

REPORT OF THE CONSERVATION POLICY OFFICER

SUBJECT: NATURAL RESOURCES WALES - CONSULTATION ON UPDATES TO RIVER BASIN MANAGEMENT PLANS

Purpose of Report

To report, for Members' information, the Authority's response to Natural Resources Wales' consultation on updates to River Basin Management Plans.

Background

The Water Framework Directive is focused on establishing an integrated approach for the protection and sustainable use of the water environment, looking at water within the wider ecosystem and taking into account the movement of water through the hydrological cycle.

The Water Framework Directive is implemented through river basin management and planning that involves setting out environmental objectives and action for groundwaters and surface waters (including estuaries and coastal waters).

Natural Resources Wales (NRW) and the Environment Agency have consulted on updates to the management plans for the three river basin districts affecting Wales: the Dee, Western Wales, and the Severn.

The catchments relevant to the National Park fall within the Western Wales district and are the Cleddau and Pembrokeshire Coastal Rivers catchment and the Teifi and North Ceredigion Management Catchment. The Carmarthen Bay and Gower Management Catchment does not appear to directly affect the National Park (or vice versa), although it may have implications via the marine travel of pollutants.

Officers' comments sent in response to the consultation are attached at Annex 1. These comments are focussed on the Cleddau and Pembrokeshire Coastal Rivers management catchment.

A note on the European Nitrate Directive and the nutrient status of the Milford Haven is included at Annex 2. This note is based on material supplied by NRW and is of relevance to the consultation, to the status of the Milford Haven catchment and, directly and indirectly, to the National Park.

Financial considerations

Catchment management policy could have implications for the Authority's work programme. It also helps to deliver themes identified in the National Park Management Plan.

Legal considerations

None identified.

Sustainability

The Water Framework Directive requires that other environmental priorities, economic considerations and social issues are considered and taken into account when setting water management objectives.

Equalities considerations

None identified.

Recommendation:

That Members NOTE the consultation response (Annex 1) and the note on the nutrient status of the Milford Haven catchment (Annex 2).

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Consultees: Martina Dunne, Leadership Team

Background Documents

The principal documents are:

- Consultation on updating the Western Wales River Basin Management Plan
- Teifi and North Ceredigion Management Catchment
- Cleddau and Pembrokeshire Coastal Rivers Management Catchment

The full suite of consultation documents is available on Natural Resources Wales' website at:

<http://naturalresourceswales.gov.uk/about-us/Consultations/our-own-consultations/consultation-on-the-proposed-update-to-wales-river-basin-management-plans/?lang=en>

Annex 1 – response to the consultation

Updating the River Basin Management Plans and Strategic Environmental Assessment

This consultation runs from the 10 October 2014 and ends on 10 April 2015.

Name	<i>M Regelous</i>
Sector and Organisation	<i>Pembrokeshire Coast National Park Authority (local authority)</i>
Contact details (e-mail and phone number)	<i>michelr@pembrokeshirecoast.org.uk</i>
River Basin District Response for	<ul style="list-style-type: none">• <i>Western Wales river basin district</i>• <i>Cleddau and Pembrokeshire Rivers management catchment</i>• <i>Teifi and North Ceredigion Management Catchment Summary</i>
	<i><u>Yes</u> I would like a copy of this response to be included in the final response document</i>
Would you like your details to be added to our stakeholder list to keep you updated on this work and events that may be happening locally to you?	<i>Yes</i>

Updated River Basin Management Plan Consultation Questions

Consultation Question 1

Do you have any comments on the consultation document including suggestions on how we could improve this?

The suite of consultation documents is large, necessarily so given the topic area and geographical coverage. However a flowchart on the consultation webpage might help stakeholders to navigate around the documents and to indicate which are most relevant to different stakeholders.

a. Are the Management Catchment Summary documents helpful? Please provide us with comments on how we could improve them.

The Management Catchment summaries are helpful. For many stakeholders these may be the most accessible and relevant part of the consultation.

However there seems to be a missing level of detail between the high level document and the management catchment summaries. Some of the information is available on Water Watch Wales but it would be helpful to have it all in one Management Catchment document for the purpose of this consultation.

b. Does Water Watch Wales work for you? Do you have any suggestions for further improvements?

Water Watch Wales is a useful resource, but some of the detail linked from it falls short of that likely to be expected by someone using the site (see also comment on Question 4).

Consultation Question 2

Do you agree with the proposed changes to the management catchment and water body boundaries?

PCNPA notes that small coastal water bodies are subject to domestic legislation after boundary changes. The consultation suggests that omission of these from larger bodies is likely to result in a greater proportion of river water bodies reaching good status. We are unsure whether this implies that the small coastal water bodies are at greater risk (and may not benefit from measures taken explicitly to achieve or maintain good status in the larger bodies) or whether it is to do with the number of water bodies. In any case, it would be helpful therefore if the measures to address small coastal water bodies were outlined as part of the consultation, particularly given our comments at Question 3b regarding displacement effects of an NVZ.

Teifi and North Ceredigion Management Catchment also includes an area of the Pembrokeshire Coast National Park (Cemaes/Poppit Sands), however our comments are more focussed on the Cleddau and Pembrokeshire Rivers.

a. Would you like to see lakes that are designated as Sites of Special Scientific Interest included within the second cycle?

Yes. We could not find reference to the Stackpole SSSI/Pembrokeshire Bat Sites and Bosherton Lakes SAC but suggest that management catchment plans emphasise the importance of catchment-based works with neighbouring land managers. This is a key element of current Welsh Government Nature Fund projects led by the National Trust in catchments on the Castlemartin peninsula.

Consultation Question 3

Do you agree with the proposed measures?

a. Are there national measures you would like to see included, please tell us why and provide any further information to inform the measures.

b. What do you consider to be the local priorities for actions?

The following issues are highlighted in the current management plan for the National Park area.

Climate and water availability

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. Low flows/increased frequency of storm events may have implications for water quality.

Bathing water quality issues

There is an urgent need for a sewerage scheme in the Wiseman's Bridge area.

Issues with infrastructure at Dinas Cross are a contributory factor to the bathing water quality failures at Pwllgwaelod. Dŵr Cymru Welsh Water and its partners are aware of the problems and are carrying out ongoing investigations and maintenance work to ensure that the treatment facility can cope with the varying capacities received at the treatment facility. However, a substantial investment would be required to improve the facility on a more permanent basis.

Bathing water quality issues at Poppit and Newport are believed to be partly related to diffuse pollution load from the rivers.

Conservation status of the Waterway

The Milford Haven Waterway is at risk of failing to meet its conservation objectives due to elevated nutrient levels. The main significant source of these nutrients has been identified as the catchments of the Eastern and Western Cleddau (potential Nitrate Vulnerable Zone).

While we welcome measures to improve water quality in these catchments, we are concerned that simple imposition of an NVZ could displace slurry and manure storage, and outwintering of cattle, outside the Cleddaus' catchment boundary and into the coastal fringe of Pembrokeshire and the National Park, with consequences for bathing water quality and nutrient loading of inshore waters. Therefore we suggest that a cross-catchment approach is required.

Perhaps there is scope for a centralised approach to anaerobic digestion of farm wastes and production of biogas.

c. What measures can you deliver to help improve the water environment? Please provide information on what these would be, where they could happen and how they would deliver improvement.

PCNPA's nature conservation work, including management of semi-natural grassland, woodland and heathland, and management of factors such as

wildfires, contributes generally to reduction or maintenance of low levels of inputs and to conservation of soil quality and the prevention of runoff.

PCNPA is currently developing a catchment approach to control of key terrestrial non-native plant species in the Gwaun Valley in North Pembrokeshire.

The Welsh Government's Nature Fund is supporting projects researching a catchment-based approach to management of pollution in the Milford Haven Waterway (Pembrokeshire Coastal Forum lead), and into catchment-based action on the Castlemartin peninsula (National Trust lead). The National Park Authority has an involvement in both of these projects.

NRW may wish to consider identifying PCNPA specifically as a special purpose local authority at section 5.4 (Opportunities for Partnerships). We suggest that the National Trust should also be listed in this section as a major landowner and landlord pursuing innovative catchment management solutions.

Consultation Question 4

Do you have any further information to inform where we have proposed an alternative objective?

More detail should be supplied on the alternative objective for the Cleddau and Pembrokeshire Rivers (Nyfer, in particular the confluence with Nant Duad to tidal limit).

Consultation Question 5

Do you agree that measures should be prioritised on the basis of statutory objectives (i.e. prevent deterioration and deliver protected area objectives) and evidence of the costs and benefits of outcomes?

Consultation Question 6

Are the scenarios and economic assessment we have provided as part of this plan helpful?

Other comments

Comments on the "Cleddau and Pembrokeshire Rivers Management Catchment Summary"

Page 6: Skomer MNR has become a Marine Conservation Zone since the consultation was published.

Page 10: It is of concern that the reason for not achieving good status in 19 out of 77 water bodies is unknown. More detail would be welcome here.

Strategic Environmental Assessment Consultation Questions

Consultation Question 7

Do you agree that we have sufficiently assessed the significant effects of the Western Wales River Basin Management Plan? Please describe any further aspects we should consider.

PCNPA notes the potential significant (negative) effect on cultural heritage across the Western Wales River Basin district arising from the measures but support the proposed approach to mitigation. PCNPA would be pleased to assist locally in this regard.

Consultation Question 8

Do you have concerns about the environmental effects of the river basin management plan that are not covered by this assessment? Please describe what they are.

Consultation Question 9

Are there other mitigation or opportunities that we should consider delivering with the proposed measures?

We have outlined some potential actions in previous questions.

Thank you for the opportunity to comment on this consultation, and for the stakeholder event on 26th March 2015 organised by NRW and the Pembrokeshire Coastal Forum CIC; this was very useful.

Annex 2 – Note on the nutrient status of the Milford Haven catchment

The following note is based on a topic note prepared by NRW in March 2015.

The European Nitrate Directive aims to reduce water pollution caused by agricultural sources and to prevent such pollution in future. Land that drains into, and contributes to the pollution of waters is designated as Nitrate Vulnerable Zone. A mandatory Action Programme of measures to tackle nitrate loss from agriculture is applied within each nitrate vulnerable zone.

Under the Directive nitrate vulnerable zones and action programmes must be reviewed every four years. NRW is beginning a new four year review period and any zones required for designation in 2017 would need to be drafted by the end of 2015.

The Pembrokeshire Marine Special Area of Conservation is failing conservation status due, amongst other things, to the presence of opportunistic macro algae in the shallow inlets and bays feature.

Milford Haven Inner and Outer water bodies are failing Water Framework Directive status.

The influence of nutrients in Milford Haven Outer for Water Framework Directive is under consideration.

Milford Haven Catchment has “Amber” status of being at potential for future classification as a candidate for Nitrate Vulnerable Zone designation.

The issues to be taken into consideration for Milford Haven and its catchment are:

- The enrichment of water by nutrients
- The accelerated growth of algae and higher forms of plant life brought about by nutrient enrichment
- Any undesirable disturbance to the balance of organisms present in the water; including significant adverse effects on flora and fauna, including loss of ecosystem biodiversity and proliferation of opportunistic macroalgae and severe outbreaks of toxic or harmful phytoplankton
- Any undesirable disturbance to the quality of the water concerned - including deterioration of the quality of the which produces harmful effects for ecosystems and to deterioration of the colour, appearance, taste or odour of the water or any other change which prevents or limits water uses such as tourism, fishing, fish farming, gathering shellfish and shellfish farming, abstraction of drinking water or cooling of industrial installations.

The zone area for Milford Haven would include approximately 1800 farms, affecting 25% of the Welsh dairy herd and 50% of the Welsh potato crop.