



Humber WFD Team,  
Rivers House,  
21 Park Square South,  
Leeds,  
LS1 2QG

Dear Humber WFD Team,

Thank you for giving the Salmon & Trout Association the opportunity to respond generically to the consultation on the 'Draft River Basin Management Plans'. We would like to highlight that this is our preliminary response to the consultation, and wish to reserve the right to update our response as further information becomes available in the consultation period.

The Salmon & Trout Association (S&TA), which was awarded charitable status due to our work concerning fish stock management and aquatic conservation, has over 80,000 individual and club members. We represent the public interest over issues relevant to the management and conservation of water, the aquatic environment and all its dependent species.

Overall, S&TA is concerned with the extremely low level of ambition in the first River Basin Management Plan (RBMP) cycle. We do not feel this demonstrates a commitment to a phased approach of achieving 'good ecological status' (GES) in all water bodies by 2027. A positive step to help demonstrate this would be to move the most effective and ambitious Scenario C measures to Scenario B, to ensure real progress is made in the cycle. As the Plans stand at present, we do not feel they form part of a credible strategy for WFD delivery over the next eighteen years.

We believe in order to achieve GES in all waterbodies by 2027, the issues of excessive water abstraction and excess fine sediment reaching our water courses must be particularly addressed. Without addressing these overarching issues, we feel little ecological benefit can be delivered through WFD. We urge the RBMPs, with the support of Government, to tackle these two fundamental issues threatening good ecological status.

### **Humber Draft River Basin Management Plan**

With specific regard to the Humber Draft River Basin Management Plan, S&TA has collected views on the plan from our local members and affiliated branches.

Overall our members feel the Humber River Basin Draft Management Plan has largely ignored the Yorkshire Dales rivers. They feel this could be because the River Ure, and the other dales rivers, do not have the industrial past associated with the other rivers of the Humber basin and the problems have therefore not been perceived as great or as important. Our members do not believe the problems in these

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rivers have even been considered, and it should be remembered that some of the difficulties experienced in towns downstream originate up in the dales area, e.g. the frequent floods. Hence, action taken in the Dales could benefit communities all the way down the river system. Local S&TA members' concerns include:

1. Flash floods. These are now a much more regular occurrence and cause significant damage due to increased building development and moorland gripping. Gripping of the moors in particular results in the uplands no longer being able to act as a sponge to retain the water and release it slowly. This causes more frequent flash floods, resulting in sediment being washed down from the moors. The grips require blocking to be carried out as a priority, as this is causing increased bank erosion, and damage to spawning beds.
2. Periods of low flows. Exacerbated by poor land management, low flows are reducing the dilution of pollution. Areas of river bed are drying out altogether, which is very damaging for spawning gravels and also invertebrates. Low flows reduce water oxygen levels, and increases water temperatures, which both threaten fish survival. Although abstraction limits have been agreed with the Environment Agency, members believe too much water is abstracted when the river is at low summer levels. The Upper River Nidd above Gouthwaite reservoir has particular problems with the absence of minimum flow regulations on the discharge from Scar House reservoir. Yorkshire Water is able to completely stop the flow from this reservoir. Any water in the river below Scar House dam is from tributaries, and the main tributary, Stean Beck, is subject to diversion into Scar House, thus reducing the flow even more. Within a day or so of a spate, the flow in the river is severely reduced and pools soon become almost stagnant, with scum on top. There is local concern that these low flows are having a detrimental impact on fish stocks in what should be major spawning and recruitment area for both trout and grayling. Members report that grayling numbers have noticeably decreased over the past 20 years. The plan does not go into sufficient detail to establish whether this issue will be addressed.
3. Increased sediment burden. This is due to severe erosion of moorland grips, and changes in agriculture, which has led to more maize being grown on what used to be permanent grassland. Locals also believe that river and stream banks are now suffering increased poaching from densely stocked cattle, etc.
4. Increased tourism has led to increased pressure on the river environment in the Yorkshire Dales, particularly from local sewage treatment plants. Wensleydale in summer is a honeypot for holidaymakers – particularly Hawes, Askrigg, Bainbridge and Aysgarth on the upper river. Consequently the population is hugely increased at these times. There is evidence to suggest that nitrates and phosphates are present in the river directly from the sewage works in summer months, when the flow is at its lowest level (aggravated by abstractions). Eutrophication takes place at this time in periods of low rainfall.
5. Agricultural practises. Problems are caused by sheep-dip (cypermethryn) due to intensification of agriculture, and also nitrates and phosphates from the fields traditionally grazed but now intensively cultivated for maize growing adjacent to rivers. Without buffer strips, run-off into rivers is unavoidable. Many fields have been drained, which also leads directly to increased run-off and contamination of the river.
6. Bank erosion is changing the nature of the river in many parts – it has become shallower and wider and less conducive to fish. It would benefit from tree planting on the banks in many places, and the creation of buffer strips

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7. Alien species: Red clawed crayfish are well established in parts of the River Ure. Native white clawed crayfish are suffering from all the above causes in much the same way as fly-life and fish. Non native plants are also spreading along the banks – most notably Himalayan balsam - to the detriment of native species.

Members also feel that there is evidence, through observation, that fly life is not as it was. It obviously suffers when the river shrinks in low flows but also when eutrophication takes place. Species of fly may also be changing – something locals believe the fly-life surveys now taking place will substantiate in coming years. Surface fly is very rarely in evidence now compared with a few years ago.

### **Process**

Overall we feel the process is still lacking transparency, which makes it very difficult for stakeholders to understand how decisions have been made. In order to have true engagement in the consultation process, and in order to enable stakeholder co-delivery requires details of the process to be made clear.

It is clear that in most cases further information is needed about individual water bodies – including causes of failure, which measures have been considered for the water body, and why they have been considered to be either technically infeasible or disproportionately costly. Without this specific detail it is extremely difficult for us to meaningfully comment on these plans with regard to specific water bodies.

S&TA is still concerned about the lack of additional resources being made available to the Environment Agency (EA) to deliver WFD. The latest WFD related consultation on Water Protection Zones (WPZ) implies that the success of WPZ designation will depend on EA monitoring, analysis and modelling. We are concerned that with the EA's restricted resources, this will lead to limited WPZ actually being designated. The success of RBMP also requires a commitment to better resourcing for existing enforcement, ensuring that EA makes the most of its existing powers.

We support the proposal to establish a River Restoration Fund, accessible to approved charitable and voluntary bodies, as well the EA. We believe this fund, as well as providing a new source of finance for local projects, should also enable funds derived from polluter pays' cases to be directly reinvested into the affected water body.

The final RBMPs need also to illustrate how WFD will be integrated with Flood risk strategies, Water Company Water Resources Plans, and EA Strategies, such as Fisheries Action Plans, CAMS, Hydro-generation and development plans, to ensure holistic management and integrated resources. S&TA believes that it is only by coordinating all these initiatives into individual catchment based plans that full benefit can be gained and, vitally, most efficient use be made of limited resources.

Finally, we would like to stress our support for both Defra and the EA. We wish to work with both organisations at all levels, in particular through the Riverfly Partnership and in research projects to improve our understanding of issues related to WFD, and in monitoring through the AMI. Our aim is to maximise the benefits offered by WFD for the aquatic environment, all its dependent species and the general public over the coming years.

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Generically, the S&TA feels that, in order to meet *good ecological status*, the plans must provide action on;

**Unsustainable abstractions;** this requires

- An urgent review of the CAMS process to: 1) to enforce the Precautionary Principle where limited data exist, and 2) take full account of the necessary dilution requirements needed to reduce the impact of consented discharges and diffuse pollution.
- The Government to quantify the effectiveness of the Restoring Sustainable Abstraction (RSA) Programme and revise on the basis of lessons learned.
- Action to make all existing licences time-limited, and to remove the requirement to provide compensation to the licence holder if the abstraction is causing environmental damage.
- Sufficient funding for monitoring, so that the impacts of abstraction can be separated from other stressors to provide clear evidence of the environmental damage caused by abstractions, and to fund research to distinguish human impacts on flow regimes from the effects of climate change.

**Hydropower**

WFD must ensure sufficient water flow 1) over weirs connected with hydropower schemes so they do not impede migration corridors, and 2) to address the potential for depleted reaches of aquatic habitat between water abstraction and discharge sites.

**Excess Fine Sediments;** this requires

- Urgent action by Defra to identify and use a suitable *methodology and framework* for establishing *local* sediment targets *that will enable good ecological status to be achieved in catchments* across England and Wales under WFD, taking better account of the impacts of sediment on ecology. This framework must be available at the latest for inclusion in the 2<sup>nd</sup> cycle of WFD delivery.
- Defra to monitor and quantify the efficacy of sediment mitigation options identified in the Inventory of Methods to Control Diffuse Water Pollution from Agriculture User Manual so that mitigation programmes such as the England Catchment Sensitive Farming Delivery Initiative can be accessed. If quantifiable improvements cannot be shown, further measures (compulsory if necessary) must be put in place, such as Water Protection zones (WPZ).

**Transitional Waters**

There is a greater need within the RBMPs to address issues within transitional waters, which we feel have been largely forgotten within the process. Intertidal habitats provide key feeding and nursery habitats for a wide variety of fish species, and we therefore urge for further action, research and protection for transitional waters. Within this issue, we also feel that nitrates, the limiting nutrient in saline conditions, are being treated as somewhat inferior to phosphates, and should not become the 'forgotten' nutrient.

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## Monitoring and Research

We do not agree that regulatory action should only be taken if the EA is 95% confident the water body is at less than good status. We feel the balance of evidence approach would be more appropriate as the level of certainty required should be proportionate to the potential expenditure, or impacts on a specific sector. It is of paramount importance that the RBMPs establish monitoring networks to increase certainty and identify currently unknown causes of biological failure, to better inform the second cycle. Defra and the EA must also start investing now into research to better inform the second cycle of WFD

Existing stakeholder monitoring initiatives must be fully utilised in the WFD process in order to progress.

### **The Riverfly Partnership Anglers Monitoring Initiative**

The Anglers' Monitoring Initiative (AMI), led by the Riverfly Partnership (RP), offers particular opportunities to help determine the effectiveness of measures designed to produce good ecological status in water bodies through an established, regular monitoring programme. AMI also acts as a deterrent to incidental polluters, and produces long term data sets, both at catchment and national levels. AMI has the proven ability to specifically identify severe changes in water quality, should they occur, ensuring early remedial action by the EA. Importantly, AMI demonstrates partnership/community/stakeholder engagement to aid the identification of water quality problems, where these have not been precisely located or identified. Despite these extensive advantages, AMI is not recognised in the draft RBMPs. The EA is a member of the RP and provides significant funds towards operating the initiative.

**We therefore urge that the RP is included in all RBMPs. We support fully support the RP individual response to the draft RBMPs.**

Yours sincerely

Paul Knight  
Chief Executive

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