

E-Consultation Response: South Cumbria Rivers Trust

Which organisation are you representing?

South Cumbria Rivers Trust

Q1: 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?

SCRT would welcome the opportunity to sample and measure other key nutrients directly impacting water quality in the Windermere catchment. Section 7.1.1 Farmscoper Methodology at Farm Level, references Nitrate Vulnerable Zones for assessing the compliance of agricultural assets. Where possible, sampling and/or modelling should include nitrates, with interventions attempting to reduce these where possible. 'Other' catchment land could include highways and forestry. Sampling of chemicals known to impact water quality from such assets should be sampled where possible, including nitrogen, ammonium, heavy metals, microplastics and hydrocarbons.

Q2: 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?

No response.

Q3: 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?

SCRT would suggest a minor amendment to the methodology, specifically relating to utilising modelled data for agricultural assets. Where it does reference 'details of the sampling required will be agreed as necessary with EA and the Love Windermere governance group' in Table 1 on page 11, reference to sampling is not 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 WW PC would then be used.

Q4: 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?

SCRT would suggest amendments in the methodology to include governance review at relevant stages throughout the WW PC. Annual Board review could coincide with the data review deadline before the 1st September annually. Board Governance review would allow Love Windermere partners to assess the decision support tree structure to ensure robust and effective delivery. We would also suggest workstream governance review at relevant stages throughout the year, especially when quantifying possible interventions. Current methodology detail is limited and whilst we are supportive of the PC, we would suggest mention to specific review dates to ensure transparent appraisal and evaluation of interventions and the decision-making process.