commitment to making space for nature/biodiversity and working with natural processes varies enormously – a small number of landowners/farmers are very committed but the majority are driven by the supply chain and other financial incentives.
- Interested farmers and landowners are often unable to take recommendations and advice forward due to limited time and resources.
- Applying for grants is a long process. Some farmers don't have that time to spare.
- Concern that many landowners/farmers no longer have knowledge about land management and biodiversity.
- Cross-compliance: 97% of issues are dealt with via paperwork, not visits.
- Enforcement for environmental compliance is insufficient.
- The built environment is also an important aspect. For example, the ability for Local Authorities to monitor and address mitigation, compensation and off-setting, as well as Net Gain. Yelland Power Station redevelopment was presented as an example, with bird disturbance already observed by the community at Isley Marsh.
- Poor recognition of the value of Areas of Outstanding Natural Beauty.



### Question 3

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

- **We need advisers for each farm.** There aren't enough farm advisers to meet demand.
- **We need whole-farm, long-term advice and appropriate funding,** currently the funding is too restrictive to only some aspects of farms.
- **Advisers need to have a wider base of knowledge** when visiting farms to be able to signpost people if a particular adviser can't help.
- Manage the risk of applying too many advisory approaches and management practices and not getting the benefit you plan as a result. One farm adviser with a whole-farm approach is best. They can become a friend and trusted.
- Support 'farmers in the know' to visit communities alongside advisers. Knowledge is vital. Networking/sharing knowledge (peer-to-peer) is important and knowledge of land and its potential is still there, with landowners.
- **Make the environmental grant process simpler and easier** for busy farmers.
- Make sure that the farms supply chains are there to support local markets, produce and also involve the whole community.
- **We need better data and knowledge** on North Devon's key stone species such as freshwater pearl mussel, beavers (like those to be reintroduced at Holnicote) and salmonids, to enact accurate interventions to focus our efforts.
- Look more at abundance of certain species, e.g. insects, that support the whole ecosystem.
- Work with Natural Processes. This results in a resilient farm.



**Water Challenges and Choices Consultation 2020 – Agriculture workshop**



#### Question 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?*

- **Bring back biodiversity action plans.**
- **Provide local authorities with biodiversity targets**, they have a huge influence in their areas.
- **Enforcement should be a bigger part of the system.** Some landowners need the stick however cultural pressure may be more effective than enforcement; but we do need the 'stick' where appropriate. People conducting criminal activity should be jumped on heavily if needed. This is not happening at the moment.
- **Projects should be more continuous with longer term funding and resources from government** as current funding doesn't reflect the scale of the issue/biodiversity decline. Where the budget comes from needs further discussion and consideration.
- If targets/baselines were conducted at farm level with individual targets, we could get funding to progress individually. Instead of paying a cross-compliance fine for not meeting targets, you should instead be forced to spend the fine money on environmental improvements for the farm.
- Maintain connection with the local community - compliance implies ownership.
- Engage communities and the consumer to increase knowledge of the issues at hand.
- Bring back Riverfly training and survey to the fore.

### 3.2 Challenge 1: Changes to water levels and flows

#### Challenges in North Devon:

- Aging infrastructure – CSOs
- Managing water flows to infrastructure.
- Managing critical infrastructure.
- Land management
  - Managing runoff and soil loss.
  - Encouraging and engaging farmers and landowners to
    - Not harvest after 1<sup>st</sup> October – legislation.
    - Looking after soils in the field.
    - Farmers working together within a catchment – sharing knowledge and experience.
- Climate change – increased summer rainfall, how to we manage the landscape with this in mind?
- Natural Flood Management – Exmoor – difficult to manage areas.
- Perception of SWW to prop up agricultural bill through abstraction in North Devon, SWW abstract very little.

#### Question 5

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

- Soil tests for farmers for assessing soil structure and identifying appropriate management options for restoration.
- Implications of policy should be examined – alterations to landscapes and water management.

- Government has to be joined up in their way of thinking.
- Legacy of policy – environmental degradation.
- Monetary incentives from government policy and down to local markets.
- Local markets could start to drive changes with communities, buy local e.g. open food network.

### Question 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?*

- Attenuating high flows will help with low flows.
- Tide locking effects on low lying drainage – attenuating flows in uplands.
- Re-wilding should be encouraged.
- Restricting development in flood risk areas.
- Building with SuDS in mind and permeable materials.
- Introduction of beavers – to manage water flows and increase biodiversity value.
- Education through forums – training on impacts to watercourse and biodiversity.

### Question 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?*

- Change in government planning and development policy
  - SuDS should be in law and regulation
  - Who takes on management of interventions?
  - Joining up government policy.
- Using tier 2 of ELMS to identify projects with farmer within a catchment.
  - There are still drivers for intensification of farming, supermarkets and consumers, should they pay?

## 3.3 Challenge 2: Chemicals in the water environment

### Question 8

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

‘For every complex problem there is a solution that is simple, clear and wrong’ – there are many things we don’t know – chemical pollution is complex, and there is a cocktail of pollutants – ecotoxicity, accumulation and magnification.

Locally the following solutions were suggested:

Farms: pesticide management, bio beds, runoff amnesties, disposal. Oils / fuels. Small scale organic certification.

Towns: Identify and misconnect drains to river (yellow fish); sewage treatment works emerging pollutants need addressing

Mining: Historic legacy of ownership and remediation. Current ROMP needs upfront funding

Roads: integrated constructed wetlands to remove heavy metals and fuels / oils

Government: Garden Centre control of sales and advice on pesticides. Ban on pesticides in bread making wheat. Challenge pesticide companies to make low mobile, low toxicity, easy to remove chemicals and tax them if not, to fund the cleanup.

### Question 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?*

See above.

### Question 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?*

See above.

## 3.4 Challenge 3: Invasive non-native species

### Challenges in North Devon:

Key pathways are angling and boating and pathways to and from the United Kingdom:



Top 5 INNS mentioned by attendees:

- Himalayan Balsam
- Giant hogweed
- American skunk cabbage
- American mink
- Asian hornet

Key sites mentioned by attendees:

- Exmoor and Exmoor Non-Native Invasive Species Project
- Warrington Marshes
- IDB sites

Key organisations mentioned:

- GB Non-Native Species Secretariat (GB NNSS)
- Devon Invasive Species Initiative (DISI)
- Devon Biodiversity Record Centre (DBRC)

### **Question 11**

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

- Improve awareness of what INNS are and do and how to prevent their spread.
- Need publications for identification and good web site (update GBNNSS website) and leaflets.
- Encourage recording INNS is critical, to determine what we've got and where; baseline surveys. County has an excellent DBRC. Photos are great for identification.
- Longer term funding for projects and with government support with long term monitoring is important.
- Local Action Groups for INNS need more and should be supported. North Devon Biosphere want INNS pledge to inspire volunteers and engage volunteers.
- Management and control must be strategic and feasible e.g. quantity (whether it is worth tackling) and where e.g. upstream/top of catchment and if a black list species recently introduced.
- Understanding treatment – range, effectiveness and feasibility.
- Biocontrol - support new measures for INNS where there are no known current effective measures.
- Highlight projects focusing on INNS and identify ways of how to support them.
- Updating and getting access to national overview – GBNNSS
- Government funding needs to be increased – EAC report on INNS suggests an increase of threefold!
- Need government inspectorate.
- Tackle the issues at parish level.
- Information needs to reach landowners in a digestible way.
- Work with bee keepers regarding Asian hornet and other target groups.
- Provide education on biodiversity and INNS and understand public perception.
- Biosecurity – range of measures, developing area to be supported and understood.
- Signposting to organisations who can provide help – DISI as part of Devon Local Nature Partnership, and Devon Local Nature Catchment Partnerships.

### **Question 12**

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

- See many comments from question 11.
- Environment Agency promotional material on rod licensing.
- Information on parking tickets.
- Posters at activity centres.
- Through social media / televised.
- Focused approach – different promotional materials for different target audiences. Look at research behind GBNNSS updated Check, Clean, Dry campaign.
- Increase awareness.
- Cost of INNS to be explained to encourage good behaviour.
- Provide suitable infrastructure at key locations – wash down facilities and kit.
- Increased governmental controls through an inspectorate.

### **Question 13**

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

- Lack of awareness of INNS and biosecurity measures. Noted GBNNS updating Be Plant Wise campaign
- Horticulture outlets, aquatic centres/garden centres, still selling INNS plants and no guidelines.
- eBay still selling INNS plants and no guidelines.
- Farmers need to understand the problem – provide educational opportunities.
- Funding for local action groups.
- Coordination and organisation at national to local level. Use Regional Invasive Management Plans.
- Resources more funding for government and local groups and projects.
- Volunteers need support – many are interested and need to harness more.
- IDBs and lack of funding for roadside ditches management.
- Local management to improve knowledge and provide training.
- Strategic approach.
- Documentation.

### 3.5 Challenge 4: Physical modifications

#### Challenges in North Devon:

- Primary type of physical modifications in North Devon: mill weirs.
- Tree management / woody material blocking grates and instream features.
- Building at the estuary edge in Yelland, does not fit with naturally functioning ecosystem and causing disturbance.
- Current building schemes have limited consideration of SuDS/runoff risk and sea level rise.
- Combe Martin :
  - Soakaways – building regulations limitations restrict ability to retrofit.
  - Land availability is limited – need to be able to retrofit, community want to retrofit just not able to do so.
  - Mining adit – to the River UMBER but new housing possible infilled adit?
  - Deep adit – opportunity to redirect water flow to river? Or would it be too large/material built up in river? Is this linked with the CSO problem?
  - Where is the sediment coming from?
  - How far is the river from natural function? What is the risk of re-naturalising?
  - Inherited cast iron pipes across river – pipes have become dams with silt build-up.
  - Breakwater removal? What would happen? Changes in sand and sediment movements. ‘Natural’ North Devon beaches are very dynamic.
- Lower Torridge
  - Surface water outfall below silt ‘self-clearing’, but waters do back up and flood 3 properties.
  - Sediment movements influencing boat movements.
- Instow
  - Sand dune training across the beach to prevent sand on the road.
- Fremington
  - Sediment build up in the middle of the channel.
  - Water displaced?
- Main towns – Bideford and Barnstaple
  - Some modifications here do have a current role/use e.g. flood defence.
- Crow Point/Horsey Island

- becoming an island at spring tides.
- drivers/pressures changing – reflected in approach to manage these changes.

#### **Question 14**

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

- Beavers re-introduction
  - To help to restore a river and local habitat.
  - Not on Upper Torridge as wouldn't help to restore river bed/sediment however yes if achieving the 'right' change e.g. natural flood management.
- Tree Planting
  - Infiltration benefits although recognised long-term benefits e.g. oak
  - Importance of people working together and local communities.
  - Funding schemes? Woods for Water and Pledge For Nature.
  - Reason/benefit of action varies from person to person.
- Short-term vs. long-term
  - Land management decisions are challenging.
  - Woods for Water Project – advisory and grant funding.
  - Conflicting priorities – trees vs. culm e.g. carbon capture. 'right tree in the right place'

#### **Question 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?*

Can only work in partnerships

- Combe Martin – crowdfunding
- Work out the benefits – inform who pays.

Sponsorship

- Tourist tax e.g. Tarka Country – 50p/night = £400 raised
- Pledge for Nature.

Business funding

- Communities getting creative.
- Cut business rates if contributing

### **3.6 Challenge 5: Plastics pollution**

#### **Question 16**

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

- To request that central Government enact legislation requiring both all New Washing Machines sold to be fitted with filters that retain micro plastic "beads" & fibres plus the retro fitting of the same such filters in line on the outflow pipes of older machines, with due haste to prevent/arrest the discharge of such pollution into the wider environment/watercourses / the sea.
- Identify alternative plastic-free options to thermal fleece and bale wrap that are fully recyclable.
- More research and joined up thinking needed to provide incentives for good behaviour, including such materials to be VAT free.
- Engagement with young people/farmers, produce an agreement in North Devon through Young Farmer Club's (similar to Farmwise).

- Money raised from EPR scheme goes to local initiatives e.g. knowledge groups/organisations and charities on the ground to facilitate businesses to do the right thing and provide advice which needs to be properly resourced.
- Innovation to reduce plastic usage within a young population in a climate emergency.
- Produce an environment plan by law with rewards for improvement. A baseline needs to be set on agricultural holdings.
- Roll out widely push deposit return schemes.
- More people on the ground to help businesses audit and work out what they need to do to do the right thing.
- Landowners have a massive part to play in the Stewardship of our land. We have to create opportunities for them to be able to engage and be educated.

### **Question 17**

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

- The Environment Agency's focus needs to be on stopping at source and prosecuting those that unlawfully fly tip and litter before it gets to the beach.
- The Environment Agency could provide opportunity/ a platform for best practice. What are other more sustainably minded farms doing? Could they share their story wider to encourage others to do the same?

### **3.7 Challenge 6: Pollution from abandoned mines**

This topic is less of a concern in north Devon and therefore was not covered in the meeting.

### **3.8 Challenge 7: Pollution from agriculture and rural areas**

#### **Challenges in North Devon:**

- Nutrient and pesticide leaching into the wider environment from agriculture (dairy is a particular problem, but not the only one).
- Soil condition, soil health and compaction is a big problem in North Devon.
- Fly tipping in ditches and streams – expensive to clean up and recycle so being buried.
- Biodigesters – land used for high energy crops with poor management leads to 'muddy' fields and waterway siltation (River Mole).
- Salmon catch – no nets used anymore, used to be 48. Decline is accelerating. Salmon also affected by silt from biodigesters in the Torridge: these would be non-compliant with farming rules.
- Currently landowners don't need to be qualified to keep livestock. No basis for inclusion of environmental effects and wellbeing in their practice, as they are not trained. Outreach advice and education for farmers is an issue.
- Farmers are not there to damage the environment however more than 50% of farmers the Environment Agency has spoken to are damaging the environment (EA EOs present) and CSFOs for the area also report high levels of non-compliance with water legislation and regulations.
- Farm advisers could give more positive pointers, eg advising the farmer of cost-cutting measures associated with not spreading slurry.



- There are only 2 EA Environment Officers in the River Torridge area – will there be more? 2 was widely considered by the group to be insufficient

### Question 19

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

- **Effective enforcement of pollution laws**, with prosecutions where necessary – this would act as a disincentive. At the moment, most farmers can get away with bad practice because the enforcement of laws isn't there. This is unfair on those who are keeping to the law. There was a general agreement that the reduction in numbers of EA Environment Officers has been of detriment to the enforcement effort.
- Little mention was made at the meeting of other routes of enforcement such as RPA inspections, although these could have a helpful role to play in increasing enforcement of legal compliance.
- To advise each District Council Planning Department of the North Devon Biosphere's Woods 4 Water Project & its objectives so that any associated Prior Notifications of intended Permitted Developments or Planning Applications can be either Fast Tracked or very promptly processed.
- Correct and appropriate storage of slurry - lagoons required to mitigate point source pollution however soil health and condition need to be more widely considered due to the effects of diffuse pollution.
- **Farm infrastructure/investment** for appropriate management.
- **Tailor farming practices to the soil types**, suitability and location to reduce risky crop drilling, bare soil and soil erosion.
- ELMS
  - local catchment scale based,
  - encourage payments to look after the soils with an accompanying risk assessment for each land parcel for risk to fish, soils, water quality and flood management with certain crops e.g. maize.
  - flexibility needed in the new ELMS scheme with regards to soil type, as the East and West of the country are very different in terms of soils and ground conditions.
- **Encourage funding opportunities** as many landowners cannot get good investments for infrastructure. Lack of money to invest. Some dairy farms aren't struggling because they had a loan to set them up. Others can't even get loans from banks due to having no debt and therefore no record of borrowing. Should instead be able to get a loan with the government with conditions and pay it back.
- Disincentivise wrong doing by prosecutions/fines and taxes on fertilisers and nitrates, however combine taxes with education. Currently sanctions are rarely applied e.g. it is illegal to let cattle in a river, but it does happen, and the farmers don't get sanctioned.
- To refocus energy more locally within our own backyard – pasture fed systems vs. soya supplements from abroad. Carbon footprint effects. A global problem.
- Solutions for fly tipping: cameras, report to authorities for enforcement, crime stoppers, licences, circular economy, increasing awareness/name and shame.

### Question 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?*

#### **Provide education opportunities**

- inclusion in National Curriculum and within agricultural courses.
- Incentivise, promote awareness of laws and regulations. 80-90% of farmers don't know anything about farming rules for water.

- One-2-one education / outreach with qualified farm advisors. National advisory scheme.
- CPD workshops/seminars – payment to attend or pre-requisite to payments and grant condition? Devon Wildlife Trust – at present there is low attendance no matter how farm-focussed the topic is.
- Lack of awareness of potential situations. Farmers are not intentionally damaging the environment. Red Tractor – could include training for a certification and guidance on nutrient plans to raise farmer awareness. Red tractor farms can still be non-compliant. In Ireland it is mandatory to attend workshops to be recognised and compliant. Similar to the test for rat poison purchase, provides an increase in awareness and knowledge, better informed.
- EA soil type brochure required to assess and provide awareness of each holdings local soil conditions and what is suitable for the farm. Farmers are now coming forward for advice – slow but positive.
- Involve the local media.

#### Younger generations

- want to work with the environment, so the right information needs to be there as there is an industry shift and desire to change, so needs government support.
- require funds to support younger generations and Young Farmers Groups through advisor talks at farmers markets as farmers don't have much time.

#### **A call for more EA regulating officers – there are not enough at present**

- with more resources that see the need to give advice on slurry storage and costs of unnecessary spreading before prosecutions however enforcement is needed when landowners do not take up advice.
- officers are currently not widely on the ground so farmers can get away with spreading in NVZ closed periods (Oct – Jan).
- more innovative ways of working needed.

**Change in culture is needed for environment and farming to be combined.** Changing farmers attitude and cultural assumptions of regulators/advisors towards money saving too e.g. ADAS should reinvent and improve as EDAS. Environment Agency can see some changes in farmer attitudes.

**Farm advice:** There should be a national adviser network to aid consistency. Holistic advice required and relationship building between advisor and farmer. However, would peer to peer learning be more beneficial/quicker?

**River monitoring:** Increase volunteering efforts, use in situ sensors and possibly use drone surveys to identify issues and pollution events. Also more people needed to conduct watercourse surveys in places drones cannot reach as to not overlook serious pollution events.

## **3.9 Challenge 8: Pollution from towns, cities and transport**

### **Challenges in North Devon:**

- Growing number of homes
- Aging population – pressure on reliable public transport
- Poor land management transfers polluted surface runoff containing FIO's onto the road network, contributing to the de-designation of bathing waters – e.g. current threat at Combe Martin
- Pollution from roads, traffic, sea washed up
- Commercial activities in towns
- Sewage – disconnected/leaking
- Residential – washing cars

- Public transport is not strong in North Devon producing more cars than we need on the roads.
- Climate change
- How to adapt new towns and cities – rather than adapt the existing

#### Key issues/challenges

- Transport
- Permeable/SuDS – green infrastructure
- Monitoring and enforcement

#### Question 21

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

- Regarding hard surfaces/engineered sites
  - Surface waters – solutions needed to increase permeability to reduce pollution downstream

Re-designing of cities and urban extensions to incorporate flood storage/attenuation.  
Rapid growth of towns and cities increases population around rivers.  
Swales – retrofitting needed.

Transport

  - Growth based on personalised transport.
  - Commuting – unused existing railway, re-instate.
  - Encourage car pools.
  - Release money for environmental improvements from environmental mitigation with development roads.
- House sizes – smaller dwelling footprint, less impermeable runoff risk. Should we be looking at higher housing densities in the inner cities?
- Section 106 – mix of houses.
- Abide by the Code of Sustainable Homes.
- Local Plan – policy is to be carbon neutral.
- New builds should be water management neutral – Sustainable urban drainage.
- Permeable paving – infiltration of pollution not working in attenuation.
- Public spaces exemplar.
- Management of SuDS – water companies should take responsibility.
- Funding Opportunities:
  - Homeowners gets grants to management water drainage and for water management of the home from the government.
  - Perhaps from South West Water – savings.

#### Question 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?*

- Informal flood routes upstream – systems designed to create flood downstream.
- Green spaces are important:
  - Civic responsibility.
  - Re-profile parks i.e. culm grasslands and woodland planting. Example: Cirencester park design – to absorb waters.
  - Rewilding – tree planting – infiltrate at the source.
- Green roofs – on schools and large buildings/industrial estates.

- Learn from Gloucester Services – surface water runoff from car parks, locally controlled, full set of attenuation ponds, amenity value: sit by and watch the ducks.
- Educational drive – engaging and teaching about chemicals.
- Water management – retrofitting grey water, recycling in new homes.
- Living building institute/challenge, BREEAM equivalent which challenges developer with set instructions, building accreditation.
- Developing a system for wildlife at the highest level it can be.
- Change government policy – good enough to approve rather than refuse it.
- Setting standards of new builds:
  - Checking the new houses – needed quality materials.
  - Enforcement and monitoring.
  - Building inspector to look at building itself – other than structure.
  - Planning conditions – needs checking.

### 3.10 Challenge 9: Pollution from water industry wastewater

#### Challenges in North Devon:

- Poor water quality from water industry wastewater is due to a variable combination of factors, including spillages from combined sewer overflows and point source pollution from Wastewater Treatment Works (WwTW); Phosphate (P) in sewage effluent.
- Combined storm overflows (CSO) discharge untreated sewage during heavy rainfall in Combe Martin. Spill frequency is a concern. Seek clarity on what action the EA is taking to address this.
- Improper disposal of domestic waste – blockages and ‘fat bergs’ lead to pollution.
- As South West Water is a 2\* company (according to the Environment Agency’s Environmental Performance Assessment (EPA)) the element of the Axe SAC CSMG investigation relating to a catchment trial could not be supported by the Environment Agency (amendments to the investigation will include additional monitoring in lieu of a trial of catchment measures).
- Waste water infrastructure and growth – the members thought there is insufficient clarity or scrutiny in infrastructure provision aligning with planned growth and building out.

#### Question 23

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

- **RBMP to facilitate an understanding of:**
  - The decision making process around growth (involving SWW, EA, LA, FRAs)
  - National Environment Programme (NEP) investment (e.g. 7 Water Framework Directive improvement schemes in North Devon to reduce phosphates at WwTWs, in order to meet good status).
  - Balance/relationship between hard engineering solutions and catchment-based schemes/measures (links to surface water runoff, infiltration and hydraulic overloading of SWW assets).
  - What is being done on microplastics, e.g. biobeads containment?
  - South West Water’s Drainage and Wastewater Management Plan (DWMP) in managing current and future risks to sewerage capacity and mitigating against any deterioration in overflow performance or sewer flood risk.
- Companies need to maintain permit compliance at WwTWs so the discharges do not harm the environment (risk from ageing infrastructure, climate change and population growth).

How does the development planning process take account of environmental capacity & WwTW headroom?

- Better monitoring is needed on water infrastructure network.
- Provide links to the Environment Agency & South West Water's open data which includes what pollutants/indicators are being monitored and why.
- Raise awareness of South West Water's pollution incidents (Category 1-3), their impact and regulatory response (excl. ongoing criminal investigations).
- **Highlight the Water Industry National Environment Programme (WINEP)** process and the scale and impact of past/planned Asset Management Plan (AMP) investment, including improvement to unsatisfactory CSOs.
- Hot spot analysis / mapping of incidents, with an explanation of how this could affect Water Body status.
- OCS to share Annual Performance Report(s), annual Environmental Performance Assessment (EPA) ratings and/or Ministerial letters with the North Devon Catchment Partnership.
- **Greater transparency of catchment data (pollution incidents) and EA regulatory response is sought.**
- **A call to see more EA Environment Officers (EO's) on the ground regulating** (incl. agricultural incidents).
  - Support a case for additional EO resource, lobby nationally and/or write to MP.
  - Encourage the NDCP to write a letter of support for funding extra resource in the area to do proactive land management visits.
  - Reminder of EA Incident Hotline on 0800 80 70 60.
  - Promote Water Rangers and Citizen Science work – community initiative where volunteers patrol waterways, report leaks and pollutions (Northumbrian Water Ltd example, where rangers were incentivised through reduction in water bills). Could extend to providing sampling kits etc. as in Westcountry Rivers Trust's CSI project.
- ❖ Make Environment Agency position on data and regulation clear e.g. policy on spills from storm overflows, emergency overflows etc. Who does what and when regarding Event Duration Monitoring (EDM).
- ❖ Explain what steps will be taken in the RBMP 3rd cycle to identify and address surface runoff wastewater input from the catchment (CSO & septic tanks, agricultural runoff, misconnections, infiltration).
- ❖ Map the WINEP (2020-25) measures planned in the catchment (monitoring, investigations and improvement schemes) and explain drivers e.g.
  - AMP7 Bathing Water ambition investigations at Combe Martin, Croyde, Ilfracombe Hele and Ilfracombe Wildersmouth (waiting for confirmation of de-designation) - what SWW actions will be needed to improve the classification.
  - AMP7 improvement scheme to optimise CSO operation at Combe Martin (and move spill frequency to 2 per bathing season) also at Ilfracombe Wildersmouth.
- ❖ Highlight the role that SWW's PR19 Business Plan targets and incentives play in improving performance. AMP7 targets include achieving excellent BW status, 4\* EPA, reducing pollution and internal sewer flooding.

#### Question 24

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

- RBMPs to promote social responsibility for what's being flushed away. Incl. microplastics. Highlight 'Love Water', '3 P's' campaigns, supply chain issues.

- Opportunity to collaborate on water efficiency, misconnections, Fat Oil and Grease (FOG) campaigns through catchment partnerships, community group and local engagement events (e.g. Combe Martin), wastewater and flood solution groups etc.
- South West Water could develop a 'social contract'?
- Currently the only avenue is for South West Water to improve its pollutions performance. This will provide the Environment Agency with assurance that the company can be trusted to deliver improvements in other ways. However, the Environment Agency recognises the broader benefits that catchment work brings, and trials will be assessed on a case by case basis.
- Greater clarity on responsibility and reduced risks inherent in the system of South West Water managing headroom in the network and increasing capacity. WFD assessments should be included with more rigor in planning system when allocating sites, i.e. with respect to WFD compliance in the catchment.
- Should be live and open data – on the web?
- Implementing the 'polluter pays' principle we use a fair share approach to apportion contributions of nutrients entering a water body. Catchment Nutrient Balancing (CNB) can be used by one sector to pay others to change behaviours and implement measures to reduce phosphates or nitrates (very careful monitoring needed for such a scheme). For example, a water company could pay farmers to implement buffer strips, create wetland or change farming intensity. However, in order to be eligible for CNB trials, only water companies that have a good compliance record (demonstrated by consistently achieving Industry Leading or Good performance; 3\* or above for a minimum of 3 consecutive years) in the annual EPA are to be considered.

## 4. Catchment Partnership Working

### Question 25

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

- Where can the North Devon Catchment Partnership reach more interested people/landowners?
  - Marketplace stand for quick 15/30-minute advice session.
  - North Devon Show – with group partners to provide whole advice package.
  - Local Parish Councils and the Woman's Institute
  - Young Farmers Clubs
- Continue contact with interested landowners to encourage them to spread good messages.
- Evening talks, suitable locations (relaxed pub environments) using the same PowerPoint slides.
- Printed material – easy for landowners to take the message home with them and remember to contribute.
- Social media – platform for positive change.

### Question 26

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

- Government funded grant schemes.
- More representative funding models.
- Council funding?

- Too many separate bodies confuse the overall and key messages?
- RDPE funds for community work.

## 5. Who Pays?

### Question 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?*

- Include taxes on tourists visiting the area.
- Environmental undertakings applied locally with larger fines
- Proceeds of crime act.
- Government funding to improve farm infrastructure and practice, plus better regulation.
- Post-Brexit modulation money?
- “Green” investment bonds.

