

## REPORT OF THE CONSERVATION POLICY OFFICER

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### **SUBJECT: CONSULTATION ON A WATER STRATEGY FOR WALES**

#### Purpose of the report

To agree a National Parks Wales response to Welsh Government's consultation on a Water Strategy for Wales.

#### Background

The Welsh Government is developing a more integrated approach to managing water as part of its wider natural resource management approach and has issued a draft water strategy for comment.

The overall aim of the strategy is to ensure that Wales' water resource is resilient, sustainable and managed to bring benefits to Wales and its people. The draft strategy sets out the current state of water resources in Wales, principles of management, challenges and priorities for action.

Officers' responses to the consultation questions are attached at Annex 1 to this report. Officers have consulted with colleagues in Brecon Beacons National Park Authority and Snowdonia National Park Authority and it is proposed to send the response as a submission from National Parks Wales. National Park Authorities may also wish to submit individual responses; it is not proposed that this Authority submits an individual response.

#### Sustainability implications

Implementation of the strategy is expected to contribute to National Park purposes.

#### Financial, legal and equalities considerations

None known.

#### **Recommendation**

**That Members APPROVE the draft response to the consultation on a Water Strategy for Wales (Annex 1 to this report).**

*Author: Michel Regelous*

*PCNPA consultees: Park Direction Team, Leadership Team*

#### Background documents to this report

The consultation documents are available at the following webpage:  
<http://wales.gov.uk/consultations/environmentandcountryside/water-strategy/?lang=en>

## Consultation Response Form

**Your name:** Mr M Regelous

**Organisation (if applicable):** National Parks Wales

**E-mail / telephone number:** [michelr@pembrokeshirecoast.org.uk](mailto:michelr@pembrokeshirecoast.org.uk) 01646 624827

**Your Address:** Llanion Park, Llanion, Pembroke Dock, SA72 6DY

### Consultation Questions

Please respond to all those questions that relate to your areas of interest. Any supporting evidence will assist in the analysis of responses.

#### Water for Nature, People and Business

**1. In looking at implementing legislation, are there any specific areas that you would like us to focus on?**

National Parks Wales welcomes the Welsh Government's proposal to develop a more integrated and participatory approach to water resources management, at a catchment and river basin district scale. Particular reference could be made to the adoption of an ecosystem approach to integrating the competing demands and priorities on water resources and biodiversity.

National Parks Wales would welcome interventions that strengthen links between water suppliers and constraints to future development (see response to question 11).

**2. Do you have any suggestions for improving and extending community involvement in integrated catchment management?**

National Parks Wales suggests involving people on issues that matter to them (information) and/or which they can influence (empowerment). It is important to allocate resources where they can make a difference – for example to land management practice and we comment on this further at questions 3 and 6.

**3. We have highlighted the close link between land management and the water environment. Are you aware of examples of good practice which could be reproduced elsewhere?**

National Parks Wales supports the proactive approach taken under the Welsh Catchment Initiative. Catchment sensitive farming practices were piloted in Snowdonia in an effort to improve water quality in Llyn Tegid and reduce the incidence of algal blooms through the management of run-off and diffuse pollution from heavily-stocked areas. Such practices should be promoted to farming communities throughout Wales.

Landscape management (including upland and peat management) is essentially water management. The Usk and Wye Catchment Initiatives in the Brecon

Beacons National Park are coordinated through a network of Catchment Coordinators who provide and coordinate advice to land managers encompassing best farming practice, habitat creation and flood risk management.

Several projects offer good examples of landscape, catchment based management and research. Examples include Waun Ffynnon Felin restoration work, recent proposals from Dŵr Cymru Welsh Water looking at grip blocking, and peat restoration/erosion control to research being conducted in the Cantref Reservoir catchment to look at land management solutions to reservoir siltation problems.

**4. What opportunities do you see for developing PES schemes in relation to water management in Wales? What should be the role of Government in developing these schemes?**

National Parks Wales welcomes Welsh Government's research into options for Payment for Ecosystems Services (PAES) schemes in Wales. We note that there are already a range of PAES in place ranging from the more direct (e.g. Glastir prescriptions and cross-compliance measures) to the less direct (e.g. visitor revenues and water billing – the reservoirs in the Brecon Beacons National Park, for example, supply water to over 750,000 people, including Cardiff and Swansea).

'Hard' engineering fixes (such as tertiary treatment plants) are often costly and short-lived in terms of long-term catchment-based management problems. Paying land managers such as farmers and graziers to manage the land to an agreed standard ends up costing less in the long term and is more sustainable, particularly because it makes the direct link between the needs of the end users of the resource and the land managers who influence the supply of that resource. The New York City-Catskill Mountains ecosystem payment scheme is a large-scale and well-studied example, where catchment-based water quality measures were pursued rather than end-of-pipe filtration.

National Parks Wales is supportive of Glastir as a delivery mechanism in relation to land management practices affecting catchments and water, although the scheme may need to evolve further and land managers may need additional support through the scheme in order to modify their farming practices significantly. In cases where a more fundamental change in farming practice is needed, PAES may be able to help effect the more significant change required.

National Parks Wales suggests that markets in ecosystems services do not have to be formally planned or centrally administered; a key role of government and its agencies is to use regulation to stimulate innovation and efficiency in resource use within the space defined by regulatory boundaries. Regulation should take account of the most sensitive features of the catchment. This may be a more efficient way of using public finance and market forces to yield price discovery in ecosystems services.

**5. What more could we do to make the most of our water, particularly in terms of supporting our agenda for Green Growth?**

The description of green growth at Chapter 2 (i) reads as an aspiration to do more with the same or fewer natural resources. The description of a circular economy which follows is we think preferable. However this implies that there are or will be limits to growth. It is suggested that these should be acknowledged in the strategy in order not to raise people's expectations that business as usual will always be possible.

For example Dŵr Cymru Welsh Water has used the UK climate change projections 2009 to forecast the likely impact of climate change on supply and demand of water. Over Wales as a whole it is expected that there will be a reduction in deployable output of 16%. The greatest effect will be felt in west Wales, and particularly in Pembrokeshire where there is reliance on river abstractions and where license conditions will limit abstraction at times of low river flows.

National park authorities are charged with increasing opportunities for enjoyment of the countryside. This includes access for non-motorised water sports (sailing; canoeing/kayaking; wild swimming; coasteering etc.) National Parks Wales recommends that utility companies and other land owners and lessees of water bodies should be encouraged not to impose unreasonable or inappropriate barriers, including overly cautious approaches to risk, to greater public use of water.

It has been seen in the UK that loss of wetlands has increased flood risk to settlements and agriculture, by eliminating natural flood storage areas, reducing the rate of water infiltration into the soil and thereby increasing the volumes of rapid surface run off that give rise to floods. It has also reduced or reversed natural means of maintaining and improving water quality. Engineered solutions often deflect problems downstream, but managing surface waters at source can alleviate flooding, improve water quality and quantity, improve soil condition and promote biodiversity.

**Taking Action to Reduce Pollution**

**6. Do you agree with our focus on diffuse pollution? If not, please explain why.**

National Parks Wales agrees with this focus. Management of diffuse pollution has multiple outcomes (habitat and species conservation, flood risk management, bathing water quality improvements).

For example, nutrient enrichment (from fertiliser and other inputs), contamination (e.g. from run-off containing pesticides as well as farm wastes) and sediment loads appear to be a direct result of diffuse runoff from intensively managed agricultural land and are water quality issues for the Pembrokeshire Marine SAC (Milford Haven/Daugleddau Estuary in particular). Bathing water quality issues at

Poppit and Newport are believed to relate to silting and diffuse pollution load from the rivers.

With more intense precipitation events likely to arise from climate change, soil erosion is likely to become an issue of increasing importance.

Please also see our response to question 3.

**7. Are there any additional pollution problems which you believe we should identify? If so, what actions do you believe are required?**

National Parks Wales is aware that there are still some outstanding point source pollution issues.

Inappropriate agricultural conservation practices and the disposal of sheep dip throughout the Brecon Beacons National Park are the primary concerns for water quality. The proliferation of small private sewage treatment works and poorly-maintained existing cess pits and septic tanks also has a significant impact.

Pembrokeshire Coast National Park Authority is aware of issues at Wiseman's Bridge, where there is an urgent need for sewerage infrastructure, and at Pwllgwaelod, where water quality failures may be due to infrastructure issues at Dinas Cross.

Snowdonia has a legacy of pollution from metalliferous mines and from munitions ordnance dumps (Mawddach).

**8. Do you agree with the scope of activity for General Binding Rules, as specified?**

National Parks Wales notes that General Binding Rules appear to focus on process rather than outcomes and that they are dependent on self-reporting. For individual low-risk activities they may be appropriate, however there may still be issues with those activities in aggregate.

**9. Do you agree that variable monetary penalties are the appropriate mechanism for Natural Resources Wales to enforce general binding rules?**

Yes, if they are proportionate, consistently applied and adaptive to changing environmental conditions/requirements.

**Improving the way we plan and manage our water services**

**10. Do you agree with the principle behind aligning the Water Resource Management Plan and Drought Plan with the Asset Management Planning Cycle?**

Yes, this could help improve allocation of resources to strategic priorities.

**11. Do you agree that there is a need to improve our long term planning for waste water and sewerage management?**

Yes. There is a distinct lag between asset management plans and development plans, particularly in rural areas. Sewage treatment works tend to be smaller than in cities but the cost of improvements is generally more expensive as they can be triggered by a single allocation of just a small number of new houses. The provision of new infrastructure for the same cost will provide for many more houses - just because the allocations are bigger.

The quality of some of the Brecon Beacons' waters and ecosystems are threatened by lack of sewerage capacity, industrial point sources and diffuse pollution, from both urban and agricultural sources. Lack of sewerage capacity, for example, leads to a proliferation of non-mains drainage such as septic tanks, private treatment plants and cesspits. These systems add appreciably to the number of potential sources of pollution that need to be monitored to ensure that, if they fail, they will not contribute to the pollution of soil and water.

In certain areas in Pembrokeshire Coast National Park the lack of investment in rural areas is preventing any development from coming forward in cases where whole villages or in some instances multiple village are affected by the same infrastructure constraints. This in turn has implications for future development, particularly where development plans are intended to provide for deliverable policies and proposals.

The capacity of an ageing sewerage system has constrained residential development in certain villages in Snowdonia in the past.

**12. How can we ensure that Water Companies plans link with wider natural resource management plans? Do you have views about how this should be implemented?**

A duty could be laced on utilities to take account of the proposed natural resource management plans. Natural resource management planning boards should include relevant utility planning board members and vice versa.

Strategic objectives could be better aligned under the lead provided by natural resource management plans and delivered, for example, on a river basin or catchment basis.

**13. Do you agree with the proposals to encourage more efficient water use? Are there are further actions that can be taken?**

Yes. An additional action would be to fit water butts in each home which will help provide a non-potable supply and remove surface water drainage from combined sewerage systems. The cost will be offset by reducing demand for water and freeing up capacity within sewage treatment works.

The landscape's capacity to store water and produce other public benefits, including hydropower at the appropriate scale, can be optimised through

restoration of the land's natural capacity to retain rainfall and surface flows, without the need for new reservoirs. Projects such as the Green Valleys Initiative in the Brecon Beacons National Park can make significant contributions to solving the energy and environmental needs of the Park's communities.

**14. Do you agree with our approach to metering? What other factors do we need to consider?**

Yes. The social tariffs will need careful consideration to continue to ensure that all businesses and household customers pay for what they use and to take account of water poverty (question 17).

**15. Do you agree with this approach to managing leakage? Are there any ways we can ensure leakage is sustainably reduced?**

Yes.

**Water affordability and delivering excellent services to customers**

**16. How can we ensure best practice is shared across the water industry, to ensure that innovative solutions to address water poverty issues are shared with others?**

No comment.

**17. Have we identified the key issues and actions in relation to water affordability issues?**

National Parks Wales agrees with measures to assist people at risk of water poverty, and also welcomes measures to reduce the external cost of bad debt on paying customers.

**18. Are there any other approaches we could adopt to support the needs of both domestic and business customers?**

No comment.

**Protecting and Improving Drinking Water Quality**

**19. Are there any additional drinking water quality matters that we should consider? Do you agree with our proposal to investigate the transfer of water supply pipes to the water companies?**

National Parks Wales agrees that investigating the transfer of water supply pipes to the water companies is worthwhile, although the capital and revenue costs will ultimately determine whether this option is feasible. In the same way that sewers are required to be built to certain standards for new developments, a requirement that the pipes are of a certain standard may assist financially. If they are not then a one-off payment from the owner may be required for the pipes to become part of the adopted system.

Along with numerous groundwater private water supplies, surface waters provide a vital resource to communities within and outside the Brecon Beacons National Park. Groundwater supplies are of particular significance to populations along the Park's southern boundary, where the resource is most in demand and several groundwater source protection zones exist. In some areas, groundwater springs are fed from fissures in the underlying geology. Any polluting operation could have serious implications, as this water is a significant source of potable water supplies to domestic and industrial recipients.

**20. Should we develop and consult on a long term strategy to remove the health risks associated with the historic use of lead in plumbing?**

Yes.

**A New Approach for Drainage**

**21. Do you agree with our priorities for drainage matters?**

Sustainable urban drainage systems are a practical way of dealing with surface water and helping to reduce run-off rates, particularly those associated with climate change. Pembrokeshire Coast National Park Authority would further welcome initiatives to remove surface water drainage from combined sewer systems which will help free-up capacity within the existing infrastructure, particularly where investment to increase capacity is limited.

See response to question 5 above.

**22. This section has focused on built infrastructure, which mostly serves developed areas. Is there anything more we should consider for rural areas?**

Please see responses to questions 11, 13 and 21.

**23. Are there any other significant issues which you believe we should have included?**

No comment.

**Supporting Delivery**

**24. Do you agree with our approach to ensuring that regulation is focussed on the Welsh Government's priorities? Do you have any other views or suggestions regarding the regulatory framework and whether it is fit for purpose?**

National Parks Wales agrees with the approach and suggests that the features of natural resource planning (i.e. the state of natural resources), where these are affected by water resources and quality, will be key indicators of regulatory effectiveness and the sufficiency of policy and regulation.

**25. Are there other actions that we should undertake to support innovation across the water sector as a whole?**

No comment.

**26. What more could the Welsh Government do to effectively support businesses in the water sector to grow and prosper?**

National Parks Wales has no specific comment but notes that measures which encourage and enable change may serve business better in the long run, through innovation, first mover and early adopter advantages, better conservation of the water resource and amelioration of flood risk (lowering costs).

**27. Are there other actions that the Welsh Government needs to undertake to support the delivery of this Strategy?**

Review and expansion/additional resourcing of measures funded under Glastir may be necessary.

Allocating resources for researching/testing of a range of PAES prescriptions over a suitable period.

**28. What information would you find useful to assess how the Welsh Government has progressed against key outcomes and actions in the Strategy?**

Brief implementation updates on the Welsh Government website, including assessment of ecosystem outcomes achieved under Glastir and PAES.

**29: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.**

No comment.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: