

Agenda Item 9

Executive Member	Councillor John Northcott
Strategic Management Team Lead Officer	James Lalor
Author	Rod Shaw
Telephone	01306 879247
Email	rod.shaw@molevalley.gov.uk
Date	13 th January 2015

Ward (s) affected	Ashtead, Leatherhead North and South, Fetcham West and East, Mickleham, Westhumble and Pixham, Dorking North and South, Brockham, Betchworth and Buckland, Capel, Leigh and Newdigate, Charlwood, Westcott, Leith Hill	Key Decision	Yes
Subject	Consultation on the draft update to the River Basin Management Plan for the Thames River Basin District		
RECOMMENDATIONS			
That the Executive agree the responses to the set questions raised in the Environment Agency's consultation on the Draft Thames Basin Catchment Management Plan as set out in Section 6 of this report.			

EXECUTIVE SUMMAR

The Environment Agency has issued for consultation the first draft update of the management plan for the Thames Basin District. This includes the River Mole Catchment, one of 17 catchments within the Thames Basin.

The report sets out the role of the management plan and its purpose and objectives with particular reference to The Mole Catchment. It looks at the implications of the management plan for the current and future water quality within the catchment and for Protected Areas, namely ground water aquifers and internationally important wildlife sites.

The report looks at the options for meeting statutory obligations under the Water Framework Directive and provides responses to questions raised in the consultation on the management plan.

CORPORATE OBJECTIVES

ACCESS TO SERVICES

Helping residents to access the services they need. The Environment Agency (EA) recognises that improvements to the water environment will require concerted action from many agencies including the local community. During the consultation the EA has sought to bring into the process a range of local organisations and acknowledges the voluntary sector's part in meeting objectives of the Water Framework Directive.

ENVIRONMENT

Maintaining the character and environment of Mole Valley. The water environment is of vital importance to an area such as Mole Valley where ground water and surface water bodies are vital to health and well-being. Some wildlife sites are water sensitive and dependent of a healthy water system. Flooding is not covered directly by the management plan but acknowledged as intimately linked to flood management strategies. A healthy, natural river system will be more resilient to flooding.

VALUE FOR MONEY

Delivering value for money services. The management plan includes a cost benefit analysis and seeks to explore various scenarios for meeting plan objectives based on an understanding of costs/benefits. It also recognizes that the water environment can produce financial benefits which are not always given a value, sometimes referred to as ecosystem services.

The management plan provides a basis for developing programmes for action which in turn provide opportunities to bid for government funding and lever in private sector and voluntary support. Innovative ways of achieving benefits will need to be considered given the shortage of conventional funding

The Executive has the authority to determine the Recommendations

1.0 BACKGROUND

- 1.1 The legislative basis for managing the water environment throughout Europe is the Water Framework Directive (WFD). The WFD requires measures to be taken to encourage sustainable use of water and to protect and improve inland surface waters, groundwaters and coastal waters. To help achieve this goal, the WFD requires that a management plan is prepared for each river basin district. The Thames River Basin is one of 17 Districts nationally. Within it are a series of river catchments, one of which the River Mole and its tributaries and the Rythe. The Mole is itself divided into a series of operational catchments. Characteristics of the catchment are described in section 2 of the report on the draft Flood Risk Management Plan elsewhere on the agenda.
- 1.2 The first river basin management plan for the Thames River Basin District was published in December 2009. The WFD requires that plans are reviewed and updated every 6 years and the Environment Agency has issued an update for consultation with a view to adopting it in December 2015. This will run until 2021. Once adopted, the environmental objectives are legally binding. All public bodies must have regard to the river basin management plan when exercising any functions affecting the water environment.
- 1.3 The updated plan will take account of changing circumstances, for example investment plans by water companies, flood risk management plans and updates to water quality and biological standards. In particular, new plans will be assisted by more complete monitoring and data on the condition of surface and ground water.

2.0 THE MOLE CATCHMENT

- 2.1 For the purpose of this report the focus is on what the management plan says about the Mole Catchment and, in particular on the Lower Mole, Reigate Lower

Greensand Groundwater and Dorking North Downs Chalk operational catchments. These are the operational catchments that fall within the MVDC administrative area. The Thames river basin is an area of below average rainfall. It contains valuable ground water contained in the Chalk aquifer and Lower Greensand. It is also characterised by a network of surface water bodies draining into the River Mole. Within the catchment are important water-dependent wildlife sites of international importance. Mole Catchment consists of 20 river bodies, 4 lakes and 6 groundwater bodies. 6 further groundwater bodies slightly overlap into the Catchment.

- 2.2 Certain parts of the catchment are referred to as 'Protected Areas'. In Mole Valley these are either the important wildlife sites associated with parts of the North Downs or the ground water of the Lower Greensand which forms a narrow sliver of land between Westcott and Redhill, and the chalk aquifer. These ground waters are sources of drinking water. These Protected Areas are a priority for action and protection.
- 2.3 In addition, the whole of the Mole catchment is classified as a nitrate sensitive zone where nitrate concentrations in drinking water exceed or are at risk of exceeding statutory limits. Much of the leaching of nitrates results from agricultural practices. The leaching of chemical and other pollutants forms a significant source of diffuse pollution which is difficult to mitigate and manage.

3.0 CURRENT STATE OF SURFACE AND GROUND WATERS

- 3.1 The general aim of the WFD is to achieve 'good' status for all waters by 2021. The condition of water ranges from 'high' through to 'good', 'moderate', 'poor' and 'bad'. Good status represents conditions close to an undisturbed natural environment.
- 3.2 Since 2009 the majority of water bodies have seen no change in status. Where a reduction in status has been recorded the reason is considered to be caused by an improvement in monitoring rather than a real change in status. Of the groundwater bodies of most interest, the Dorking North Downs Chalk and the Reigate Lower Greensand are both classified as poor. Ground water is at risk from rising concentrations of pollutants and over abstraction. Two safeguard zones have been developed to protect groundwater. These are referred to as Drinking Water Protected Areas. Measures to protect groundwater include working with the agricultural and horticultural sectors, planning authorities and the water industry to manage diffuse pollution impacts and secure remediation of land contamination.
- 3.3 In 2013, of the 36 water bodies within the catchment, 8 are classified as Good, 11 as Moderate, 16 as Poor and 1 as Bad. Across The Mole catchment the majority of its area is classified as Moderate. The exceptions are the north west corner from Downside to Polesden Lacey which is the only area that currently meets the WFD objective, and North Holmwood and Capel/Newdigate/Charlwood which is Bad.
- 3.4 The challenges to be overcome if the objectives of the WFD within the Mole Catchment are to be met and water bodies achieve Good Status have been set out in the management plan. Pollution from waste water is the main challenge. This includes pollution from treated sewage discharges containing phosphate and sometimes ammonia. The presence of these pollutants affects the water's ability to support fish and invertebrates. Another significant challenge is legacy of insensitive, man-made modifications to the shape and flow of the rivers. These modifications have dramatically changed the riparian habitat and introduced

- barriers to fish movements. Diffuse pollution along the River Mole is a third significant concern. This is pollution from widespread activities, notably run off from fields containing pollutants, but also urban run-off from roads and misconnections from properties adding waste water to surface water.
- 3.5 These issues demonstrate the importance of working together. The Government is encouraging the formation of Catchment Partnerships to bring partners together. The River Mole Catchment Partnership (RMCP) is a relatively new partnership and is one of 18 partnerships in the Thames Basin. It has been involved in the consultations associated with the review of the management plan. This consultation is significant in that it drew together people and organisations who have not worked together before and it included parish councils and residents associations alongside river professionals, leisure interests and local authorities. The RMCP is being led by the Surrey Wildlife Trust and the South East Rivers Trust. MVDC is represented on the RMCP at officer level alongside Natural England, the water companies, National Trust and Gatwick Airport Limited amongst others. It is early days in the life of the RMCP and it remains to be seen how effective it will be. However, a good start has been made. The RMCP plans to develop its vision for a healthier catchment in the coming months and produce a plan specifically for The Mole. The value of this is both as a tool for co-ordinated action but also as a basis for bidding for funds to support projects. A catchment plan is an essential step in moving forward.
- 3.6 Since 2009 a few projects have been completed on the Mole, most of which have been outside the MVDC area. It is acknowledged by the EA that relatively few projects have been carried out. This is attributed to the lack of evidence and data to support projects. It is now considered that this gap in evidence has been more fully addressed. There are encouraging signs in relation to surface water as opportunities are beginning to present themselves. The Ashted Rye Meadows initiative is a good example of where a private landowner has been able to work with the Surrey Wildlife Trust, EA, Lower Mole Project and local volunteers to undertake habitat and floodplain improvements and remove the barriers to fish movements along a significant stretch of the Rye Brook. This is one of a number of initiatives linked to the Rye, including improvements on Council-owned land at River Lane Meadows in Fetcham with assistance from the Lower Mole Project. Surveys of the Rye are being carried out to look at ways of connecting these habitat improvements.
- 3.7 The River Corridor Local Nature Reserve through Leatherhead also provides opportunities to undertake enhancements. Links have been made with the owner of one of the river islands and a start has been made on habitat improvements there. Particularly encouraging has been the formation of a volunteer group that has had an impact of the control of Himalayan Balsam along the Leatherhead stretch of the river. Training has been provided by Surrey Wildlife Trust. The Trust is also training volunteers to monitor sections of the river so that a better picture of the health of the Mole can be gauged, known as 'River Watch'. On the Upper Mole, assisted by the Gatwick Greenspace Partnership, other volunteer groups have been working in a similar way so that there is now a better prospect of controlling invasive species along the whole of The Mole as well as undertaking other habitat improvements.
- 3.8 The RMCP has decided that it will look first at a project for the Pipp Brook with a view to removing the barriers to fish movements. This is just at the investigation stage but could be an interesting development for this part of the river system.

- 3.9 These measures demonstrate the value of joint working, including the benefits of community involvement. Government policy is to facilitate more local action. It is recognised that a holistic approach is needed since the issues associated with the condition of surface waters and ground waters are not the result of one single problem. The EA has looked at the measures that would make a difference and these are categorised as follows:
- Improve modified physical habitats – removal of barriers to fish, removal or modification of engineering structures, vegetation management etc.
 - Managing pollution from waste water – reducing diffuse pollution at source etc.
 - Managing pollution from urban areas and transport – managing invasive species, reducing diffuse pollution such as controlling entry into the water environment.
 - Managing pollution in rural areas.
- 3.10 An important element of the River Basin Management Plan is an assessment of the economic, social and environmental benefits. Particular stress is placed on assessing the costs and benefits as this will be important in justifying future investment. This analysis is favourable so far as the Lower Mole operational catchment is concerned which covers much of the MVDC administrative area. Here the prediction in the management plan is that there is 'medium' confidence that this section of the catchment will see an improvement towards the proposed long term objectives by 2021.
- 3.11 Within the operational catchment of the Reigate Lower Greensand running in a narrow corridor from Westcott to Redhill, the focus is on ground water. It is a Drinking Water Protected Area. The status of the groundwater has not changed since 2009 and the long term prospect is that it should achieve Good status. The chemical status of the water is Good but there is concern over rising trends of pollutants and the objective in the short term is to prevent a loss of status. The overall assessment is Poor because of over-abstraction. However, there are indications that this position may improve, particularly as quarry working in the area, a significant abstractor of water, is reducing.
- 3.12 Within the operational catchment of the North Downs Chalk the focus is also on groundwater, although there is an important interaction with the River Mole via swallow holes at Mickleham which drain river water into the chalk. This is a Drinking Water Protected Area. It covers much of the Mole Gap from Polesden Lacey to Headley. The status or health of the groundwater was classified as generally Poor in 2009 and there has been no change since. The EA considered that the long term objective should be Good status. Here there is an issue of over-abstraction, although this does not impact on surface water. The strategy is to review abstraction licences and to modify permits to sustainable quantities.

4.0 DISCUSSION

- 4.1 Certain points emerge for a reading of the Thames River Basin Management Plan in relation to The Mole catchment. The first is that the objective of achieving Good status for the water bodies in the catchment by 2021 is a significant challenge that may well not be achieved. This is the case for both surface water and ground water, although the conditions pertaining to The Mole are not exceptional when compared across the Thames river basin,
- 4.2 Improvements will need to reverse years of poor management when river courses were modified in a short term response to flood alleviation or to accommodate development. Farming practices are responsible for much of the diffuse pollution to both surface and ground water in rural areas and changes to

agricultural practices will take time to implement. In a densely populated part of the country, the demand for water will continue to rise unless individuals and organisations take a more responsible approach to the use of water. The average person in the UK uses 150 litres of water a day in their home. If water used in growing and manufacturing the things people consume is included, that figure rises to 4,600 litres of water per person per day, over 60% of which comes from UK sources.

- 4.3 Although the Environment Agency is responsible for the production of the Management Plan, there are over 60 organisations involved in the management of waters in the Thames River Basin. They range from the Water Companies, whose investment plans probably have the most significant impact on water quality, to local volunteer groups undertaking habitat management in their local area. The approach to overall management under the WFD and the formation of Catchment Partnerships is a significant step forward. The first provides a holistic approach and the second offers the opportunity to bring together local people to work together under common objectives.
- 4.4 An important issue is the change to the river ecology as a result of the often unintended introduction of non-native species. Himalayan Balsam is well-known, choking the banks of our rivers and outcompeting native plants. There are other similar problem plants and animals that dramatically change the ecology of local rivers and these will be difficult or impossible to control.

5.0 FUTURE FUNDING AND FUNDING SCENARIOS

- 5.1 There will need to be significant, additional capital and revenue expenditure to meet WDF objectives. At a time of declining public expenditure it is not clear how successful the Catchment Partnership will be in bidding for funds. The most significant set of improvements would result from additional investment from the water companies. Their future investment plans and active participation in the Catchment Partnership remain uncertain. It is estimated that to achieve the Protected Area objectives and proposed water body objectives set out in the management plan and other plans covering the remainder of the country, an additional £16-£18bn will be required spread across the public and private sectors. This additional expenditure is unlikely to be available in the short term. Difficult decisions will need to be made about which priorities should be met first. To assist with the choices to be made various scenarios are set out in the management plan for the whole of the Thames Basin.

Scenario 1 assumes no new measures and the assessment is that this will result in significant deterioration in the quality of the water environment and will not comply with WFD requirements.

Scenario 2 aims to prevent deterioration and achieve Protected Area objectives up to 2027 at a cost across the Thames River Basin of £350m. This approach would not make much progress in improving the status of water bodies.

Scenario 3 aims to prevent deterioration, achieve Protected Area objectives and all technically feasible improvements towards Good status. There would be no affordability constraint. The cost is estimated to be £5,050m. This scenario will provide the best outcomes for the water environment but costs will be in excess of benefits and would go beyond the WFD requirements.

Scenario 4 aims to prevent deterioration, achieve Protected Area objectives and improvements in status where benefits exceed costs. There would be no affordability constraint. The cost is estimated to be £2,970m. It will result in significant improvement to the water environment, with benefits in excess of

costs. The scale of improvement is probably not technically feasible or affordable by 2021.

Scenario 5 is an illustration of potential progress towards scenario 4. It is not easy to understand but appears to be based on a striving towards scenario 4 but based on realistic assumptions about the availability of funding. It assumes for example that government funding will remain at its current level until 2016, including the WFD catchment restoration fund and flood and coastal risk management funding. Scenario 5 is seen as something between scenario 2 and 4.

- 5.2 Something of the philosophy of scenario 5 can already be seen in activities in Mole Valley associated with the River Mole. There are some encouraging signs. The projects along the Rye Brook, most of which have come forward as a result of community enthusiasm with support from the specialist agencies, provides an impetus for future work to join up these separate projects. This project demonstrates how it is possible to draw down funds, albeit small sums, from a range of agencies. The investigation of the Pipp Brook could be the beginning of new interest and investment, though it is early days. The combination of local government, conservation bodies and voluntary sector is developing well. There is also a more sensitive approach being taken by the relevant agencies to flood alleviation with opportunities to link habitat management to flood alleviation.

6.0 THE CONSULTATION

- 6.1 The EA's consultation on the management plan for the Thames Basin District is focused on a series of questions that consultees are requested to address. The questions, together with a suggested response, are set out below.

1. *Do you agree with the proposed changes to the river basin district and catchment, water body boundaries and artificial and heavily modified water body designation?*

Comment: adjustments have been made to various boundaries following the review of the 2009 Management Plan. In general these have little impact on The Mole but they have logic to them, reflecting better the character of the local environment and simplifying boundaries. In the longer term this will improve monitoring and management. The main issue is the boundaries to the Protected Areas which cover the ground water sources of the Lower Greensand and Chalk aquifers, plus the internationally important wildlife sites of the Mole Gap. The Nitrate Sensitive Area covers the whole of the catchment. There is an obvious logic to these selections and it is therefore proposed to agree the proposed changes.

Suggested Response: the boundary changes are acceptable

2. *Do you agree with the objectives proposed for water bodies and protected areas?*

Comment: all water bodies have an objective to prevent deterioration in their status and in some cases seek improvement. It is not always easy within the wealth of documentation accompanying the management plan to understand the objectives for individual catchments or parts of the catchment (operational catchment) and the time period to which they relate. One comment would be that this needs to be made clearer. However, for the operational catchment of the Lower Mole and Rythe the objective is to prevent a drop in status but to deliver measures that are likely to secure funding which will bring about improvements during the life of the plan. It is considered that this is probably

realistic. It will probably mean that significant parts of the operational catchment will remain unchanged but with improvement focused on key parts of the River Mole. The Reigate Lower Greensand Catchment and the North Downs Chalk Catchment are areas that have been identified as ones for improvement, reflecting their Protected Area status for ground water and wildlife sites. This is justified given their importance and that their current status is Poor.

Suggested Response: the objective for the River Mole Catchment, which is to prevent deterioration and seek opportunities for improvements, is agreed.

3. *Where flexibility exists, should the priority be maximising the number of water bodies with Good status or improving the worst water bodies?*

Comment: this is a question about priorities which is very difficult to answer in abstract. Priorities might be determined by the degree of co-operation with landowners or agencies and may therefore in practice be more opportunistic. Cost benefit calculations may be another basis for determining priorities, especially where public money is involved. Community supported initiatives may also justify a higher priority. The correct response might be to support initiatives that are likely to give impetus and public support for a programme of work whatever the condition of the particular water body.

Suggested Response: priority should be given to protected areas and to projects that have community support.

4. *In relation to measures needed to improve the water environment, do you agree the correct measures have been identified?*

Comment: the methodology used for each operational catchment is to identify the broad range of measures required to meet objectives. These might include the removal of barriers to fish, reducing pollution at source and controlling non-native species. As far as can be established, the correct range of measures has been identified based on the known challenges and problems associated with The Mole.

Suggested Response: it is agreed that the correct measures have been identified.

5. *Do you agree with the way the economic appraisal process had been done?*

Comment: The list of measures, once identified, are then monetised to produce a cost necessary to meet the water quality objective for each Operational Catchment. Similarly, a monetary value is attached to the benefits that would result from undertaking the measures. In the case of the Lower Mole Operational Catchment this produces a healthy benefit to cost ratio, providing a good basis on which to justify investment. In response to this question it is simply proposed to welcome the findings and to agree the process.

Suggested Response the economic appraisal process appears to have been correctly carried out.

6. *What measures can you deliver to help achieve the long term objectives?*

Comment: there is an acknowledgement that the EA cannot work towards objectives without support from a range of partners. This question asks what MVDC could contribute as one of the partners. There are a number of things that could be put forward. First, that MVDC is prepared to play its part as a member of the River Mole Catchment Partnership and contribute to the

discussions and decisions arising from it. Secondly, Council officers host regular meetings with EA staff and other parties to co-ordinate initiatives particularly in the Leatherhead area of the Catchment. It intended to continue to support this working group and to include on it a representative of the recently established volunteer group set up last year for the Leatherhead section of the River. Thirdly, MVDC has an important role to play as a riparian landowner. Land along The Mole from Leatherhead to Fetcham is of particular importance for leisure use and biodiversity. The sensitive management of that land to maintain public access at the same time as managing habitats and removing fallen trees and other obstructions and developing good relationships with adjacent landowners will be ongoing. Fourthly, MVDC will continue to support the Lower Mole Countryside Management Project. They have had a long term commitment to careful management of the river corridor from Mickleham to Ashted. Importantly, the Lower Mole Project is a member of the Catchment Partnership and provides opportunities for the community to become involved in volunteering. Fifthly, MVDC also supports the Gatwick Greenspace Project which works on the Upper Mole and has a number of initiatives running with volunteers in the Gatwick area. Sixthly, MVDC can support local groups by providing advice and a little funding when necessary to ensure that they work effectively and with enthusiasm. The Council did run a very successful River Mole Discovery Day for 3 or 4 years with EA and the Lower Mole Project. This raised awareness of the importance of the River and consideration could be given to resurrecting it. Funding would need to be provided to make it happen. The Council may consider applications for capital funding where it is appropriate for MVDC to be a funding partners. All applications would need to be considered alongside other funding priorities. Some funding opportunities may present themselves through the mechanism of Section 106 planning agreements or the Community Infrastructure Levy (CIL). Finally, in preparing the Local Plan and associated documents, the MVDC will need to consider alongside other policy matters, the degree to which it can support the objectives of the River Basin Management Plan.

Suggested Response: MVDC will provide appropriate support for the Catchment Management Plan through its support for a variety of on-going initiatives, participation in the Catchment Partnership and through the development of its planning policies..

7. *Do you have any comments on the scenarios and how they have been produced? How could scenario 5 be developed to present a preferred option for the impact assessment that will accompany the updated plans in autumn 2015?*

Comment: the scenarios are set in paragraph 5.1 of this report. Scenario 5 is presented in the management plan as the only realistic one; others appear to represent extremes of the spectrum and are included for comparison. Scenario 5 has no funding figure associated with it which is understandable since it is difficult to predict the fiscal environment from one financial year to another, let alone to the end of the 6 year period of the management plan and beyond to 2027. Nevertheless, it might have been helpful to set out in the management plan the likely cost of achieving WFD objectives as a measure of the extent to which current levels funding fall short of what is required.

It does appear that if the objectives of the management plan are to be met, the level of funding will have to be raised. At the very least the objective should be to meet the objectives for Protected Areas which are a vital part of the water environment in Mole Valley. Both surface waters and ground waters are an important part of the geography and geology of Mole Valley and it is therefore important that appropriate levels of investment are realised to meet WFD objectives. This is a message that should be included in MVDC's response to the EA.

Scenario 5 is a reflection of the realities of funding. As is implied in this report, partnerships that will be most successful in the bidding war for funding from DEFRA and other sources will be those that have an active and effective catchment partnership. Partnerships will need to put forward projects that are innovative, cost effective and clearly meet WFD objectives, where there is good working together and co-ordinated programmes between partners and across the sectors of environmental management, pollution control and flood protection for example. Good community support and involvement will also need to be demonstrated. The response to question 6 above indicates that MVDC does have an important role to play alongside other organisations and because of its close links to the community. That community places a very significant value on the health of the District's water bodies, including their landscape, amenity and leisure value.

Suggested Response: it is agreed that Scenario 5 provides a realistic way forward but it relies on the Catchment Partnership being adequately supported as it develops a programme of projects and partners, particularly the water companies, playing their part through realistic investment strategies.

7.0 FINANCIAL IMPLICATIONS

- 7.1 The financial implications are mentioned in the main part of the report, including references to the cost/benefit analysis that underpins the management plan. In terms of MVDC's financial commitment is concerned, the assumption is that the Council will maintain its revenue support for the sustainable management of land it manages adjacent to the water bodies and for the countryside management projects for example.
- 7.2 Opportunities may arise to participate in capital projects that arise from the work of the RMCP. These will be considered on their merits as and when they arise.

8.0 LEGAL IMPLICATIONS

There are no legal implications directly arising from this report..

9.0 OPTIONS

Option 1 – Approve the response to the consultation as contained in this report.

Members of the Executive may wish to supplement points contained in this report or stress particular points. Otherwise this option will enable the views of the Council to be forwarded and considered as part of the wider consultation

10.0 CORPORATE IMPLICATIONS

Monitoring Officer commentary - The Monitoring Officer confirms that all relevant legal implications have been taken into account.

S151 Officer commentary - The s151 Officer confirms that all relevant financial risks and implications have been considered in this report. There is a possibility of future capital investment. This will be considered and assessed in detail at the appropriate time, weighed against the Council's other priorities and viewed in the light of the Council's overall capital funding limits and commitments.

Risk Implications - This section should be completed for all reports and the Performance and Risk Management Officer should see a draft report as soon as possible. Please include any reputational risks in this section.

Equalities Implications - none.

Employment Issues - there are no employment issues arising from this report.

Sustainability Issues - the purpose of the Catchment Management Plan is to ensure the long term health of the river systems and water bodies throughout the Thames Basin region. The overall aim is to achieve 'good' status for all water bodies. This will involve a holistic approach which looks at their ecology, sources of pollution and the physical make up of the river channels. The Management Plan makes it clear that many organisations have an influence on the ability to achieve the objective and that this will only be possible by close working together.

Consultation - in this instance MVDC is the consultee along with various statutory and non statutory organisations and groups. This report will also be considered by the Scrutiny Committee

Communications - not applicable at this stage.

BACKGROUND PAPERS

None

