



Link response: Significant Water Management Issues consultation

20th May 2026

This consultation response is on behalf of Wildlife and Countryside Link ([Link](#)), a coalition bringing together 97 organisations to campaign for the natural world.

This response is supported by Angling Trust, Fidra, Freshwater Habitats Trust, Friends of the Earth, Institute of Fisheries Management, Marine Conservation Society, Paddle UK, River Action, River Restoration Centre, The Rivers Trust, The Wildlife Trusts, and ZSL.

Blueprint for Water¹ welcomes the opportunity to respond to this consultation from the Environment Agency on Significant Water Management Issues, as part of the development of the next round of River Basin Management Plans (RBMPs).

Previous rounds of river basin plans have not sufficiently addressed the various pressures and drivers acting upon the water environment, nor have they delivered the necessary change to restore nature. The plans have lacked specificity in terms of the measures and actions included, and have been undermined by implementation and governance challenges. This has been further confused by the many different – often overlapping – plans and responsibilities within the water system. These issues have been raised by the Office for Environmental Protection² and the Independent Water Commission³, and in the legal challenge concerning the Costa Beck.⁴

Through forthcoming water reforms, the Government will introduce a new regional systems planning function. It is essential that this new system addresses the challenges that have undermined the success of RBMPs, to offer a longer-term, integrated and more strategic approach to water management.

¹ [Blueprint for Water](#) is part of [Wildlife and Countryside Link](#), the largest environment and wildlife coalition in England.

² Office for Environmental Protection. (2024). [OEP finds 'deeply concerning' issues with how the laws in place to protect England's rivers, lakes and coastal waters are being put into practice | Office for Environmental Protection](#)

³ Independent Water Commission. (2025). [Independent Water Commission Final Report](#)

⁴ Fish Legal. (2026). [Costa-Beck-History.pdf](#)



To do this, regional systems planners must function and have powers to translate national objectives and priorities for water and the environment into statutory plans and targets at the regional level. This should clarify the action needed across sectors to deliver national targets, including limiting polluting activities and preventing unsustainable permits and consents in line with catchment needs and limits. To deliver this, regional systems planners must also have the powers to coordinate and direct funding, targeting investment where it will deliver the maximum multiple benefits and best value for money. The regional planning function must be properly resourced and staffed, whether – ideally – functioning as independent bodies, or within the new water regulator.⁵

We would be pleased to discuss any of the points in this consultation response further.

Questions

Challenge 1 Climate Change

Question 1: What do you think is most needed to support environmental planners to make informed decisions to deliver measures in the context of climate change?

A combination of open-access data, guidance, training and legislative guidance will be required to support environmental planning to make informed decisions to deliver measures in the context of climate change.

Open-access datasets must be future proofed; not simply latest data based on past observance but based on future projections. The types of datasets needed will include water quantity, discharges, abstractions, soil, and a river network map. Data will be particularly important in underpinning engagement with stakeholders at the catchment and regional levels under a new system of regional planning.

This must be supported by investment into appropriate and relevant research, in particular focused on where there are gaps in knowledge and baselines. Projects such as the CEH work into climate change impacts on habitat restoration and the Earth Observation Platform should be integrated into informed decisions. Through this process, there must be sustained clear engagement with communities, businesses, local authorities and infrastructure providers to ensure that these sectors are fully aware and able to contribute to adaptation and resilience

⁵ WCL. (2026). [WCL Clean Water Now Report 2026.pdf](#)



building measures, including relating to water. This will require support through training and guidance.

In water reforms delivered through new legislation, Government should introduce a specific principal purpose and duty for the new water regulator to exercise its functions to contribute as far as possible to meeting targets set under the Environment Act 2021 and the Climate Change Act 2008. This steer should be passed onto regulated sectors through regulatory actions and decision-making processes.

Challenge 2 Changes to Water Levels and Flows

Question 2: What criteria should we consider when deciding where to prioritise abstraction reductions?

Abstraction reductions should be prioritised in order to protect and restore nature, including ensuring conditions enable keystone species to thrive.⁶ This means prioritising reductions where habitats are particularly vulnerable or sensitive to low water flows – including for example in headwaters, and where data shows that abstraction pressures are currently or will in future (due to projected climate change impacts, population growth, and so on) prevent waterbodies from achieving Good Ecological Status.

Abstraction reduction should also be prioritised in protected sites, such as SSSIs, particularly where data shows that abstraction and low flows are threatening the condition and recovery of the site. This may require going beyond flows that meet Environmental Flow Indicator (EFI) levels. Similarly, abstraction reduction should be prioritised in chalk streams, which are not only ecologically important and globally rare, but also highly vulnerable to over-abstraction. Prioritising these vulnerable yet ecologically critical habitats will bring co-benefits, such as driving progress towards the 30by30 target.

The scope to improve the quantitative status of over-abstracted aquifers should also be considered, due to the benefits this could deliver for groundwater-dependent habitats. Prioritisation should also look at where the greatest ecological gains can be delivered; for example, by considering areas where reductions in abstraction could deliver a significant improvement even if the resultant hydrological regime would still fall short of supporting GES, or by considering where improvements to flow regimes would be co-located with other scheduled improvements, such as structure removal to re-naturalise flow regimes, or

⁶ For example, diadromous endangered species of fish.



wastewater treatment work upgrades to improve water quality. This would see complementary improvements delivered that maximise the value of the investments made.

If local data is available that can provide a more nuanced, accurate picture than WFD assessments, this should be used to determine where the impacts of over-abstraction are most keenly felt, and therefore where reductions should be prioritised.

Abstraction reduction could also be prioritised on the basis of where sectors and land owners/managers have adopted more water saving and storage measures. However, using this criteria would depend on the provision of up-to-date data on water saving and storage actions being taken, for example at catchment level, and an assessment of their efficacy.

Where changes to fully reduce abstraction impacts can only be secured over the long term, this should not be used as a reason to deprioritise investment but rather to highlight the need for interim actions, such as staged reductions, and habitat enhancements that improve the resilience of waterbodies to low flows and drought in the meantime.

Challenge 3 Chemicals in the Water Environment

Question 3: What more could we do to provide you with information and materials to help you understand the challenge posed by the chemicals in the water environment?

It is unclear from the consultation document as to what the intended outcome of providing information and materials to aid understanding is.

For example, if the intention is to improve public understanding of the impacts of chemical pollution in waters and thereby to encourage behavioural change and better choices, merely providing information will not be sufficient.

Government – through its regulators – should provide up-to-date information on the real-world combined effect of different chemicals to improve understanding across sectors and stakeholders. The EA monitors a wide range of chemicals via the prioritisation and early warning system (PEWS). This information must be fully accessible and presented in such a way that it can be interpreted by both expert and non-expert stakeholders. Alongside provision of data, Government and regulators must clearly articulate the outcomes it wishes to achieve, so as to empower individuals, businesses, and so on to take positive action.

Whilst encouraging action in this way is welcome, it **must** remain the responsibility of the regulator to monitor chemical pollution and to enforce standards. The monitoring of chemicals via PEWS should trigger action where harmful chemical contaminants are identified. For



example, emerging chemical threats should be added to the priority substances list and regulatory standards should reflect the latest science on safe levels. In line with the precautionary principle, regulation must anticipate risks and act before scientific certainty is established, including by regulating chemicals on a group basis. Monitoring should also trigger restrictions and other regulatory measures – such as in UK REACH - to control harmful contaminants at source.

Since leaving the EU, the UK has not established an equivalent to the EU’s ‘Watch List’ of substances (which the OEP has highlighted⁷) or matched new additions⁸ to its Priority Substances List or its more stringent water quality standards⁹ for some of the chemicals on the list. As the EA outlines, many of the substances on the UK list are highly regulated, ‘legacy’ chemicals, so that “achieving further reductions will not be easy”. However, there are hundreds of other chemicals found in our fresh and coastal waters, without standards, that are having a detrimental effect on aquatic life. The fact that many of these legacy chemicals continue to exceed regulatory thresholds highlights the importance of taking swift preventative action to control at source persistent substances that continue to cause damage long after they’re banned.

In terms of Chemical Status - noting that this considers only a small proportion of chemicals that could be harming aquatic environments as already outlined above - WFD reporting could nevertheless usefully distinguish between those chemicals which are legacy pollutants and those which are still actively entering the water environment, in order to provide stakeholders with clarity on the potential to take action across these two different categories of pollutants. For example, to allow effective remediation of legacy pollutants and action to ensure that they are not continuing to be released from sources such as historic landfills, and to direct action to reduce currently active sources of new pollutants rather than leaving this for later clean-up.

Question 4: What action do you intend to take, if any, in tackling the challenge posed by chemicals in the water environment (e.g. influencing others, communicating the problem to others, changing your behaviour)? Would this action be community level, or as an individual?

Wildlife and Countryside Link is a national-level policy organisation, working to influence chemicals policy to ensure that this is as effective and ambitious as possible.

⁷ Office for Environmental Protection. (2024). [OEP finds ‘deeply concerning’ issues with how the laws in place to protect England’s rivers, lakes and coastal waters are being put into practice | Office for Environmental Protection](#)

⁸ [Directive - EU - 2026/805 - EN - EUR-Lex](#)

⁹ [Directive - EU - 2026/805 - EN - EUR-Lex](#)



Some Wildlife and Countryside Link member organisations work directly in and with local communities; more could be done to leverage this influence, but potential is currently being limited by funding and capacity constraints.

Much greater public awareness of the issue would help encourage more sustainable use and disposal of chemicals from our homes, gardens and businesses. Fewer than 15% of people know that that unwanted drugs can be returned to a pharmacy rather than being disposed of inappropriately (e.g. by flushing them away). The England-wide Catchment Based Approach partnerships provide a framework to undertake such community engagement, provided they are sufficiently resourced.

However, voluntary action cannot drive the transition to safer chemical alternatives, given the ubiquitousness of uses, low awareness and lack of information on chemical content for most products. Polling commissioned¹⁰ by the Royal Society of Chemistry on PFAS showed that citizens expect the government to keep them safe and make sure that products are not harmful before they are allowed on the market. While better public awareness is always helpful – such as in relation to safe disposal of vital medicines – there are limited benefits from public awareness campaigns in reducing harm from chemicals in the environment.

The consultation identifies public awareness of the risks of bisphenol A (BPA), resulting in changes in producer behaviour. However, the transition was as much driven by regulation¹¹ and the prospect of regulation – from its identification as an SVHC in 2017 (which is used by companies globally for making decisions about chemicals used in their supply chains) to bans on its use in thermal paper and baby’s bottles, as well as EU controls¹² in food contact materials. Critically, BPA has been replaced by other bisphenols that are as harmful – so that¹³ when BPA was banned in thermal paper BPS usage doubled in one year (2016-17), and as BPA levels in people are falling, rising levels of BPS and BPF are now being detected.

Question 5: If there any citizen science initiatives you feel could support this area of work, please provide details

Whilst many Citizen Science water quality methodologies focus on nutrient pollution, it is worth noting that techniques not directly focussed on chemicals can still be of value when considering chemical contamination. For example, Mud Spotter (which identifies points at which fine

¹⁰ [First-ever survey of UK public attitudes to PFAS ‘forever chemicals’](#)

¹¹ [A history of ineffective action on BPA, and the lessons for reform of EU chemical laws](#)

¹² [UK Proposes Ban on BPA and Other Bisphenols in Food Contact Materials | SGS Germany](#)

¹³ [chemtrust-toxicoup-mar-18.pdf](#)



sediment enters watercourses, such as culverts, pipes, ditches and overland flow pathways) and Outfall Safari (which locates polluted surface-water outfalls) both offer methods through which chemical pollution pathways can be identified. Turbidity monitoring (Secchi discs) could then be used to indicate where such inputs are most active, helping to prioritise chemical monitoring by others. This provides a useful example of how Citizen Science initiatives could be used alongside regulatory or academic monitoring to identify pollution hotspots.

Much more can be made of monitoring techniques such as passive samplers¹⁴ to quantify and assess the risk of chemical contamination. Passive samplers can be used to determine time-weighted and/or flow weighted mean concentration of chemical contaminants by adsorption to media in the sampler, followed by lab analysis. This approach has been used to monitor several contaminant types including herbicides¹⁵, pharmaceuticals and industrial chemicals.¹⁶ Greater uptake of these approaches can be enabled through training and providing resources.¹⁷

Environmental NGOs and citizen scientists already play an important role in providing data and evidence locally, for example, concerning road runoff pollution.¹⁸ This collection of evidence beyond that of the resource-constrained regulatory monitoring networks needs to play a more prominent role in the future.

Question 6: What additional action do you think public bodies need to take to regulate or address chemicals in the environment to achieve environmental objectives?

As a priority, chemical pollution must be managed and prevented at source, including through banning harmful chemical groups such as PFAS, and restricting non-essential uses of polluting chemicals. Removing these persistent chemicals via treatment (such as from wastewater) is highly carbon intensive and can be prohibitively expensive. Furthermore, removal from the

¹⁴ [Quantification and risk assessment of polar organic contaminants in two chalk streams in Hampshire, UK using the Chemcatcher passive sampler - PubMed](#)

¹⁵

FarrowL., G.MortonP., A.CassidyR.FloydS.McRobertsW., C.DoodyD.et al (2022). Evaluation of Chemcatcher® passive samplers for pesticide monitoring using high-frequency catchment scale data. *J. Environ. Manag.* 324, 116292. 10.1016/j.jenvman.2022.116292

¹⁶ MoschetM.VermeirssenE. L. M.SingerH.StammC.HollenderJ. (2015). Evaluation of *in-situ* calibration of Chemcatcher passive samplers for 322 micropollutants in agricultural and urban affected rivers. *Water Res.* 71, 306–317. 10.1016/j.watres.2014.12.043

¹⁷ [Frontiers | The potential for freshwater citizen science to engage and empower: a case study of the Rivers Trusts, United Kingdom](#)

¹⁸ [Toxic run-off from roads not monitored, BBC finds - BBC News](#)



environment, if even possible, cannot undo harm already caused to the health of both people and wildlife.

The EU has already proposed a restriction on the use and manufacture of PFAS, and further restrictions and controls on a number of harmful substances including those that pose a risk to the water environment. The UK Government should match these commitments as a minimum regulatory baseline. Indeed, the Independent Water Commission called for legislative changes to deliver more ‘pre-pipe’ solutions to manage pollutants. An early and easy step should be the reclassification of pet parasiticides containing fipronil and imidacloprid as prescription-only, given that their use in outdoor agriculture is already banned.

Government must direct and support public bodies to vastly improve monitoring of chemical pollutants across the whole water environment. This should include at least matching EU action to expand the number of chemicals on the Priority Substances List to include emerging chemicals of concern, alongside more stringent water quality standards for some chemicals such as pesticides, pharmaceuticals, and Trifluoroacetic acid (a breakdown product of certain PFAS). The EU’s action to operate a chemicals ‘watch list’ that is continually updated with new improvements should also be matched.

Greater investment in wastewater treatment is required to remove chemical contaminants from wastewater before they are discharged, including of smaller rural plants that are typically characterised by secondary levels of treatment only. These are not designed to address emerging contaminants, especially as future increases in the frequency and severity of drought will mean longer periods when there is insufficient river flow to adequately dilute such chemical contaminants. Recent updates to the EU’s Urban Wastewater Treatment Directive includes new requirements to monitor and treat a much wider range of chemical pollutants in wastewater, and, notably, a polluter pays mechanism (extended producer responsibility) for recovering these costs. A similar approach should be adopted in the UK.

Further action is also needed to address the harmful impacts from sewage sludge; a byproduct of wastewater treatment, that is sold or given to farmers as a fertiliser. This sludge (also known as biosolids) contains a concentrated cocktail of harmful chemicals, including PFAS, microplastics, flame retardants and pharmaceuticals.¹⁹ Around 87% of biosolids produced in

¹⁹ [The National Chemical Investigations Programme 2020-2022 Volume 12 - Biosolids Report](#)



the UK each year are spread on agricultural land.²⁰ Once applied, they can leach or run off into rivers and groundwaters, harming both terrestrial and aquatic organisms.²¹

Government proposals to revoke the Sludge (Use in Agriculture) Regulations 1989 and to move sludge regulation into the Environmental Permitting Regime are welcome, however this does not go far enough.²² Additional measures are required to phase-out the application of sewage sludge on farmland until quality improvements are achieved, and sludge can be proven safe.²³ Contaminant monitoring must also be strengthened and the permit criteria strengthened to restrict the spreading of sludge containing all harmful substances above thresholds based on best available science. As discussed, this should be supported through stronger upstream source control to prevent harmful chemicals from entering wastewater in the first place, and upgrading wastewater treatment technologies via funding from an Extended Producer Responsibility scheme.

Challenge 4 Invasive Non-Native Species

Question 7: Are there any barriers stopping you adopting good biosecurity when you are in or near water?

Wildlife and Countryside Link is a national coalition organisation working on environmental policy and therefore does not directly work on or near water in the field. However, many of our member organisations do have experience on or near water in the field, and are aware of the following barriers to good biosecurity practice:

- Lack of awareness. Despite the risk that INNS pose to the freshwater environment, public, political and industry awareness of the issue is low compared with other pressures such as pollution. For example, the Independent Water Commission did not include any recommendations to improve INNS management or prevention in their final report.²⁴ Nor did the issue of INNS feature within Government's Water White Paper, 'A New Vision for Water'.²⁵ Recent research across 200 global and British organisations

²⁰ [Should we be putting sewage sludge on land anymore? - CIWEM](#)

²¹ <https://fidra.org.uk/download/james-hutton-institute-re-assessment-of-environmental-risks-from-sewage-sludge/>

²² For full detail, see WCL's response to the 2026 consultation:

[Link response to defra consultation sewage sludge applied to land.pdf](#)

²³ [WCL-sewage-sludge-position Fidra-and-EIA-PDF-July-2024.pdf](#)

²⁴ Independent Water Commission. (2025). [Independent Water Commission Final Report](#)

²⁵ Defra. (2026). [Defra water white paper 2026 \(with correction slip\)](#)



indicates that lack of data and lack of awareness are some of the top barriers preventing companies taking action on INNS.²⁶

- This is exacerbated by a lack of prioritisation from Government, which means that there is also a lack of incentive to act. Government has consistently failed to prioritise the issue of INNS in water; for example, significant delays in establishing and updating Pathway Action Plans for angling and boating, and the lack of funding afforded to INNS compared with other plant and animal health biosecurity regimes. This means that, despite more than 70% of waterbodies in England being at risk of deterioration due to INNS, the issue is framed as of lesser importance compared with other water environment pressures, which is in turn passed on to different stakeholders and sectors – for example, from regulators onto regulated industries. For example, despite having statutory objectives to manage INNS under the WISER, water industry progress on delivering INNS-related work is not currently included in annual performance reviews such as the EPA. This means that accountability for and scrutiny of this work is lacking.
- Insufficient provision of and access to free, quality advice and/or best practice guidance. Disseminating guidance in addition to campaigns such as ‘Check, Clean, Dry’ could form part of the GB Non-Native Species Inspectorate’s role, but it currently lacks sufficient funding and staff capacity in order to do this. Local groups with INNS expertise and experience such as individual River Trusts, Wildlife Trusts, and recreational water user groups such as angling groups and paddling clubs could also provide information and best practice guidance, but again lack of funding and staff capacity are limiting factors that must be addressed. Local scale delivery is essential for effective awareness raising.
- Lack of resource and/or expertise may mean that biosecurity and INNS management takes place on a reactive, ad hoc basis rather than proactively and strategically. Stakeholders operating on or near the water, such as water companies, should have robust biosecurity policies that are enacted consistently, and should ensure staff are sufficiently trained and equipped with INNS knowledge and awareness. Appropriate biosecurity facilities must be available at all sites.

These barriers may work in combination to prevent good biosecurity practice across sectors. For example, research published in March 2026 by Flora & Fauna and the IUCN states that just

²⁶ <https://www.fauna-flora.org/publications/ias-report/>



31% of businesses are regularly assessing their exposure to INNS-related risks, with barriers cited including lack of data, lack of awareness and understanding, and cost.²⁷

Question 8: Do you think that our approach to invasive non-native species is appropriate?

Prevention is by far the most efficient and effective means of managing invasive non-native species (INNS); it is welcome that this, and the need to work at catchment and national scale in partnership, is embedded within the Agency's approach.

Through forthcoming water reforms, Government will introduce a new, dedicated regional planning function with the intention of strengthening delivery, increasing collaboration, and helping to identify where lower-cost and higher-impact solutions to improve water health and build resilience can be utilised. INNS management and prevention must be fully incorporated into this new regional planning function, whether this is taken forward within the design of the new regulator, or as separate regional system planner bodies.

INNS must be afforded greater significance within the Agency's work to improve the water environment going forward. For example, through including delivery of INNS-related obligations within performance reviews such as the EPA, to increase transparency and accountability, and by ensuring that risks are fully considered across potentially high-risk activities, such as water sector bulk water transfers.

Given the risks to WFD status posed by invasive species, INNS appear to receive relatively little attention under the current regime. In exploring setting 'new ambitious targets for the water environment' as stated in the Water White Paper, and in developing River Basin Management Plans containing waterbody-specific Programmes of Measures, Government should take the opportunity to ensure that INNS feature more prominently in both actions and targets.

Question 9: Please share any challenges or good experiences relating to prevention, control, eradication and management:

As discussed, barriers such as lack of awareness, insufficient provision of advice or best practice guidance, and gaps in the data present challenges to the effective prevention, control, management and eradication of INNS. In England, bodies that should hold responsibility for disseminating guidance and best practice – such as the GB Non-Native Species Inspectorate – are not sufficiently funded or resourced to do this properly.

²⁷ Flora & Fauna. (2026). [IAS-Call-to-Action-Report-March-2026.pdf](#)



A further challenge is lack of resource, both in terms of funding and staff capacity. For example, Local Action Groups (LAGs) lack sufficient long-term funding, despite their vital role in managing and eradicating INNS on the ground. One-year funding cycles create uncertainty as to whether projects can continue, leading to the loss of experienced staff and stalling progress.

It is important that previous examples of both successes and failures are fully assessed, and lessons learned incorporated into best practice going forward. For example, the role of the invasive Zebra mussel in the ecological devastation of Lough Neagh, or the successes of partnership working. On the latter, the Waterlife Recovery East project offers an example of how working at catchment scale in partnership has had success in eradicating American Mink in parts of the UK for the first time, and the recent publication by EA and NE of a joint National framework for action towards the eradication of American mink in England, building on this approach, is extremely welcome.

Challenge 5 Physical modifications

Question 10: What duties, powers and responsibilities could present, or future water regulators have to effectively respond to, and deliver measures for, physical modification pressures across rivers, catchments and coasts?

We support the Agency's assertion that addressing physical modifications at scale will require a strategic shift towards mainstreaming nature-led recovery, removing the historical legacy of redundant structures, aligning funding, strengthening regulation, and embedding hydromorphology principles into planning and decision-making. However, it is unclear from the consultation document what the 'opportunities' that the Agency suggests have been created through recent legislative change and regulatory review are, or how these will be taken forward.

In water reforms delivered through forthcoming new legislation, Government should introduce a specific principal purpose and duty for the new water regulator to exercise its functions to meet targets set under the Environment Act 2021 and the Climate Change Act 2008. This should include responding to and delivering measures for addressing physical modification pressures and impacts across the water environment, given that at least 41% of waterbodies are impacted by physical modifications.²⁸ Indeed, this figure is likely an under-estimate; recent mapping by the River Restoration Centre using modelled data and River Habitat Surveys shows that in England and Wales, more than 60% of the river network has poor or very poor habitat quality. This will be relevant across a variety of EA functions and funding streams, not just WFD

²⁸ Defra. (2025). [State of the water environment indicator B3: supporting evidence - GOV.UK](#)



delivery – for example, through FCERM funding, and through regulation of the water sector, both of which should include consideration of removing redundant structures, and minimising the impact of any new infrastructure.

Water reform could also deliver new requirements for regulators to have greater regard to the resilience of the water environment, thereby driving actions to address physical modification pressures to build that resilience and to make space for waterbodies and watercourses to naturalise; for example, river ‘rewiggling’, floodplain reconnection, and restoring connected networks of wildlife-rich river corridors and buffers.

Requirements could also be set via new targets in legislation for nature restoration and connectivity, following the example set by the EU in the ‘EU Nature Restoration regulations (NRR 2024/1991)’. This could apply to both addressing barriers within the river, and the riparian zone. The Nature Restoration Regulation (NRR) sets a target for 25,000km of free flowing rivers by 2030, and requires EU member states to identify and remove obsolete barriers such as dams and weirs to restore natural river connectivity and ecosystem health.²⁹ The new European Committee for Standardisation (CEN)³⁰ and British Standards Institute³¹ standard for Strategic River Restoration Planning offers an internationally adopted set of principles on restoring natural river processes to address physical modification.

Habitat restoration and creation measures to tackle physical modification challenges could also be driven through providing new incentives and support for land owners and managers, for example under ELM schemes.³² At the strategic level, the Land Use Framework also offers new opportunities for addressing physical modification pressures at scale; Government has recognised landscapes for water and nature recovery within its vision for land use in 2030 and 2050.

In addition to duties and powers for the water regulator(s), River Basin Management Plans must include specific, costed, time-bound measures to address physical modification pressures where these are present across catchments and are preventing waterbodies from achieving at least ‘good’ status. This will help to address barriers to successful delivery and implementation,

²⁹ <https://damremoval.eu/nature-restoration-law-enters-into-force-whats-next-for-free-flowing-rivers/> & <https://www.ecrr.org/Publications/id/1260>

³⁰

https://standards.cencenelec.eu/ords/f?p=CEN:110:::FSP_PROJECT,FSP_ORG_ID:78134,6211&cs=1C0633CB138CFAB3AD25D9FE8BFDE0BFD

³¹ <https://knowledge.bsigroup.com/products/water-quality-guidance-standard-on-a-strategic-approach-to-river-restoration>

³² Making Space for Water. (2025). [The Briefing \(England\) — Making Space for Water](#)



as identified by the OEP³³, and as highlighted through the Costa Beck case. For example, there is currently no formal planning for river restoration or for improving habitats or hydromorphology. River restoration and habitat management plans must be formalised and integrated within the RBMP process, requiring formal reporting on hydromorphology rather than restricting this to a supporting element.³⁴

Question 11: How might these duties, powers and responsibilities evolve to support delivery of measures to deliver water body environmental objectives and wider nature recovery, climate resilience and sustainable development?

Duties, powers and responsibilities to address physical modification pressures – and indeed any pressures acting upon the water environment - must be implemented through long-term plans with clear, time-bound, and fully costed measures that set out how the pressures will be addressed and the target of achieving ‘good’ status achieved. Clear milestones or ‘interim’ targets must also be set, to avoid efforts being backloaded and to allow progress to be monitored such that issues can be identified and proactively addressed. This is borne out in a recent study by European Centre for River Restoration (ECRR) looking at national policies across 10 countries.³⁵

As has been established by the OEP, and in the recent Costa Beck case, River Basin Management Plans do not yet do this effectively. This is also recognised by the European Commission, with the Nature Restoration Regulation requiring National Restoration Plans to be published for each EU Member State.³⁶

Government has indicated that forthcoming water reforms will introduce a stronger regional planning function to the water system, whether through the new water regulator or as independent regional planning bodies. This regional planning function must operate to translate duties, powers and responsibilities, and national level objectives, into specific targets and plans for achieving them at the regional and catchment level. This regional planning function must be statutory, and have the power to direct action and funds across sectors in pursuit of the most efficient and effective measures, aligning funding and planning for delivery.

³³ OEP. (2024). [OEP finds ‘deeply concerning’ issues with how the laws in place to protect England’s rivers, lakes and coastal waters are being put into practice | Office for Environmental Protection](#)

³⁴ Robins et al., 2024, A new framework for river restoration planning at catchment scale in the UK, River Research and Applications.

³⁵ <https://www.ecrr.org/Portals/27/Publications/Full-report-A-European-national-river-continuity-restoration-policies-review-1.pdf>

³⁶ <https://damremoval.eu/nature-restoration-law-enters-into-force-whats-next-for-free-flowing-rivers/> & https://project-merlin.eu/files/merlin/downloads/policy_briefs/MERLIN_Synergies_and_Tensions.pdf



This must be further supported through increased funding and a stronger mandate for the Catchment Based Approach (CaBA), to facilitate delivery. Whilst the recent uptick in funding for CaBA partnerships is welcome, this will not be sufficient given the scale of need.

Furthermore, Government must ensure that there is adequate funding and resourcing for the water regulator(s) to deliver duties, powers and responsibilities robustly and comprehensively.

Question 12: How should success in addressing physical modification pressures be defined and measured in environmental, social, and economic terms?

Environmentally, success will mean waterbodies recover from the impacts of physical modifications, and fewer Reasons for Not Achieving Good Status (RNAGs) are attributed to physical modification. Physical modification is recognised as supporting, and underpinning, river health; improvement in biological quality elements to achieve GES rely on good physical habitat. Simple measures like the length of channel opened up for fish migration could be used to communicate progress; however, whilst such metrics are informative, they do not capture the full range of benefits delivered by tackling physical modifications. Considering the importance of physical condition in determining biological condition, this could be assessed separately using a 5-point scale – as for other WFD quality indicators – so that it can be properly monitored and reported on.

Addressing physical modification pressures should mean an increased number of waterbodies achieving Good or High Ecological Status. The abundance and health of aquatic and semi-aquatic species should increase, and the quality and condition of habitats should improve. For example, protected sites impacted by physical modification progressing into recovery and/or favourable condition. Ultimately, success will mean the achievement of targets for water health; including under WFD Regulations, and the Environment Act 2021.

Socially, success could be measured in terms of access to and awareness of more healthy, resilient and semi-natural water environments such as rivers and river corridors.

Economically, addressing physical modification will bring natural capital benefits that can be measured and assessed, such as through a Common Values Framework. Direct economic cost benefits should also be measured; for example, reduced costs associated with flooding and flood risk due to the natural flood management (NFM) benefits from restoring the natural functioning of rivers and floodplains and the resilience of the water landscape increasing.



Challenge 6 Pollution from agriculture and rural sector

Question 13: How effective do you think current government policies, such as agri environment schemes (e.g. payments for environmental land management), or targeted habitat restoration, are in improving water quality?

WFD and River Basin Management Planning data makes it clear that agricultural and rural pollution remains one of the most prevalent pressures acting upon the water environment; 45% of waterbodies are impacted by the agricultural sector, with 40% impacted by rural pollution specifically.³⁷ However, whilst examples and case studies show that individual schemes and actions have delivered benefits for water quality, it is not clear how these individual actions collectively add up towards national targets and goals, because funding and capacity gaps mean that full WFD datasets have been reduced to a 6-yearly reporting cycle, limiting potential for stakeholders to assess progress made.

As such, it is very difficult for environmental stakeholders such as Blueprint for Water to understand how effective Government's existing agricultural schemes and policies have been in improving water quality.

To ensure that policies such as agri-environment schemes can deliver maximum benefit, the following is required:

- A clearer, strategic plan for the whole water system, setting out the direction of travel – under an 'apex' water target – and establishing delivery pathways setting out how objectives will be met. As discussed in response to Q.11, this should be supported through a new, strong regional planning function with powers to develop statutory plans and direct funding. Such a planning function could help better spatially target and prioritise where different agri-environment schemes will have the greatest benefit for the water environment.
- A sufficient budget for ELM and nature-friendly farming. Defra has committed to spending £2 billion a year on ELM until 2029, over £1 billion less than the necessary scale of need to achieve the objectives of the scheme. Defra needs to plug the finance gap either through increasing public funds or growing nature markets to secure the delivery of legally binding nature and climate targets. In the absence of increased funding, Defra must make effective use of these funds by introducing a payments strategy to enable robust and transparent decisions to be made about what ELM funds and how much these actions pay, taking account of the long term implication for value

³⁷ Defra. (2025). [State of the water environment indicator B3: supporting evidence - GOV.UK](#)



for money, environmental delivery and compliance with our international commitments. Scaling up expertise and advisors available to process Countryside Stewardship Higher Tier (CSHT) schemes is also required, to increase access to these schemes and unlock their full potential.

- A better targeted and packaged approach to the Sustainable Farming Incentive (SFI) could help focus funding on more impactful measures. Existing and new actions should be brought together as part of a ‘Water Friendly Farming’ package within the SFI scheme, to incentivise and support farmers in delivering and sustaining actions that will benefit water quality and the health and resilience of the water environment. This should include payment for actions such as enhancing riparian habitats, creating and/or restoring ponds and wetlands, committing to low-input models with reduced use of added nutrients and chemicals, and lower stocking rates.

Additionally, schemes, programmes and funded actions should include budget for monitoring and evaluation of impacts, so that their contribution towards improving the quality and health of the water environment can be fully assessed and understood.

Question 14: How effective do you think farming regulations are in dealing with agricultural pollution?

Currently, farming regulations – including how they are implemented and enforced - are not sufficient to manage agricultural pollution and agricultural land management impacts in order to improve water quality and recover nature in line with targets under the WFD Regulations and the Environment Act. As stated in response to Q13, agricultural pollution remains one of the most significant pressures acting upon the health of the water environment. Environment Agency data shows that in 2024, farming activities were responsible for 74 serious pollution incidents; this was 12% of all serious pollution incidents in 2024, which the Agency notes was the same percentage as caused by 7 of the 9 water and sewerage companies.³⁸

The success of the Farming Rules for Water in managing agricultural pollution to water has been impeded by statutory guidance (since reviewed and amended) that contradicted the aims

³⁸ Environment Agency. (2025). [Environment Agency Chief Regulator’s report 2024-25 - GOV.UK](#)



of the regulations through effectively allowing or even encouraging breaches with regards to manure application.³⁹

Furthermore, the efficacy and impact of farming regulations have been undermined by poor enforcement and monitoring, and insufficient rates of compliance. In the period January 2020 to December 2021, information obtained by WWF and ClientEarth via FOI showed that in 2,213 Environment Agency inspections, breaches of farming regulations were discovered in almost half of farms. Yet these inspections accounted for less than 2% of farms per year, and only one sanction was applied during the period.⁴⁰

Whilst funding for farm inspections has since had a welcome increase, and numbers of inspections are going up, compliance is still shown to be extremely poor. For example, inspection outcomes published for 2024-2025 show that of 4545 inspections completed, at least one non-compliance was found at 49% of farms, leading to 6870 improvement actions and 884 enforcement responses being issued. The most common breaches relate to the Farming Rules for Water.⁴¹

Of the serious pollution incidents described above, it is notable that only 1 of these incidents was caused by an activity that EA regulate under the Environmental Permitting Regulations (EPR). By contrast, dairy farming caused 46. This supports the case for the introduction of a permit regime for intensive cattle farming via EPR.

Reform is required not only to consolidate but crucially to increase ambition in line with environmental need, and to improve the implementation, monitoring and enforcement of the regulations.

A just, phased transition towards systems level change in nutrient use and management is required, alongside adequate funding and resource for monitoring and enforcement. Regulatory reform to achieve this should be secured through the forthcoming Clean Water Bill, and should be aligned to the Land Use Framework. This phased transition should comprise of the following phases:⁴²

³⁹ WCL. (2024). [WCL Response FRfW Statutory Guidance Review Nov 2024.pdf](#)

⁴⁰ <https://www.clientearth.org/latest/press-office/press-releases/environment-agency-missing-in-action-when-it-comes-to-enforcing-key-regulation-on-nitrogen-pollution/>

⁴¹ [EA Inspection & Compliance Figures for 2024/25 - Agricultural Compliance and Health & Safety Specialists](#)

⁴² For full detail on what a just, phased transition should include:
[WCL eNGO Consensus Regulatory Reform Oct 2025.pdf](#)



- **Setting out the vision for a just transition** – this should include publishing a timeline to give farmers and managers time to plan, and a rapid evidence review in order to understand why previous rounds of capital funding (e.g. for slurry storage) have not achieved the desired results. Ongoing ELM scheme design must spatially target scheme options where they are most needed and will be most effective. The budget for ELM should be increased, and a Water Friendly Farming package introduced with whole-farm measures that can be adopted to improve water quality. There must be provision of free, quality assured, and independent business and environmental advice. Work must begin on designing a national nutrient strategy.
- **Introduce proven ‘no regrets’ changes** – additional regulatory requirements should include having at least six months’ slurry storage (including for digestate), for slurry stores to have impermeable covers, and for the exclusive use of low emission spreading technology. Permitting should be extended to cover intensive beef and dairy, reducing permitting thresholds for pigs and poultry, and bringing sludge under the Environmental Permitting Regulations. Decisions must be made on the basis of the calculated cumulative impact on farm and within a catchment, with cumulative capacity thresholds set well below the point at which catchment ecological conditions could be significantly negatively impacted. Every farm should be required to develop a sustainable nutrient management plan, accounting for all nutrients coming on and off the farm, underpinned by farm-level nutrient balance sheet and risk assessment. This must be matched by nutrient management requirements further up the supply chain, to support farmers in taking environmentally beneficial action.
- **Introduce additional requirements in high-risk areas** – this should include NVZs, near protected sites, catchments with many intensive units, and WFD waterbodies with attributable agricultural RNAGs. Pilots should be implemented for catchment nutrient budgets, alongside a moratorium on the expansion of existing intensive units and the development of new ones in catchments suffering excessive nutrient pollution or where pollution is already affecting sensitive wildlife sites. Additional inspection and enforcement resource should be targeted in higher risk areas. Better control is also needed over acceptable land uses within vulnerable floodplains, with a presumption against intensive arable / pasture, maize cultivation or biofuel crops such as miscanthus, and a presumption in favour of the restoration of species rich habitats.
- **Drive systems-level change at scale** – a national nutrient strategy should be implemented, to avoid pollution swapping and to identify win wins. New Regional



Systems Planners should hold responsibility for designing nutrient pollution reduction strategies, and for setting catchment nutrient targets. These targets should then inform planning, permitting and consenting decisions within the catchment. Catchment nutrient budgets should be widely established, with regular assessments of their performance.

Question 15: What kind of advice and support do farmers and land managers need to take effective action to improve water quality?

Farmers and land managers must have improved access to free, quality-assured, independent business and environmental advice. This will be crucial in securing a just transition to nature-friendly farming, enabling farmers to make changes to their business with confidence. Currently, advice provision is not coherent, and lacks the necessary funding.

Advice and support must function to enable and facilitate water-friendly farming practice that will secure compliance, and drive progress towards targets under the Environment Act and the Water Framework Directive Regulations, as 'translated' and made locally relevant through an enhanced regional planning function. The water bundle mentioned above will also be helpful in this regard. Collectively such measures will allow farmers to make informed decisions, avoid costly mistakes, and successfully transition to methods that will be beneficial for their business and for the environment.

Advice must be coordinated at the local level, pooling skills and resources. For example, empowering initiatives such as Catchment Sensitive Farming to deliver more across a range of environmental objectives. Advice could also be usefully complemented by better supported peer-to-peer learning and farmer networks.

Question 16: Who do you think is best placed to provide advice to farmers and land managers?

Research suggests⁴³ that independent local advisors have greater affinity and trust with farmers and landowners than regulators. This suggests that such independent local advisors are better placed to provide advice, and that advice provision should be separated from enforcement action.

⁴³ WWF. (2018). [WWF Saving The Earth Report HiRes DPS 0.pdf](#)



Greater provision of arm's length body advisors is also required; for example, within Natural England and the Environment Agency, in order to process and support important mechanisms such as CSHT.

Question 17: How can trust in advice to farmers and land managers be strengthened?

The purpose and context for advice must be made clear, with the 'end goal' of good farming practice clearly articulated; delivery of environmental targets, and securing a sustainable and resilient food system and a healthy and flourishing water environment.

Government and its regulators must more clearly set out the strategic vision and direction for the water system, and all sectors that depend upon and impact it – including agriculture. This must include setting clear delivery plans for how targets will be achieved, with a strong new regional systems planning function clarifying where action is needed in order to 'add up' to these national targets.

Farmers must also be given greater support to implement water friendly good practice. As discussed, the budget for ELM must increase, and a new Water Friendly Farming package introduced to further support and incentivise these actions.

Budgets must also reflect the need for advice and processing. Natural England is currently operating on an invite-only basis for CSHT applications, so whilst new business and those in expiring schemes show there is demand, there isn't capacity to unlock the full potential. There is a significant need for schemes, advice and budget to be clearly communicated and consistent. Due to past uncertainties and rapid changes to the schemes, farmers - though keen - are hesitant to start making changes to business and practice without guarantees.

As referenced in response to Q16, trust in advice may also be strengthened through using local independent advisors, as opposed to the regulators themselves.

Question 18: Based on your experience, what types of evidence or monitoring would help build confidence in understanding agriculture's impact on water quality?

Currently, monitoring is not comprehensive enough, including in terms of covering the whole water environment, the full range of pollutants and pressures acting upon it, and the frequency at which monitoring and reporting occurs. Lack of funding and resource means that the number of water quality samples taken and monitoring points has decreased, thereby also decreasing our understanding of impacts on water quality and our ability to track progress to address



them. 43% of river catchments had no water quality samples taken by the Agency in 2023, for example.⁴⁴ As discussed previously, the publication of full WFD results has been reduced to a six-yearly frequency.

A coherent and nested monitoring and evaluation framework is required, developed and implemented to understand both the state of the water environment, and progress made in terms of addressing pressures and improving health and resilience. Programmes of Measures within RBMPs must be specific, time-bound, and demonstrate with certainty how objectives will be achieved; this should include agricultural impacts and pressures, such that effective and efficient measures can be designed and implemented in order to address them.

This should include use of catchment-level nutrient balance sheets, informed by farm-level nutrient balances, to improve understanding of agricultural drivers of pollution and to understand how contributions differ across sectors and pollution sources. Nutrient balance sheets should incorporate data on; agricultural inputs and outputs, livestock densities, manure and digestate applications, sewage sludge application, discharges from other sectors. This information together would provide a clearer understanding of nutrient flows across catchments, and therefore allow interventions to be targeted according to need. Farm-level nutrient balancing will also improve transparency and accountability.

The monitoring framework must therefore relate local and catchment scale measures and objectives to national targets – such as under WFD and the Environment Act – to allow greater understanding of how these actions will ‘add up’ towards delivery, and so that measures can be better targeted in terms of where they will have the greatest benefit.

To achieve this, regulators must be properly funded, resourced and supported by citizen science initiatives which should also be collated and built upon, where appropriate, in order to bring together more diverse sources of data and increase coverage.

Another route to improving monitoring coverage and frequency could lie with redirecting monitoring currently set to be introduced under Section 82 requirements. Under the current approach, large sums of customer money will be spent on a narrow monitoring network measuring very few parameters around sewage assets, leaving significant blind spots in the wider catchment. Instead, Section 82 requirements could be used to deliver a wider, catchment-scale integrated monitoring framework, with practical monitoring plans in place for each catchment designed around specific risks, evidence gaps, and public concerns. Continuous sewage asset monitoring could be maintained in the areas of highest need and importance,

⁴⁴ The Rivers Trust. [Mind the evidence gap](#)



whilst combining Section 82 data with EDM data, company and regulator datasets, targeted investigations, accredited citizen science, and other technologies as appropriate.

Part of the Section 82 budget could be refocused on strengthening regulator capacity for targeted monitoring, source-tracking, investigations and enforcement support. Evidence should then be used to provide clear triggers for action, as opposed to simply gathering data without responding to the information it provides.

Question 19: How should regulation, financial support, and market incentives be balanced to help the farming sector reduce its contribution to water pollution?

Currently, the balance is not right between incentives and enforcement. As discussed in response to Q14, the enforcement capability of the Agency has been constrained by lack of budget, resource and staff capacity, meaning that the regulations are not implemented as intended. This has undermined their efficacy. Whilst consolidating existing regulation will be helpful, this will be insufficient to deliver the improvements to the water environment required, meaning that strengthened regulation is required, alongside advice and incentives.

Currently, incentives offered can be confusing, piecemeal, and are not sufficiently spatially targeted in order to have the greatest benefit. Long-term planning is undermined by incentives and support that do not appear consistent. Furthermore, some market incentives may in fact encourage environmentally damaging production; for example, intensive poultry growth driven by economic structures and supply chain pressures, and failures to account properly for environmental and public health costs within food pricing creating markets that do not reward sustainable and lower pollution farming practices.

The development of a 25-year roadmap for farming provides a vital opportunity to address this balance and to raise business as usual farming standards to reduce harms via regulation, and secure gains through public and private funds. Farming policy must continue the transition to a 'public money for public goods' approach to meet Government's legally binding nature and climate targets, while also increasing the resilience and profitability of farm businesses. This transition must be underpinned by a clear shift to the polluter pays principle, so that those who damage water, soils and air both directly and indirectly bear the costs of restoration, helping to create a level playing field. Fully functioning and effective nature markets, improved fairness in the supply chain and robust trading standards are also critical foundations for a thriving and resilient food and farming sector.

As discussed, a welcome step would be to introduce a Water Friendly Farming bundle under ELM. This should clearly articulate to farmers and landowners what a package of measures to



support and sustain water health and quality would comprise, and should provide sufficient incentives and support to encourage uptake. As discussed, this should include payment for actions such as enhancing riparian habitats, creating and/or restoring ponds and wetlands, committing to low-input models with reduced use of added nutrients and chemicals, and lower stocking rates. Further bundles could be offered for further actions that would be beneficial for the health and resilience of the water environment; for example, a 'river corridors bundle' for actions taken to build space for water such as wetland creation, regenerative agriculture such as floodplain meadows and riparian tree planting.⁴⁵

ELMS currently lacks a mechanism to encourage landowners to work collaboratively across the main components of the scheme (SFI and CSHT); action around watercourses is one area where this could be extremely beneficial, and could be achieved by, for example, offering increases on base payments for watercourse options when taken up by adjacent landowners, in order to encourage the creation of continuous swathes of nature-rich habitat along river corridors.

A further welcome step would be for regulators to remove current blocks to catchment nutrient balancing approaches, to allow and facilitate targeted measures within catchments with sensitive sites requiring nutrient budgets that respect sensitive ecological thresholds. For example, with regard to SSSI condition.

Challenge 7 Pollution from towns, cities and transport

Question 20: What do you see as the main causes of pollution in urban areas?

Runoff from hard surfaces such as roads and highways is a significant source of pollution in urban areas. Highways are a source of contaminants such as exhaust emissions, microplastics from tyre particles, and vehicle fluids that contain heavy metals and toxic chemicals such as polyaromatic hydrocarbons. The impacts of this are particularly exacerbated after dry conditions, when substances have built up and become more concentrated on road surfaces before being washed into sewerage systems, soils, and directly into waterbodies. As a report from CIWEM and Stormwater Shepherds in 2024 highlighted, highway outfalls are largely unmonitored and uncontrolled, meaning that the full extent of their impact on water health is not fully understood.⁴⁶ Garages and carparks are further sources of these pollutants in urban areas.

⁴⁵ Making Space for Water. (2025). [The Briefing \(England\) — Making Space for Water](#)

⁴⁶ Defra. (2019). <https://www.nwl.co.uk/services/sewerage/misconnections/what-is-a-misconnection/>



However, the impacts of highways are not limited to urban areas; they also cut across and impact rural areas. This is not currently reflected in the SWMI document. Highway pollution should be defined as a Significant Water Management Issue in its own right, so that it can be properly assessed and managed. Indeed, as recently as April 2026, the Transport Secretary Heidi Alexander MP has flagged concerns regarding the accuracy and transparency of monitoring and data provision from National Highways generally.⁴⁷

Other sources of pollution and contaminants in urban areas include runoff from industrial sites, and from waste dumping and public litter. Leachate from waste handling and landfill is also a source of pollution within urban areas, given that this can leak into groundwaters and soils. Leachate is a source of heavy metals, PFAS chemicals, PCBs, endocrine disruptors, ammonia, and other organic pollutants. In 2025, it was reported that more than 750,000 tonnes of liquid from landfills was mixed with sewage at wastewater treatment works and the resultant sludge spread on farmland in England each year.⁴⁸

The loss of green spaces within urban areas, such as front gardens, and insufficient sustainable drainage within new development means that these areas are less 'spongy' and therefore less able to slow down or capture water from rainfall. This means increased runoff into sewerage systems, overloading sewers and therefore causing pollution from untreated wastewater to enter waterbodies via outfalls such as CSOs. Indeed, poor rainwater management is a factor in all of the above avenues of urban pollution and should be a growing focus for future management. This means a drive to manage rainwater where it falls, through sustainable drainage in new developments but also in retrofitting, including through creating new areas of blue and green infrastructure.

However, new and existing private gardens and urban green spaces such as parks and golf courses can also be sources of herbicides, pesticides, and other nutrient pollution, the uses / sources of which must be phased out – with Local Authorities able to play a leading role here.

Incorrect or faulty connections with urban homes and developments can also lead to untreated wastewater pollution; for example, if appliances such as dishwashers or utilities such as showers and toilets are wrongly plumbed into a surface water sewer rather than a foul water sewer. Chemicals from cleaning products, plastic debris such as wet wipes and sanitary products, and both excess nutrients and harmful bacteria from waste products can all enter waterways via misconnections. There are an estimated 150,000-500,000 homes in the UK with

⁴⁷ ENDS Report. (2026). [National Highways environment evidence to MPs fell 'below expectations', says transport secretary](#)

⁴⁸ The Guardian. (2025). [Thousands of tonnes of toxic landfill liquid added to sewage and spread on English farms | Farming | The Guardian](#)



a drain misconnection.⁴⁹ Recent cases of longstanding misconnections highlight the important role that Building Control officers must play in inspecting and signing off new developments.⁵⁰

Challenge 8 Pollution from water industry wastewater

Question 21: Which pollution issues linked to water industry wastewater should be prioritised and why?

As discussed, any prioritisation in addressing pollution issues linked to a particular industry, sector or area must be underpinned by rigorous assessment of what pressures are acting upon the water environment, how these are preventing achievement of environmental targets, and where these different pressures are having the greatest impact. Prioritisation must ultimately be steered by scale of need, and in pursuit of delivering the maximum beneficial outcomes for the environment and for society.

Therefore, pollution issues related to water industry wastewater should be prioritised on the basis of the impact they are having in that region or catchment. As discussed, through forthcoming water reform, Government must deliver a strong new regional planning function that can better understand the state and needs of individual regions and catchments, set targets at that level for sector delivery, and steer funding to allow the most effective and efficient measures to be taken.

Pollution issues linked to water industry wastewater include, but are not limited to:

- Nutrient pollution from both treated and untreated wastewater discharges. Excess nutrients within water can lead to eutrophication, reducing dissolved oxygen levels and harming/killing aquatic life. With treated wastewater responsible for a large proportion of water industry RNAGS, different action will be required depending upon whether the discharges having an impact are in compliance with permits (in which case permit reviews and resultant works upgrades will be necessary) or whether they are not compliant, (meaning improvement in performance, and enforcement where necessary, are the solutions). The water industry must be directed to invest in the resilience of infrastructure such as treatment works and sewage pipes, to ensure that this can keep pace with the pressures of a growing population and climate change. Furthermore, actions such as increased rollout of Sustainable Drainage Systems (SuDS) and greater use of nature-based solutions to restore natural processes and improve soil health are

⁴⁹ CIWEM. (2024). [Drain misconnections: How they affect our environment - CIWEM](#)

⁵⁰ [Southampton flats released sewage into river for 35 years - BBC News](#)



required to increase water retention within the environment and reduce runoff into overloaded sewers.

- Emerging and persistent chemical pollutants, such as PFAS and pharmaceuticals. Monitoring frameworks must be expanded to include the full range of chemical pollutants, with precautionary thresholds and early-warning systems. Furthermore, as discussed under Q6, chemical pollution must be better managed at source through banning harmful chemical groups such as PFAS, to prevent them from entering the sewerage and water systems in the first place.
- Plastic, microplastic, and other debris from incorrectly flushed items such as wet wipes and sanitary products. In addition to the recent ban on plastic in wet wipes, Government must encourage a transition away from single-use products and introduce new labelling for all single-use wet wipes to clarify that these products must not be flushed. Screening must also be used, to make sure that debris does not enter the river system via overflows.
- Similarly spills of plastic ‘bio-beads’ from wastewater treatment works, although uncommon, can have significant local consequences for nature. Options to phase out remaining bio-beads as a treatment matrix, and replacement with more modern alternatives, should be investigated through the Price Review process.
- Harmful bacteria from wastewater, posing a threat to human health.
- Nutrient, chemical and microplastic pollution arising from the application of sewage sludge to agricultural land. As discussed in response to Q6, in addition to bringing sewage regulation under the Environmental Permitting Regulations, the application of sewage sludge to farmland must be phased out until it can be proven safe. Furthermore, contaminant monitoring and permit criteria must be strengthened, alongside stronger source control to prevent contaminants entering wastewater in the first place.

Question 22: Which measures do you think should be prioritised in dealing with wastewater pollution?

As the examples discussed in response to Q21 illustrate, there are high impact actions that can be taken that will address multiple sources of pollution, and will build both industry and environmental resilience – meaning that rather than solely addressing damage caused, harm



can be prevented from happening in the first place. These actions should be prioritised. For example:

- Implementing pre-pipe solutions, such as bans (PFAS, single use wet wipes), which will manage pollutants at source and therefore prevent them from reaching the water environment in the first place. This will also reduce the need for costly chemical and carbon-intensive treatment.
- Building the resilience of both industry assets and the environment, to ensure that infrastructure can function effectively and harmful pollution events such as sewage spills can be prevented. As discussed, restoring natural processes and increasing environmental resilience will allow greater interception and storage of water, thereby reducing runoff and avoiding overloading sewage systems. Water industry must also increase investment into the ongoing maintenance of assets, with stronger requirements to do so implemented through forthcoming water reforms.
- Ensuring adequate funding and resource for a truly comprehensive monitoring regime, covering a greater range of pollutants and more of the water environment, such that pressures can be identified earlier, measures better targeted for the greatest impact and efficiency, and progress more effectively assessed.
- Facilitated by this expanded monitoring, focusing on catchment solutions that will enable the most effective and efficient interventions to be implemented in the right places, delivering multiple wider benefits. For example, tackling problems at headwaters within a catchment that unless addressed, will create further challenges downstream. It is notable that many wastewater treatment works in small tributaries and headwater streams have only secondary treatment and are controlled by ‘descriptive permits’ which include no numerical limits for pollutants such as phosphate. Despite discharging into sensitive environments, few works are scheduled for improvements as cost-benefit thresholds are not met. The sector should adopt a Common Values Framework to identify the true costs and benefits of improvements to such works, and even where full-scale improvements cannot be justified, should consider whether there are partial improvements or mitigation measures that would ease pressure on these environments.

Additionally, polluting sectors such as the water industry must **as an absolute minimum** be compliant with regulations; addressing non-compliance and ensuring that regulations can be properly implemented and enforced must therefore also be a priority.



Question 23: Is the balance right between taking short term solutions and considering longer, more nature friendly solutions?

Currently, the balance is not right between short-term and long-term actions and planning in the management of the water system. Blueprint for Water flagged this as a significant concern in our response to the 2025 Independent Water Commission.⁵¹

Long-term planning in the industry has been constrained by multiple factors, including limited guidance from Government on prioritisation and how to manage trade-offs, regulatory requirements placing insufficient weight on resilience and long-term certainty, a lack of timebound, measurable and specific targets through which to track progress, and inconsistencies between regulators creating barriers to more long-term, and/or 'nature-friendly' solutions. For example, a decision by the Environment Agency to end Catchment Nutrient Balancing schemes, despite support from Ofwat, and general steer from Defra to make greater use of catchment solutions.

These challenges are perhaps best exemplified by the water industry Price Review process, which has been overwhelmingly focused on keeping bills low and has not placed sufficient weight on industry and environmental resilience. The Price Review has therefore failed to drive sufficient long-term preparedness and investment within the industry. This has resulted in a water industry that is not resilient, and infrastructure and services that are not fit for purpose or able to withstand the growing pressures of climate change and population growth. This is well evidenced by current unacceptable levels of leakage, and the number of spills from old, poorly maintained wastewater and sewage assets.

Through forthcoming water reform, Government must clearly establish a long-term vision for regulators and regulated sectors and how this will contribute to the achievement of environmental targets and outcomes. This must not be limited to the water industry, but must look across sectors. Long-term targets for the health of the water environment should be established, accompanied with clear delivery pathways setting out with certainty how these will be achieved. This must take heed of the challenges currently undermining the success of RBMPs, and ensure that delivery plans and targets are time-bound, specific, and are afforded sufficient resources and funding for delivery. This must be supported through setting a clear nature and climate duty on regulators to contribute to the delivery of the Environment Act 2021 and Climate Change Act 2008.

Under this steer, longer-term, nature-friendly solutions that build resilience should be prioritised and facilitated by regulators, and the water industry.

⁵¹ WCL. (2025). [WCL Blueprint Cunliffe Call for Evidence April 2025.pdf](#)



Furthermore, we would challenge the implicit assumption within this question that longer-term, 'nature-friendly' options are inherently more complicated, slow, or difficult than shorter-term options. If uptake of longer-term, 'nature friendly' solutions is increased and these options become less marginal, then it is reasonable to assume that the processes for implementing, monitoring and maintaining them will become smoother and more efficient. Indeed, focusing on longer-term solutions and building resilience within both the industry and the environment will likely deliver greater value for money, particularly if 'shorter term' options do not address the root cause or build capacity within the system and will therefore have to be repeated.

Question 24: How can new data and technologies help to address pollution from water industry wastewater?

Up-to-date, comprehensive data on the state of the water environment and on the pollutants and pressures acting upon it is critical to enable pollution from all sectors to be addressed more effectively and efficiently.

For example, existing and future data on sewage discharges should be better utilised in order to prioritise investment towards meeting targets under the Storm Overflows Discharge Reduction Plan. Currently, sewage discharge data is restricted to event duration, and does not clarify the volume of the discharge or its content. This means that the data does not tell us how polluting a discharge is, because event duration is not a suitable proxy for impact or damage caused. For example, an intermittent, high concentration discharge may have a greater impact on the environment than a consistent trickle from a less concentrated source.

State of nature decline

Question 26: What do you see as the biggest opportunities and barriers to scaling up and accelerating nature recovery through these approaches? How could these challenges be overcome (are there good examples we can learn from)?

Opportunities to scale up nature recovery can be realised through better linking nature restoration to not only the benefits it brings for water management and the water environment, but also for delivering against wider objectives to achieve net zero, mitigate climate change impacts, reduce the impacts of flooding, increase health and wellbeing benefits, and so on.⁵²

⁵² For example: The Wildlife Trusts. (2025). [Assessing the multiple benefits of NFM A06.indd](#)



As discussed, this can be unlocked through more strategic planning and alignment of funds via new Regional Systems Planning to facilitate approaches that can deliver multiple benefits across catchments.

Protecting, restoring and creating new small water habitats

Small waters and headwaters bring significant opportunities for scaling up nature's recovery, both in terms of better protecting these habitats, and amplifying efforts to restore and create new habitats. Around 75% of England's freshwaters are small water bodies, supporting over 70% of our freshwater species and providing essential resources and connectivity across landscapes.

These small water habitats represent a significant opportunity to take efficient, effective measures to drive environmental improvement for the freshwater network in the short to medium term.⁵³ This is because high-quality small waters can be created and restored rapidly, at relatively low cost; these waterbodies respond quickly to restoration and therefore can bring significant improvements within years rather than decades. Furthermore, improving the health and quality of the water environment upstream at headwaters will be beneficial to habitats and stretches of water further downstream. Restored headwaters are sources of resilience, providing refuge for sensitive plants and animals and facilitating recolonisation downstream.⁵⁴

For example, it is estimated that doubling the density of ponds in England would cost approximately £1.5bn. This action would increase the abundance of wetland plants by as much as 40%, and boost populations of half of all freshwater species of principal importance listed under Section 41 of the Natural Environment and Communities Act (2006).⁵⁵

Barriers to scaling up and accelerating nature recovery through protecting, restoring and creating new small water habitats include:

- **Lack of routine monitoring.** WFD monitoring currently excludes most standing waters less than 50 hectares. It also combines about three quarters of all headwaters with downstream waters, meaning that specific pressures are not identified and actions to address them not prioritised.

⁵³ Further detail can be found in our Charter for Small Waters:

WCL. (2024). [WCL Small Waters Charter 2024.pdf](#)

⁵⁴ Freshwater Habitats Trust. (2025). [Headstart-report-Freshwater-Habitats-Trust-March-2025.pdf](#)

⁵⁵ Williams, P., Biggs, J., Stoate, C., Szczer, J., Brown, C., & Bonney, S. (2020). Nature based measures increase freshwater biodiversity in agricultural catchments. *Biological Conservation*, 244, 108515.



- **Small water conservation is overlooked in environmental targets.** Policies and targets such as 30 by 30 do not incentivise protection and restoration of small waters, because they make a limited contribution to area-based targets. Similarly, pollution targets based on gross pollutant loads deprioritise small waters, as the gross volume of pollutants these waters receive is relatively small compared with larger waterbodies – even though the ecological impacts are still significant.

To address these challenges, through forthcoming water reforms Government should expand the scope of WFD to include small waterbodies and headwaters explicitly. RBMP PoMs should include specific, time-bound measures to address threats to small water habitats. Measures for small water protection and restoration should also be fully within scope for new regional planning functions, and within catchment plans.

This should be supported through further promotion and prioritisation of small water restoration and creation in wider policy. For example, farmers could be better supported and incentivised to take these actions through further relevant options under ELM, or through greater provision of advice through Catchment Sensitive Farming at headwater catchments as a priority.

River buffers and corridors

Making space alongside rivers and other waterbodies also presents a significant opportunity for accelerating nature recovery. Creating buffering corridors of natural habitats such as wetlands not only supports biodiversity, but helps to build natural resilience against threats such as flooding, drought, and pollution. These corridors of habitat will also help connect wildlife across landscapes, boosting wider nature recovery.⁵⁶

Government should commit to create a network of connected, nature-rich, multi-functional river corridors including river buffers, floodplain meadows, riparian tree planting, and wetlands. To help deliver this, targeted and simplified financial incentives should be offered for farmers and landowners to restore and enhance river corridors, including payments for buffers, meadows, wetlands, and riparian tree planting. This should come alongside a regulatory requirement for farmers to create and maintain habitat strips along major waterways and on public land. Incentives for floodplain restoration are already available through CSHT such as CGS18 - however access to this funding is currently limited.

⁵⁶ Case study details can be read here:
Making Space for Water. [The Briefing \(England\) — Making Space for Water](#)



Through the new, stronger regional planning function, a network of nature-rich and connected habitats should be mapped in each region that will help to meet water targets and biodiversity goals, in line with Local Nature Recovery Strategies.

Addressing implementation challenges

The consultation document refers to significant changes made since the last round of River Basin Management Planning, including the introduction of legally-binding targets to halt the decline of and recover nature. A further significant change since the last round is the Costa Beck case, which concluded that Programmes of Measures (PoMs) must include specific actions directed at individual rivers.

Ensuring that Programmes of Measures are specific to the needs of individual waterbodies is itself a significant opportunity for Government and the Environment Agency to address historic implementation challenges and therefore accelerate nature recovery. For example, ensuring that all parties and sectors are actively involved in plan delivery, providing adequate funding and resource to ensure measures can be delivered, and monitoring progress to ensure that any targets that are not on track can be spotted and dealt with as early as possible. Regional System Planning could play a key role in achieving this, for example by providing mechanisms through which sector funds could be pooled based on best environmental outcomes.

Question 27: What data and information do you need to target investment and action to deliver wildlife-rich water habitat and benefits for water-dependent species (locally and on a larger scale)?

As discussed under Q26, planning and mapping networks of wildlife-rich, connected habitats should comprise a significant part of the role of new regional systems planning for water, whether this is through dedicated Regional Systems Planner bodies or through the new regulator. This will require assessment of – and therefore information on - how habitats in each region can contribute to the delivery of biodiversity and water targets, including the target to halt species decline under the Environment Act 2021.

Question 28: What actions are needed to enable the recovery of estuarine and coastal environments, ensuring they deliver long-term benefits for biodiversity and climate resilience, while supporting thriving coastal communities?

Whilst actions delivered directly in coastal areas may be out of scope for many of the organisations delivering across catchments, more could be done to ensure that catchment



deliverers are aware of the main pressures impacting coastal and estuarine areas downstream of them in order that they can factor these into their planning and prioritisation.

For estuarine and coastal environments to recover, significant nutrient pollution reductions must be secured across all sectors. For example, nutrient and sediment inputs are detrimental for seagrass beds and other marine ecosystems, creating an extra driver to deliver works across catchments that reduce these pressures. A 2026 study suggests increased nitrogen could correspond with an approximate 90% decrease in the abundance of life per unit of available habitat area in seagrass meadows.⁵⁷

Local Partnerships

Question 29: How can local delivery partnerships be strengthened to better achieve priority outcomes in the water sector, while preserving their unique local relevance?

Local delivery partnerships, such as catchment partnerships under the Catchment-Based Approach (CaBA), need clearer, more strategic guidance from Government regarding the vision for the water system and targets that need to be achieved to deliver that vision at national scale. This should be set out in a clear strategy or delivery plan, including steer on prioritisation and managing trade-offs, at the national level.

Government must then, through forthcoming water reforms, introduce a strong new regional planning function that can translate these national priorities and steer into regional and local level targets across sectors, setting actions and both aggregating and directing funding to support delivery. This will provide greater clarity to local partnerships in terms of action needed to secure priority outcomes, and how work is needed across partners and sectors to achieve this.

This clearer steer must be supported through Government addressing key implementation challenges that have thus far undermined local partnerships, most significantly funding and resource. Whilst the recent uptick in funding for CaBA partnerships is welcome, this is still not enough to match the scale of need, particularly given the anticipated role for CaBA partnerships to 'plug into' and support new regional systems planning work. Providing more resource for CaBA partnerships will return significant benefit; in 2023-2024, for every £1 directed by Government, CaBA partnerships raised £3 from non-Government funders⁵⁸ and have secured approximately this level of funding leverage annually for the past ten years or more.

⁵⁷ [Increasing nutrients negatively impact seagrass-associated biodiversity - ScienceDirect](#)

⁵⁸ CaBA. (2025). [CaBA Monitoring and Evaluation Report](#).



New regional systems planning will also need to be properly funded, whether taken forward as dedicated regional systems planning bodies, or integrated as part of the new water regulator. Regional planning must have statutory backing, to avoid partnerships simply becoming talking shops and plans lacking the weight to drive action.

Blueprint for Water is supportive of recommendations made by the Independent Water Commission regarding the need for strengthened catchment-based governance.

Question 30: What information, guidance, or tools do local partnerships need to drive action towards a healthier water environment with broad environmental, social, and economic benefits?

As discussed under Q29, local partnerships must be properly funded and resourced in order to implement plans and actions, as per a clearly articulated, strategic vision issued by Government and translated into regional and local scale targets through regional systems planning. Local partnerships must also have sufficient funding to develop the necessary skills and expertise to do this.

Local partnerships must also have improved access to data. Whilst there is already a comprehensive data hub set up for CaBA partnerships, for example, this is lacking data that the Environment Agency has not made accessible. For example, data on Recent Actual Abstraction, how much water has been abstracted at a regional scale by sector, or modelling information on where abstraction impacts are felt in greater detail than at WFD waterbody level. Government should create a secure, cross-sector platform that aggregates data from regulators, industry, academia and citizen scientists.⁵⁹

As flagged in response to Q18, nutrient balance sheets are a critical tool for understanding nutrient flows across sources in a catchment that can support local partnerships to target action where it is most needed, and to support the implementation of catchment nutrient budgets.

The adoption of a multi-benefits approach through regional planning, for example such as through the Common Values Framework developed through the Mainstreaming Nature-based Solutions Programme, will aid in ensuring that the outcomes that regional planning seeks to achieve include benefits to biodiversity, flood risk management and so on, rather than to narrower water quality and water resources considerations which could otherwise dominate. This will help to steer cost-effective delivery by Catchment Partnerships and other deliverers.

⁵⁹ CaSTCo. (2025). [Independent Water Commission Recommendations - CastCo.](#)



Evidence

Question 33: Let us know if there is an issue you consider significant which hasn't been covered in this consultation (tick box that applies or add under 'other') Fine Sediment Plastics Microplastics Pollution from abandoned mines Pollution from private domestic treatment plants Other

The following significant water management issues have been less well covered in this consultation:

- Highways – whilst road runoff was referenced within ‘Challenge 7: Pollution from towns, cities and transport’, this considers roads solely in the context of ‘urban pollution’, neglecting wider impacts such as in the rural environment. Highways are a significant, and yet under assessed source of pollution, and should therefore be considered in greater detail.
- Flooding and drought – where water use and availability is considered in the consultation, this is very focused on abstraction, and does not sufficiently consider the threats of flooding and drought, or the lack of natural/environmental resilience to extreme weather and climate change more generally.
- Private sewerage – this issue is significant in certain localities and should not be overlooked. Previous work by Natural England to identify protected areas potentially impacted should be revisited and acted upon when waterbody-specific measures are being identified for RBMP4.
- Misconnections – as flagged in response to Q20, incorrect or faulty connections within homes and developments can be a significant source of pollution to water, yet this issue is not directly considered within the consultation.
- Fine Sediment — the consultation refers to water quality in the agricultural pollution challenge, but fine sediment is a major impact from agriculture for streams, rivers and estuaries changing the physical structure (morphology), chemical, biological and habitat diversity of the water environment. 11% of English rivers are at high or very high risk



from agricultural fine sediment, and 14% are at moderate levels of risk.⁶⁰ It has very significant impact on the ability to achieve nature recovery as it is an ongoing process, that needs to be addressed through better land management, and can damage the long-term benefits of restoration efforts in the channel and on floodplains.

- Sewage sludge – the consultation does not consider the movement of nutrients and contaminants between wastewater treatment, agricultural land, and the wider water environment via sewage sludge. RBMPs should more clearly assess the cumulative impacts of sludge spreading, particularly within nutrient-stressed catchments.

Additionally, many of the questions in this consultation have focused on ‘water quality’ or ‘pollution’, rather than the ‘quality of the water environment’. In taking this narrow focus, the consultation does not consider many of the factors and pressures acting upon the water environment, and responsible for its overall health. For example, Q20 focuses on the main sources of *pollution* in urban areas, but neglects other pressures and drivers within this context; for example, habitat loss, development pressures, and so on.

About you

‘About you’ question 1: 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.

Responding on behalf of an organisation – Wildlife and Countryside Link, eNGO.

‘About you’ question 2: What is your email address?

eleanor@wcl.org.uk

Please add me to the notification email list.

⁶⁰ Naura et al. (2016). Mapping the combined risk of agricultural fine sediment input and accumulation for riverine ecosystems across England and Wales.



'About you' question 3: 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)

'About you' question 4: Are you happy for us to publish or quote your response?

Yes.

'About you' question 5: Finally, it would really help us if you let us know where you found out about this consultation.

Email from the Environment Agency

Through engagement with Environment Agency

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 97 organisations to protect the natural world. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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- Angling Trust
- Fidra
- Freshwater Habitats Trust
- Friends of the Earth
- Institute of Fisheries Management
- Marine Conservation Society



Wildlife and
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- Paddle UK
- River Action
- River Restoration Centre
- The Rivers Trust
- The Wildlife Trusts
- ZSL