# The London Resort Development Consent Order

BC080001

## Environmental Statement
## **Volume 2: Appendices**

# Appendix 12.8 – Water Framework Directive (Screening) Assessment: River Ebbsfleet

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December 2020

Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009
Regulation 5(2)(a)
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Regulation 12(1)

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# Revisions

| Revision | Description | Issued by | Date | Approved by |
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# Executive Summary

This Water Framework Directive (WFD; Screening) Assessment has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of London Resort Company Holdings Limited in relation to the proposed development of the 'London Resort' scheme. The proposed development includes land on the Swanscombe Peninsula, and the Ebbsfleet Valley, on the south side of the River Thames (referred to as 'the Kent Project Site'), and land to the east of the A1089 Ferry Road and the Tilbury Ferry Terminal (referred to as 'the Essex Project Site'). Collectively these two sites form the 'the Project Site' which is to be the subject of a Development Consent Order (DCO).

The Water Framework was adopted by the European Union (EU) and came into force in December 2000. The WFD establishes a legislative framework for the protection of surface waters and groundwater throughout the EU and requires all-natural waterbodies to achieve good 'status' by 2027. Of pertinence to the Project Site, the River Ebbsfleet which flows south to north from the southern boundary of the Kent Project Site, downstream of the A2 dual carriageway and continues north of Ebbsfleet International Station where it is culverted under existing development at Northfleet before discharging into the tidal River Thames.

The River Ebbsfleet (WFD Waterbody GB106040024190) was previously identified as a Heavily Modified Waterbody (HMWB) under the WFD until 2015, but was removed following progression of the second cycle River Bain Management Plan for the Thames District. However, despite the River Ebbsfleet being no longer subject to assessment or management under the WFD, an environmental impact assessment should still have due regard to a 'no deterioration assessment' for the River Ebbsfleet. This WFD screening assessment, therefore, considers the impact of the Proposed Development on the River Ebbsfleet and associated aquatic communities in the context of the WFD and specifically considers potential impacts to biological elements, including fish and an aquatic invertebrate community, in addition to the physical characteristics of the watercourse.

To establish a detailed baseline for the River Ebbsfleet an approximate 2km stretch was surveyed in accordance with standard River Corridor Survey (RCS) and River Habitat Survey[1] (RHS) methodology in addition to sampling of the aquatic invertebrate community to assess the current biological water quality of the watercourse. The River Ebbsfleet comprises a realigned/straightened and heavily modified watercourse, relatively uniform in appearance and structure with limited in channel diversity. Following sampling of the aquatic invertebrate community, biotic scores recorded for the Rivers Ebbsfleet are indicative of moderate water quality. In addition, historical fish surveys undertaken by Colclough and Coates Aquatic Consultants identified no evidence of active recruitment to the fishery, such that a population present within the River Ebbsfleet is not self-sustaining in the long-term.

There is the potential for indirect impacts to the River Ebbsfleet associated with a deterioration in water quality from pollution incidents and contaminated surface runoff in addition to changes

[1] River Habitat Survey in Britain and Ireland, Field Survey Guidance Manual: 2003 Version, Environment Agency

in the hydrological regime. Inherent within the masterplan design however is the implementation of a sustainable drainage strategy throughout the Project Site to manage surface water flows and minimise the risk of pollution to the water environment. Furthermore, development will be implemented in accordance with an Ecological Mitigation and Management Framework (EMMF) and Construction Environmental Management Plan (CEMP) secured by the DCO.

Subject to implementation of mitigation measures described within this report and supporting appendices to an Environmental Statement (ES) it is considered that the current status of the River Ebbsfleet can be maintained with no deterioration in biological water quality. Development proposals will also not result in physical modification to the watercourse that would preclude future enhancement and conservation management of this waterbody to increase morphological diversity and/or return it to a more natural state.

Although the River Ebbsfleet has been 'de-classified' and is no longer subject to assessment or management under the WFD with no subsequent classification of its current ecological potential, it is considered that development of the Project Site will not preclude achievement of those WFD objectives previously established.

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# Chapter One ◆ INTRODUCTION

1.1 This Water Framework Directive (WFD; Screening) Assessment has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of London Resort Company Holdings Limited in relation to the proposed development of the 'London Resort' scheme. The proposed development includes land on the Swanscombe Peninsula, and the Ebbsfleet Valley, on the south side of the River Thames (referred to as 'the Kent Project Site'), and land to the east of the A1089 Ferry Road and the Tilbury Ferry Terminal (referred to as 'the Essex Project Site'). Collectively these two sites form the 'the Project Site' which is to be the subject of a Development Consent Order (DCO).

1.2 The River Ebbsfleet flows south to north from the southern boundary of the Kent Project Site, downstream of the A2 dual carriageway and continues north of Ebbsfleet International Station where it is culverted under existing development at Northfleet before discharging into the tidal River Thames.

1.3 Following consultation with the Environment Agency (EA) they requested that despite the River Ebbsfleet being no longer subject to assessment or management under the WFD, an environmental impact assessment should still have due regard to a 'no deterioration assessment' for the River Ebbsfleet, particularly as this watercourse discharges into the River Thames, which will be the subject of a separate WFD assessment.

1.4 As such this WFD screening assessment provides an assessment of potential effects arising upon the River Ebbsfleet and associated aquatic communities with due regard to objectives of the WFD. In so doing, this report, provided at Appendix 12.8, to an Environmental Statement (ES) (Document reference 6.2.12.8) considers the impact of the Proposed Development on the River Ebbsfleet.

1.5 EDP is an independent environmental planning consultancy with offices in Cirencester, Cardiff, Shrewsbury and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp uk.co.uk).

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# Chapter Two ◆ LEGISLATIVE CONTEXT

2.1 The WFD was adopted by the European Union (EU) and came into force in December 2000. The WFD is transposed into law in England and Wales by The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (the 2017 Regulations). The WFD establishes a legislative framework for the protection of surface waters (including rivers, lakes, transitional waters, and coastal waters) and groundwater throughout the EU. The WFD requires all-natural waterbodies to achieve good 'status' by 2027; the status of a waterbody being a function of its chemical, ecological and physical (hydromorphological) condition based on a number of 'supporting elements'.

2.2 These waterbodies are collated into 'river basin district's' for which River Basin Management Plans (RBMP) are developed to cover a period of six years and set out the current status of each watercourse, the predicted status for the end of the RBMP cycle, as well as the actions and objectives required to ensure waterbodies achieve good status. However, artificial and heavily modified waterbodies may be prevented from reaching good status due to the modifications necessary to maintain their function. They are, however, required to achieve good ecological potential (GEP).

2.3 Ecological status or ecological potential is defined by the overall health or condition of the watercourse. This is assigned on a scale of High, Good, Moderate, Poor or Bad, and on the basis of four classification elements as detailed below:

- Biological – fish, invertebrates or alga;
- Physico-chemical – dissolved oxygen, phosphorus and ammonia;
- Specific pollutants – assessed according to concentrations of specific pollutants; and
- Hydromorphology – water flow, sediment composition and movement, continuity, and structure of the habitat against reference conditions. Used to determine a waterbody of high status.

2.4 New activities and schemes that affect the water environment and associated biological, hydromorphological, physico-chemical and/or chemical quality elements must consider whether there is the potential to:

- Cause a deterioration of a water body from its current status or potential; and/or
- Prevent future attainment of good status or potential where not already achieved.

2.5 Where new developments that have the potential to impact on current or predicted WFD status are required to assess their compliance against the WFD objectives of the potentially affected water bodies.

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# Chapter Three ◆ RIVER EBBSFLEET

3.1 The River Ebbsfleet is located within the Thames River basin district and as previously stated flows south to north from the southern boundary of the Kent Project Site, downstream of the A2 dual carriageway and continues north of Ebbsfleet International Station where it is culverted under existing development at Northfleet before discharging into the tidal River Thames.

3.2 The River Ebbsfleet is located within the Thames River basin district, the first cycle RBMP[2] (2009) for which identifies the objectives and measures required to improve the status of surface and ground waterbodies within the catchment. The River Ebbsfleet (WFD Waterbody GB106040024190) was previously identified as a Heavily Modified Waterbody (HMWB) under the WFD until 2015. As such, classification of the waterbody was determined by the following mitigation actions, required to be in place in order to achieve good potential:

- Retain marginal aquatic and riparian habitats; and
- Increase in-channel morphological diversity.

3.3 During 2009, the River Ebbsfleet was considered to be at 'moderate ecological' potential with an assessment of biological, physio-chemical and hydromorphological elements based on expert judgement. Justification for the waterbody not achieving 'good' potential by 2015 is attributed to being 'disproportionately expensive' and 'technically unfeasible' as further detailed at Annex B and Annex E of the Thames River Basin RBMP, 2009[3]. A summary of the 2009 Cycle 1 assessment is provided at Annex 1.0.

3.4 Following progression of the second cycle RBMP (2015-2021), however, the River Ebbsfleet has been removed from the RBMP and is no longer subject to assessment or management under the WFD with no subsequent classification of its current ecological potential. For those waterbodies removed following progression of the second cycle RMBP, this was typically due to the small size of the waterbody and/or did not meet relevant DEFRA and WFD guidelines.

3.5 Nevertheless, and following consultation with the Environment Agency, although no formal WFD screening assessment of the River Ebbsfleet is required, an environmental impact assessment should still have due regard to a 'no deterioration assessment' for the waterbody. Of further note, the River Ebbsfleet discharges into the River Thames, which

[2] Environment Agency (2009). River Basin Management Plan, Thames River Basin District. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf [Accessed on 15 December 2020]

[3] Environment Agency (2009). River Basin Management Plan, Thames River Basin District. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf [Accessed on 15 December 2020]

will be the subject of a formal WFD assessment. As such this report considers the impact of the Proposed Development on the River Ebbsfleet.

3.6 In brief, deterioration of the status of a waterbody is defined as a fall by one class of any element of the "classification elements" (where assessed) even if the fall does not result in a fall of the classification of the water body as a whole[4]. During 2009, the River Ebbsfleet was considered to be at 'moderate ecological' potential with an assessment of biological, physio-chemical and hydromorphological elements based on expert judgement such that a fall in class from this status would be considered a deterioration. Furthermore, and in accordance with the requirements of the WFD, development should not preclude the future achievement of good ecological potential within the River Ebbsfleet, defined by the mitigation measures established for that waterbody.

[4] Environment Agency, 2013. Water Framework Directive – no deterioration. Position Paper 200_13. Issued 01/05/2013

# Chapter Four ◆ ECOLOGY BASELINE

4.1 To establish a detailed baseline for the River Ebbsfleet and associated riparian habitats, an approximate 2km stretch from its upstream extent at Springhead Garden Centre (OSGR TQ 617 727) to its downstream extent north of Ebbsfleet International Station (OSGR TQ 614 744), was surveyed in accordance with standard River Corridor Survey (RCS) and River Habitat Survey[6] (RHS) methodology on 18 May 2020. This was in addition to sampling of the aquatic invertebrate community at four locations along the length of the Rivers Ebbsfleet during May and September 2020 to assess the current biological water quality of the watercourse, capturing the spring and autumn months in accordance with best practise guidance[7].

4.2 Full details of the methodologies adopted, and baseline results are provided within the Ecological Baseline Report (Document refence 6.2.12.1, Annex EDP 2; and Annex EDP 11) to be submitted with an Environmental Statement (ES) and planning application.

4.3 In brief, the River Ebbsfleet comprises a realigned/straightened and heavily modified watercourse, relatively uniform in appearance and structure with limited in channel diversity, as evidenced by the findings of RCS and RHS (Document refence 6.2.12.1, Annex EDP 2). Following sampling of the aquatic invertebrate community, biotic scores recorded for the Rivers Ebbsfleet are indicative of moderate water quality and subject to background pollution levels arising from surface water runoff and urban discharges from surrounding development. As previously stated, the watercourse is heavily modified and characterised by a straightened/realigned channel with limited morphological and hydromorphological diversity, which is further likely to suppress a diverse aquatic aquatic invertebrate community.

4.4 A fish survey of the River Ebbsfleet was previously undertaken by Coclough and Coates Aquatic Consultants in 2015 (Document refence 6.2.12.1, Annex EDP 33 during which the River Ebbsfleet from Springhead Nurseries downstream to the crossing point of the North Kent railway line at Northfleet was subject to a visual survey whilst electrofishing and fyke nets were deployed at two locations close to the A226 Thames Way/A2260 junction.

4.5 Modest populations of mature roach (*Rutilus rutilus*) and perch (*Purca fluviatilis*) were captured during electrofishing and fyke netting operations. There was no evidence of active recruitment to either of these populations. Three-spined stickleback (*Gasterosteus aculestus*) were common or abundant at all sites fished and were observed at a number not fished. Nine-spine sticklebacks (*Pungitius pungitius*) were also found in both electrofishing and fyke netting operations.

[6] River Habitat Survey in Britain and Ireland, Field Survey Guidance Manual: 2003 Version, Environment Agency

[7] Murray-Bligh, J.A.D., Furse, M.T., Jones, F.H., Gunn, R.J.M, Dines, R.A. and Wright, J.F. (1997) *Procedure for collecting and analysing macroinvertebrate samples for RIVPACS*. Joint publication by the Institute of Freshwater Ecology and the Environment Agency, 162 pp.

4.6 The fish surveys undertaken by Colclough and Coates Aquatic Consultants identified no evidence of active recruitment to the fishery, such that a population present within the River Ebbsfleet is not self-sustaining in the long-term. It was further noted that suitable habitat for a notable fish population within the River Ebbsfleet is extremely limited, given the heavily modified nature of the watercourse with limited in channel habitat diversity of value to a fish population and little variation in water flow, water depth and substrate. Of further note, the River Ebbsfleet is culverted upstream of the Project Site and further culverted for circa 560m (as the crow flies) under Northfleet before it discharges into the River Thames; such structures are a significant barrier to the dispersal of a fish assemblage.

# Chapter Five ◆ ASSESSMENT OF POTENTIAL EFFECTS

5.1 A no deterioration assessment of the River Ebbsfleet as a consequence of the development proposals has been undertaken by considering the likely impacts on relevant classification elements. With reference to the Thames River Basin District RMBP, this assessment considers biological elements, including fish and an aquatic invertebrate community, in addition to the physical characteristics of the watercourse recorded during survey effort.

5.2 The assessment has also had due regard to those mitigation measures which define ecological potential of the River Ebbsfleet as identified by the Thames River Basin District RBMP, 2009 (extract provided at Annex 1.0).

5.3 The assessment of likely effects considers those construction activities related to the Project Site, as well as those related to its operation. In the absence of mitigation, the potential effects of the proposed development during the construction and operation phase on the River Ebbsfleet and associated aquatic communities are summarised below:

- Increased dust, noise, vibration, visual and light disturbance;
- Hydrological effects including changes to water quality/quantity;
- Pollution/contamination incidents;
- Recreational impacts including trampling, littering; and
- Introduction/spread of invasive species.

5.4 The River Ebbsfleet and associated riparian habitats largely lies outside the construction/development footprint of the Project Site such that there no direct impacts associated with damage or loss of bankside habitat and aquatic features. However, the upstream extent of the River Ebbsfleet flows adjacent to the proposed development footprint for highway improvement works to the A2 associated with the development scheme. As such, there is the potential for indirect impacts to the River Ebbsfleet associated with a deterioration in water quality and increase in suspended solids as a result of the discharge of contaminated surface water run-off from development during the construction and operation phase as listed at paragraph 5.3. Pollution incidents could also arise as a result of leaks and spills from construction activities, resulting in the introduction of hydrocarbons and other contaminants from demolition activities and site plant.

5.5 Such impacts would give rise to negative effects on a freshwater ecosystem more generally, with potential for fish kills to occur, reduced diversity of a macroinvertebrate community and changes in the composition of a plant community in addition to potential

loss of microhabitats for fish and aquatic invertebrates following an increase in sediment disposition. Such impacts are considered to be of minor magnitude and extent (i.e. minor shift in baseline conditions, particularly given the depauperate communities of fish and aquatic invertebrates recorded). This is in addition to potential changes in the hydrological regime through an increase in surface water run-off from new development with such effects considered permanent and of moderate magnitude and extent at the local level.

5.6 Inherent within the masterplan design however is the implementation of a sustainable drainage strategy throughout the Project Site to manage surface water flows and minimise the risk of pollution to the water environment. In particular, appropriate sustainable urban drainage systems (SuDS) will be incorporated as part of the A2 works to treat and convey runoff from the new access road, before discharge via infiltration if appropriate or to the existing highways drainage or River Ebbsfleet as outline in Chapter 17 – Water Resources and Flood Risk (Document reference 6.1.17). Furthermore, development will be implemented in accordance with an EMMF (Document refence 6.2.12.3) secured by the DCO which establishes the strategy for the enhancement of retained wetland habitats across the Project Site, combined with the creation of new on-site wetland habitat in compensation for proposed loss. This includes creation of new drainage ponds and attenuation features adjacent to the floodplain of the River Ebbsfleet, comprising a sustainable drainage strategy for the A2 highway, which will be subject to a wetland planting scheme.

5.7 Of further pertinence, construction of the proposed development will be undertaken in accordance with a Construction and Environmental Management Plan

5.8 Of further pertinence, the Principal Contractor for the Proposed Development will produce a Construction Environmental Management Plan (CEMP) to include mitigation measures to protect the environment during both the demolition and construction phases. The CEMP will be secured by a requirement in the draft DCO. An Outline CEMP has been prepared in support of the DCO application (Document Reference 6.2.3.2). The CEMP will provide details pertaining to ecological protection zones (EPZ) sensitive working practices, pollution control measures, dust suppression measures and materials storage to reduce risk of pollution events and contaminated surface water runoff, to ensure that detrimental effects on nearby watercourse as a result of surface run off, spillage and pollution arising throughout the construction phases are avoided. Further details are provided within Table 5-1 below and within the Outline CEMP (Document reference 6.2.3.2)

**Table 5-1: Construction and Operational Effects on Classification Elements of the River Ebbsfleet.**

| Classification Elements Considered | Current Classification (2009) | Nature of Impact (identified within Chapter 12 of the ES) | Impact Magnitude and Significance | Summary of Avoidance/Mitigation | Effect of Proposed Development |
|---|---|---|---|---|---|
| Aquatic Invertebrate Fish and Macrophytes | None | Noise and vibration. | Temporary, minor magnitude and extent at local level. | Implementation of a CEMP detailing EPZs, sensitive working practices, dust suppression measures and materials storage to reduce risk of pollution events (Document Reference 6.2.3.2). New landscape planting during operation to screen habitat from road, delivered through the EMMF (Document reference 6.2.12.). | No deterioration at waterbody level. |
| | | Changes in air quality during construction and operation from dust, construction/operational waste and pollutants, and exhaust emissions. | Temporary, reversible, minor magnitude and extent at local level. | Implementation of a CEMP detailing EPZs, sensitive working practices, dust suppression measures, appropriate disposal of pollutants and materials storage to reduce risk of pollution events (Document Reference 6.2.3.2). | No deterioration at waterbody level. |

| Classification Elements Considered | Current Classification (2009) | Nature of Impact (identified within Chapter 12 of the ES) | Impact Magnitude and Significance | Summary of Avoidance/Mitigation | Effect of Proposed Development |
|---|---|---|---|---|---|
| | | Damage to habitats and aquatic communities through increased recreational use resulting in trampling, littering etc and inappropriate land management practises and chemical pollution. | Permanent, reversible, moderate magnitude and extent at local level. | Installation of adequate litter disposal along defined routes, regular litter removal during maintenance, delivered through a Landscape Strategy (Document reference: 6.2.11.7) and EMMF (Document reference 6.2.12.). Development of sustainable drainage strategy to avoid road run-off passing directly into waterbodies. | No deterioration at waterbody level. |
| | | Changes to hydrological regime and changes in water quality/quantity. | Temporary (potentially permanent), moderate magnitude and extent at local level. | Prevention of hydrological impacts through adherence to an appropriate Surface Water Management Strategy, as outlined within Chapter 17 – Water Resources and Flood Risk of the ES. | No deterioration at waterbody level. |
| | | Introduction or proliferation of Invasive Non-native Species (INNS). | Temporary, reversible, minor magnitude and extent at district level. | Implementation of a Non-native Invasive Plant Species Mitigation Strategy included within the EMMF (Document reference 6.2.12) – including details on control/eradication of existing populations of non-native species.<br>Implementation of CEMP detailing measures to prevent spread of INNS and INNS impacted soils. | No deterioration at waterbody level. |

| Classification Elements Considered | Current Classification (2009) | Nature of Impact (identified within Chapter 12 of the ES) | Impact Magnitude and Significance | Summary of Avoidance/Mitigation | Effect of Proposed Development |
|---|---|---|---|---|---|
| Supporting Conditions (Quantity and Flow Dynamics) | Good | Changes to hydrological regime. | Permanent, moderate magnitude and extent at local level. | Prevention of hydrological impacts through adherence to an appropriate Surface Water Management Strategy, as outlined within Chapter 17 of the ES – Water Resources and Flood Risk. | No deterioration at waterbody level. |
| Mitigation Measures (Maintain marginal and aquatic riparian habitats) | Moderate | No direct effects. Marginal and riparian habitats will be retained. | No change. | Creation of new wetlands habitats adjacent to the A2 highway to be delivered alongside a sustainable drainage strategy. | No deterioration at waterbody level. Potential for localised improvements in water quality of River Ebbsfleet. |
| | | Damage to habitats and aquatic communities through increased recreational use resulting in trampling, littering etc and inappropriate land management practises. | Permanent, reversible, moderate magnitude and extent at local level. | Installation of adequate litter disposal along defined routes, regular litter removal during maintenance, delivered through a Landscape Strategy (Document reference: 6.2.11.7) and EMMF (Document reference 6.2.12). | No deterioration at waterbody level. |

| Classification Elements Considered | Current Classification (2009) | Nature of Impact (identified within Chapter 12 of the ES) | Impact Magnitude and Significance | Summary of Avoidance/Mitigation | Effect of Proposed Development |
|---|---|---|---|---|---|
| Mitigation Measures (Increase in channel morphologic al diversity) | Moderate | Changes to hydrological regime. | Temporary (potential permanent), moderate magnitude and extent at local level. | Prevention of hydrological impacts through adherence to an appropriate Surface Water Management Strategy, as outlined within Chapter 17 of the ES – Water Resources and Flood Risk. | No deterioration at waterbody level. |

# Chapter Six ◆ SUMMARY AND CONCLUSIONS

6.1 An assessment of effects as documented within the ES to be submitted with the DCO application has identified a potential for localised effects on the River Ebbsfleet following development of the Project Site. However, subject to implementation of mitigation measures identified above and detailed within the Chapter 12 of the ES (paragraphs 12.151-12.175) and supporting appendices, including the EMMF (Document reference 6.2.12.3), to be secured by a requirement in the draft DCO, it is considered that the status of the River Ebbsfleet (defined by biological, physio-chemical and hydromorphological elements) as previously reported within the first cycle RMBP (2009) can be maintained with no deterioration in biological water quality and hence reported surface waterbody status of the river. In accordance with those WFD mitigation measures established for the River Ebbsfleet, marginal aquatic and riparian habitats will be retained with no loss arising as a result of development proposals. Development proposals will also not result in physical modification to the watercourse that would preclude future enhancement and conservation management of this waterbody to increase morphological diversity and/or return it to a more natural state.

6.2 Although the River Ebbsfleet has been 'de-classified' and is no longer subject to assessment or management under the WFD with no subsequent classification of its current ecological potential, it is considered that development of the Project Site will not preclude achievement of those WFD objectives previously established.

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# Annex

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# Annex 1.0 ◆ RIVER EBBSFLEET WATERBODY STATUS OBJETIVES

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| | | |
|---|---|---|
| **Waterbody Category and Map Code.:** | River - R51 | **Surveillance site:** No |
| **Waterbody ID and Name:** | GB106040024190 | Ebbsfleet |
| **National Grid Reference:** | TQ 61551 74252 | |
| **Current Overall Potential** | Moderate | |
| **Status Objective (Overall):** | Good by 2027 | |
| **Status Objective(s):** | Good Ecological Potential by 2027 | |
| **Justification if overall objective is not good status by 2015:** | Disproportionately expensive, Technically infeasible | |
| **Protected Area Designation:** | Not Designated | |
| **SSSI (Non-N2K) related:** | No | |
| **Hydromorphological Designation:** | Heavily Modified | |
| **Reason for Designation:** | Flood Protection | |
| **Downstream Waterbody ID:** | GB530603911400 | |

**Note: Current Status and Status Objectives for this water body are based on Expert Judgement**

## Ecological Potential

| | |
|---|---|
| **Current Status (and certainty that status is less than good)** | Moderate |

## Supporting conditions

| Element | Current status (and certainty of less than good) | Predicted Status by 2015 | Justification for not achieving good status by 2015 |
|---|---|---|---|
| Quantity and Dynamics of Flow | Supports Good | Supports Good | |

## Ecological Potential Assessment

| Element | Current status | Predicted Status by 2015 | Justification for not achieving good status by 2015 |
|---|---|---|---|
| Mitigation Measures Assessment | Moderate | Moderate | Technically infeasible (M3a) |

## Mitigation Measures that have defined Ecological Potential

| Mitigation Measure | Status |
|---|---|
| Retain marginal aquatic and riparian habitats (channel alteration) | **Not In Place** |
| Increase in-channel morphological diversity | **Not In Place** |

## Chemical Status

| | |
|---|---|
| **Current Status (and certainty that status is less than good)** | Does not require assessment |