

Consultation Response – DEFRA TACKLING WATER POLLUTION FROM THE URBAN ENVIRONMENT (20.01.2013)

The following pages were uploaded to the DEFRA response webpages via “SurveyMonkey”

Q1. Do you agree with the proposed aims?

In principle, yes. However, EPUK has concerns about the practicalities of empowering local communities to lead clean up. The pilot projects are to be applauded but in reality, it would require local authorities to take on this role and as the consultation paper points out, they have asked for advice on their responsibilities & planning policies.

Q2. Do you broadly agree with our prioritisation of pollution sources? If you disagree, what should the priorities be? Please provide the evidence you have to support this view.

EPUK broadly agrees with the priorities but do not agree with the ranking of pesticides control. Some years ago, Monsanto organised a campaign with local authorities in the Midlands to encourage the use of non-residual pesticide/herbicides. This worked well and many local authorities changed their grounds maintenance policies; this approach could also be used as best practice with regard to other sectors.

Q3. Are you taking part in any initiatives where one of the principal objectives is reducing non-agricultural diffuse water pollution? If yes, please tell us briefly about the intended/realised outcomes, any barriers and costs/benefits.

Not applicable but EPUK would welcome initiatives to reduce pollution of the environment.

Q4. Are you aware of guidance published (e.g. by the Environment Agency or local authorities) that advises about urban diffuse water pollution? If so, how useful is it and how could it be improved?

Whilst EPUK is not aware of specific guidance, any publications on the subject would be welcomed. Such publications could be made available on both national and local government web sites giving indications of who should be contacted in the event of concern about pollution of watercourses. The EA's reporting a pollution incident web page is a good start

Q5. What would encourage you to contribute to a catchment-based initiative to tackle urban diffuse water pollution?

EPUK supports the philosophy of catchment based approach to improving river water quality. Amongst EPUK members there are local authority representatives who could be encouraged to support this successful approach.

Q6. Are the suggested actions the right ones to achieve our aims? If you think there are gaps, what other action(s) should be taken to resolve the problem? Do you have costs/benefits for the actions?

The proposed actions 1-10 appear to be relevant to the control of the problem. A number of the high priority pollution sources identified in the document, specifically misconnections from domestic and industrial premises are likely to require regulatory intervention. Given the

current cutbacks in local and national government spending, these sources are unlikely to be addressed.

We also note that local authority planners already contact the Environment Agency & water companies with regard to flooding and provision of storm water systems to reduce the impact on storm water sewers.

Q7. 'Polluter pays' and 'Payment for Ecosystem Services' (beneficiary pays) are approaches used to drive environmental improvement. Do you have evidence on the degree to which either approach is more cost effective for the control of urban diffuse water pollution?

No comment.

Further comments:

Noting the section of the consultation document and in particular "Actions being considered", we would add this response in relation to points 5 and 6.

We believe that this is an area which needs significant regulatory scrutiny in relation to regulatory approach. We wish to illustrate the apparent unclear and sometimes inconsistent approach to regulation in this area by the following example.

One of our members reports a situation where a minor water course passing through a piece of land owned by the local authority is fed by a surface water outfall, owned by the local water company. This surface water system was fed by an industrial estate comprising of around 20 units. The Environment Agency received reports that the watercourse had become contaminated by a significant amount of oil and the origins of the oil were unknown. The Environment Agency officer decided that, because the source of the pollution was unknown, the riparian land owner (ie the Council) should be liable for remedial works.

Legal arguments aside, there was no means by which the riparian landowner could put in place measures to prevent further, similar occurrences. This illustrates that the regulatory approach is apparently unable to address the causes of the problem.

Under Q2

Please assess these non-agricultural pollution sources, listed in the sources chapter, in terms of whether you think they should be targeted as high, medium or low priority.

	1 High	2 Medium	3 Low
Urban runoff	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Misconnections	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trading (light industrial) estates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
In-situ contaminated river bed sediment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mine waters (from abandoned metal mines)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Septic tanks & non-mains sewage systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contaminated land	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Abuse of drainage systems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Mine waters (coal)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rural road runoff	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Transient commercial car washing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Railways	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Airports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Pesticides and fertilisers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Discharges from boats and other craft	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other - if you suggested another source in your answer to the question above	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Under Q6

Please rank the suggested actions (with ranking=1 being your assessment of the most important action)

- Review the regulatory framework
- Establish roles and responsibilities
- Set out who has a role to play in making a difference
- Improve the evidence base
- Understand the physical ways in which urban diffuse water pollution could be controlled cost effectively
- Set out where there are other opportunities for multiple environmental benefits
- Build on the achievements from existing initiatives
- Use a monitored catchment(s) to understand how urban diffuse pollution impacts ecosystems
- Embed the work within River Basin Management Plans
- Understand which behavioural and community-based work is the most effective
- Other action if you have entered one in question above

Do you have costs/benefits evidence for any of the actions, including for any new suggested action(s)?

Closing Comment "Thank you for completing a response to the Defra consultation on urban diffuse water pollution. The consultation runs until Friday 8 February, in order to synchronise with and inform the Environment Agency's river basin planning consultations: <http://www.environment-agency.gov.uk/research/planning/33248.aspx>

Once completed, the responses to this urban diffuse water pollution consultation will be analysed and a summary published. The Government will use the responses to develop a strategy and plans to publish it in 2013".