Email Consultation Response: Love Windermere Partnership

Dear Sirs,

We have pleasure in submitting our consultation response in respect of the above. This response is made of behalf of the Love Windermere Partnership.

Management of conflicts of interest

The Love Windermere Partnership comprises Cumbria Tourism, Environment Agency, Lake District Foundation, Lake District National Park Authority, National Farmers Union, National Trust, United Utilities plc and Westmorland and Furness Council.

As the Environment Agency and United Utilities plc have disclosed conflicts of interest in relation to this matter, they have not been involved or responsible for submitting this consultation response. Management of, and responsibility for this submission, has been taken by Nigel Wilkinson, MBE, Independent Chair of the Love Windermere Partnership Programme Board, with the opportunity for input given to the six other non-conflicted partners.

Background

The Love Windermere Partnership welcomes the proposals by United Utilities set out in their Bespoke Performance Commitment 'Wonderful Windermere' to reduce nutrient inputs into Windermere from non-water company assets.

The Love Windermere Partnership takes a science led, evidence-based approach to delivering projects that will improve the water quality in Windermere and its catchment for generations to come. In March 2025 we published a comprehensive report 'A Changing Windermere' under guidance from Lancaster University and based on a thorough synthesis of research to date conducted by the Freshwater Biological Association's 'State of Windermere' report. The report, 'A Changing Windermere, was reviewed by the UK Centre for Ecology and Hydrology and the Environment Agency Chief Scientist Group.

Alongside science, the Partnership is committed to delivering actions that meet the needs of local people and support the local economy. In 2023 a series of facilitated 'citizen panels' were commissioned to hear from local people, businesses and professionals on what they felt should be done to improve the future of water quality in the Windermere catchment.

The science is clear that nutrients, climate change and invasive species are the greatest threats to Windermere at present. The SAGIS Source Apportionment model demonstrates that nutrients enter Windermere via a range of sources including from water company operated assets including WwTW and Storm Overflows, but also from

privately operated sewage treatment and from land-management practices including agriculture, forestry and highways. To briefly explain these contributions, we know that alongside the sewage treatment assets operated by United Utilities there are a further 89 privately operated sewage treatment plants permitted under the Environmental Permitting Regulations and these combined have an equivalent discharge volume to that of Ambleside sewage treatment works. We also know that these plants in almost all cases do not include phosphorus removal technology and the annual average phosphorus concentration from the discharge of these plants is 6mg/l which is 12 times that of the current standard of treatment at Ambleside (0.5mg/l) and 24 times the standard that will be achieved following AMP8 investment, where treatment will reach a technically achievable limit of 0.25mg/l.

In addition, we estimate there to be a further 1,800 septic tanks in the Windermere catchment operating under General Binding Rules. These sites are not routinely inspected as they are outside the formal permitting regime. These sites also do not incorporate phosphorus removal through the treatment process.

'Wonderful Windermere' provides a fantastic opportunity to use the expertise of United Utilities in sewage treatment, to help address the pressures brought by a rugged, rural landscape, designated as both a UNESCO World Heritage Site and a National Park, which welcomes an estimated 7 million visitors each year, in addition to a resident population of between 14,500 –17,000.

Our understanding of how land-management affects water quality is still in developing but we know that nutrients are entering water within the catchment via nutrient laden soils washing off land, via excess surface water entering combined sewer overflows and via some farm management practices such as livestock poaching of water courses, management of dirty yard water and in some cases fertiliser/manure application.

Responses to the specific questions asked are:

1. **The Wonderful Windermere performance commitment identifies the following sources of phosphorus to reduce nutrient input: Private WwTWs, Domestic Septic Tanks, Catchment farmland, and 'Other' catchment land.**

- **Are there any specific interventions you wish to be considered to support nutrient reduction from these sources?**
- **Alternatively, are you aware of any additional sources of nutrient inputs that you think should be included?**

The Love Windermere Partnership, through the science, data and evidence captured over decades and compiled within the report 'A Changing Windermere' agree that these are the primary sources of nutrient input to Windermere.

A sub-catchment nutrient budget, as operated in places such as Lake Champlain, Canada and Loch Neagh, Northern Ireland, could be used to identify and prioritise locations for interventions.

The Partnership believes that within 'other' catchment land, interventions that reduce surface water run-off could be considered under this bespoke performance commitment. We are keen to learn from projects such as the Cumbria Innovative Flood Resilience project at Grasmere to see how Natural Flood Management interventions can deliver water quality outcomes and believe that the bespoke performance commitment could provide additionality to 'flood risk management' projects to deliver additional or secondary water quality outcomes such as Phosphorus removal.

'Other' catchment land could also include highways and forestry. The sampling of chemicals known to impact water quality from such assets would, where possible, be welcomed, including nitrogen, ammonium, heavy metals, microplastics and hydrocarbons.

While the Partnership very much support the principle that Wonderful Windermere should not be used to bring sites into compliance, we feel that wherever possible and provided a robust programme of work is in place to bring a site back into compliance, the Wonderful Windermere elements of additionality could and should be 'twin tracked'. This would further enable blended funding options.

Whilst recognising the limitations on the scope of the bespoke performance commitment with the focus being on phosphorus reduction, any opportunities to measure other key nutrients directly impacting water quality in the Windermere catchment would be welcomed. Section 7.1.1 Farmscoper Methodology at Farm Level, references Nitrate Vulnerable Zones for assessing the compliance of agricultural assets., sampling and/or modelling to include nitrates, with interventions to potentially reduce these, would be beneficial.

2. **United Utilities has put forward a comprehensive sampling regime (Table 1 in the document) as part of the methodology to ensure phosphorus loads are representative. Do you think the proposed sampling regime is suitable for each source of phosphorus?**

We are satisfied with the sampling regime proposed in Table 1 of the methodology. We are confident that working through the expertise contained across public, private and third sector organisations represented in the sewage and land-use workstreams of Love Windermere, the regime can be monitored in practice and reviewed with any changes agreed with the Environment Agency.

3. **Verified modelled values will be used to claim phosphorus reduction outputs for catchment interventions and for interventions where sampling is**

prevented or not possible. Do you have any comments regarding the proposed modelled values?

We are satisfied that the proposed modelled values, and the reasons for using a modelled approach, are appropriate. Love Windermere Partners have extensive practical experience of working in this catchment and agree that the reasons given for not taking a sample accurately reflect the observed scenarios in this catchment and when assessing private sewage treatment ,including septic tanks generally.

We are satisfied with the proposed modelled values that are based on the same values used by the Love Windermere Partnership in designing and delivering our interventions to reduce nutrient inputs to Windermere.

Modelled values could potentially be improved with investment in a sub-catchment nutrient budget and the Love Windermere Partnership is exploring funding options for this work. If a nutrient budget is delivered for Windermere, Love Windermere Partnership would explore how this methodology could be updated in light of more detailed information.

Consideration should be given to a minor amendment to the methodology, specifically relating to utilising modelled data for agricultural assets. Whilst 'details of the sampling required will be agreed as necessary with EA and the Love Windermere governance group' is referenced in Table 1 on page 11, no similar reference to sampling is provided in Section 7, Agricultural and land-based interventions.

Monitoring should be prioritised where possible. Each agricultural asset will be different and there may well be opportunities to sample at specific points, pre and post intervention. Where possible, sampling should be the preferred option and where possible, completed in conjunction with modelling. Where sampling is not possible, the Farmscoper methodology in section 7 of the performance commitment would then be used.

The Partnership would suggest that the Decision Support Tree in figure 2 in specific relation to catchment agriculture is changed from "Check if the landowners is engaged and the agricultural land-assets is currently compliant with legal and regulatory requirements" to "Check if the landowner is engaged and the agricultural land/assets is currently compliant or is progressing to compliance with legal and regulatory requirements prior to the completion of any proposed additionality intervention". This recognises the continuing work needed with the land use sector to ensure adherence with compliance and will ensure United Utilities can make meaningful contribution to the agricultural sector in the catchment whilst others work to support compliance.

4. **Throughout the performance commitment, the governance group will play a key part in having oversight and signing off all interventions as part of this**

performance commitment. Do you have any recommendations for how this group should be used throughout the performance commitment?

The governance offered through the Love Windermere Partnership provides robust accountability for the delivery of 'Wonderful Windermere' by a range of public, private and third sector organisations. Love Windermere Partners have extensive experience and expertise of assessing water quality in this and other catchments, working with private sewage operators and land managers and in regulation. Working in collaboration to review these interventions and the methodology as projects are delivered provides a robust mechanism to ensure Phosphorus savings are achieved and the methodology, reporting and governance are reviewed as 'Wonderful Windermere' is delivered.

We believe this bespoke performance commitment may enable match funding opportunities and/or projects that complement this work. For example, alignment with flood risk management investment where projects deliver multiple outcomes.

We are aware that South Cumbria Rivers Trust, one of the Love Windermere Partners, has made separate representations to this consultation regarding ongoing governance review. We would welcome the opportunity to further consider the detailed governance arrangements methodology, which have not been possible due to the limited time available in which to make this consultation response.

Conclusion

The Love Windermere Partnership welcome this innovative, collaborative approach to positive interventions to improve water quality and look forward to reviewing progress as the bespoke performance commitment progresses.

Yours faithfully.