

BHS Response to consultation on Diffuse Sources of Water Pollution from Agriculture

1. General

As hydrologists, members of BHS are only too aware of the individual nature of natural water catchments in their response to external drivers such as agricultural practices. We therefore applaud the recognition that the key to mitigating excessive diffuse pollution must be with good land management and the over-arching desire to improve the environments that we all inhabit. This Consultation document makes interesting reading with regard to the improvements that have been made in recent years through greater understanding of, and attention to, the causes of diffuse pollution (Chapters 2 and 3) although disappointing that the financial benefits are not more evident (<£300 million seems rather small). We look forward to seeing these improvements continue and will be interested in seeing the effect of CAP reform and in GAEC1 promotion and 'set-aside', particularly when applied to buffer strips along water courses.

2. Answers to the specific questions posed:

1. Yes
2. Policy No. 2 (WPZ + Scheme)
3. Yes, for pragmatic reasons of ease of administration BUT with adequate means to identify/administer exceptions
4. Yes, broadly (i.e. satisfactory from hydrological viewpoints: we are not competent to comment on agricultural aspects). We recognise that compliance with the WFD is a core competence of the Environment Agency but we cannot but remark that the issues raised in the draft WPZ Guidance would seem bound to put some additional strain on the resources of the Agency. No doubt this potential load will be reflected in their future staffing policies.