



**Cyfoeth  
Naturiol  
Cymru**  
**Natural  
Resources  
Wales**

# **Summary of Responses to the updated Dee and Western Wales River Basin Management Plan Consultation**

September 2021

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# 1. Background

Natural Resources Wales (NRW) is the Competent Authority for implementation of the Water Framework Directive Regulations 2017. These establish the way in which we protect and improve rivers, lakes, groundwater, transitional and coastal waters. The Regulations are based on a six-yearly cycle of planning, action and review called River Basin Management Planning.

We have responsibility for drawing up the Western Wales and Dee River Basin Management Plans (RBMPs) in Wales - working in partnership with a wide range of public, private and voluntary organisations.

The RBMPs will set out the strategic issues facing the water environment in the River Basin Districts (RBDs) and the actions planned to protect and improve it between 2021 and 2027. River Basin Planning is continually evolving as our environment changes together with our collective knowledge and approaches. The updated plans are an opportunity to review the current status and what can be achieved in the future.

## 1.1 Consultation on the draft River Basin Management Plans

The first RBMPs were published in 2009. They outlined what would be done to protect and improve rivers, lakes, estuaries, coastal and ground waters over a six year period to 2015 (the first cycle). Since then we have published the second RBMPs in 2015 (the second cycle) and this consultation was an opportunity to comment on the draft RBMPs for the third cycle.

NRW has worked closely with the Environment Agency (EA) to produce the Dee RBMP and will continue to do so throughout the implementation phase. Separate to this consultation, we are also working with the EA who lead on the production of the Severn RBMP and the draft Severn RBMP is due for consultation later in 2021. The Western Wales RBMP is wholly within the responsibility of NRW to produce.

The draft plans describe the main issues for the RBDs and highlight key actions proposed for dealing with them. A supporting technical annex gives more detail on the current state of waters, the actions proposed and the mechanisms that can be used to drive these actions.

We worked with the Wales Water Management Forum to promote the consultation. The national Forum includes representatives from many of the organisations we work with, all with key roles in putting the plan into action.

This summary provides an overview of the responses in relation to the consultation questions and any general comments/ issues provided by respondents. Responses from the consultation are being used to further develop the final RBMPs. NRW undertook an SEA screening based on the information presented in the draft plans and will review any significant changes in the ambition and scope of the final plans to ensure that its SEA screening decision remains appropriate. In addition, NRW welcome the responses

received to the HRA will consider them in the production of the final document. The draft HRA considered the draft Programme of Measures that accompanied the draft plans.

## 1.2 River Basin Management Plan – Promotion and Engagement

This consultation set out a number of specific questions. Responses are essential to shape and develop the statutory RBMPs including the actions planned for improvements between 2021 and 2027. The following engagement was undertaken:

### NRW Website

The consultation documents for the updated Dee and Western Wales RBMPs were published on the consultation hub on our website.

### External Stakeholders

At the start of the consultation, an email was sent to more than 700 stakeholders from all sectors as well as individuals. The consultation was promoted via existing networks and ongoing engagement including through the Area Statement work.

The consultation was promoted at partnership meetings including the Middle Dee Catchment Partnership, Independent Environmental Advisory Panel, Pesticide Partners Group, the Alyn Anglers, Biodiversity Network (North East Wales), the Chartered Institution of Water and Environmental Management (CIWEM) Water Resources Panel, Clwyd, Gwynedd and Denbigh Local Fisheries Advisory Group. The Welsh Clean Seas Partnership issued an article on the consultation in their winter newsletter. It also featured in NRW's monthly newsletter Cyfoeth. A press release was also issued when the consultation was published.

NRW were supported by the Wales Water Management Forum, Wales Land Management Forum, National Access Forum and the Wales Fisheries Forum who promoted the consultation to their members.

Awareness of the consultation was raised internally within NRW to encourage staff to raise awareness of the consultation to their external contacts. For example, the Area Statement Practitioner Group and the Marine Protected Area Steering Group. The consultation also featured in several internal communications such as the NRW intranet, yammer and the Monthly Guide for Managers.

We wrote to NRW Strategic Assessment Team, Natural England, EA and CADW to consult on our screening determinations under the Environmental Assessment of Plans and Programmes Regulations 2004 (also known as the Strategic Environmental Assessment (SEA) regulations) which accompanied the consultation on the draft Western Wales and Dee RBMP. None of the statutory consultees disagreed with our approach.

### Social Media

Through social media, it is estimated that 1,271 people have read the tweets on @Water NRW Twitter. There were 21 retweets to the water account twitter followers.

## Statutory Adverts

Notices of the consultation were published in the Western Mail, Daily Post and the London Gazette as required by the WFD Regulations 2017.

A further message to all stakeholders was issued 30 days before the consultation closed. The internal communications channels mentioned above were also used to issue reminders of the closing date.

## 2. Summary of Responses

NRW received 29 responses to the consultations, there were 15 for the Dee River Basin District and 14 for Western Wales. A list of respondents can be found in Appendix 1.

The respondents were recorded under the sectors that they represented. This included;

- Agriculture and Rural Land management
- Angling and Fisheries
- Local Authorities
- Conservation and Recreation
- Water Industry
- Community Group
- Individuals
- Other

The following pages set out a summary of the responses NRW received.

## 2.1 Consultation Questions

### **Q. Strategic approach for managing chemicals: Tell us if you agree with the approach and the planned measures to improve chemical status, and why**

In general most respondents agreed with NRW's approach to managing chemicals. Concern was raised that there appears to be little control over the use of insecticides, and that reduction alone should not be seen as a success as these can significantly impact aquatic invertebrates. Also of concern is the use of weedkiller and the lack of a safe replacement.

Many respondents expressed concern over the lack of monitoring and enforcement and one considered that this shows a lack of intention to address chemical contamination in our rivers. The deterioration in the quality of water in rivers due to pollution incidents is of concern.

One respondent thought that ultimately we should aim for a chemical free environment rather than having to measure the levels and report the damage caused. It was agreed by a number of respondents that the testing of shellfish and fish tissue should not negatively impact on populations and one respondent made the point that it would be better to develop a way of testing on live specimens so that they could be released again. It was welcomed that NRW will work to research new and effective means of monitoring which does not impact or harm species as part of the monitoring programme.

It was recognised that some chemicals need to be managed at the national scale but that some could be managed at a catchment/local level. Concern was raised by one respondent that pesticides such as fipronil and imidacloprid (used in dog flea collars) are being found in water courses linked to dogs swimming in rivers and that the ban on use in agriculture has not been extended to all uses. It was felt that other areas of the environment also need to be considered as part of seeking to improve water quality. For example, air quality can be affected by agricultural chemicals, which in turn can accumulate and contribute to the contamination of water bodies.

One respondent commented that there was a lot of investment put into the treatment of potable water and that they work collaboratively with pesticide users to reduce and mitigate the impacts at source. However felt that the cost of this investment is passed to bill payers and does not reflect the 'polluter pays principle'. They noted that continued monitoring for chemicals would be necessary to assess the effectiveness of legislation and to develop a picture of emerging chemicals.

Another respondent welcomed the fact that uPBTs will be reported in full for the first time but felt that the RBMPs should state clearly the percentage of water bodies that are being monitored for uPBTs. It was also thought that NRW should clearly state how they plan to reach significant levels of monitoring coverage, including target dates. They believe that there should be much stricter controls on the use of herbicides, alongside support and advice for alternative methods of weed control. They also felt that non-chemical alternatives are vital as a ban on glyphosate could lead to the use of more damaging products.

**Q. Our proposals for national measures: Tell us about other national measures you would like to see included and why**

A number of different measures and comments on the proposed measures were suggested by respondents including;

- Stricter control of flood defences carried out. In some case river beds have been dredged to protect river banks however this has caused severe damage to the river bed and has destroyed aquatic river life.
- A national measure to address phosphate pollution. The change to phosphate standards by NRW in January 2021 has profound implications for the water industry, agriculture and planning (development) across the whole of Wales.
- Nature-based solutions applied at a catchment-scale can best enhance rivers and aquatic ecosystems for the benefit of people and nature. This includes the restoration of resilient upland habitats and natural floodplains, the creation of leaky dams, using woody debris in streams to slow the flow of water and the reintroduction of species such as beavers to restore a key missing element of natural flood management. These practices can help to adapt to climate change as well as providing ecosystem services such as reduced flood risk, better drought resilience, increased carbon storage and more habitat for biodiversity.
- Further research and consideration of extending the 'one field back' approach, that is being adopted along the coast to buffer maritime habitats, applied to wetland and riverine habitats.
- Mapping the remaining locations of rare riparian habitats such as MG4 and MG8 floodplain meadows to evaluate the potential for creation and restoration. This work has already been completed for some river catchments in Wales including the Usk, but there is potential across other river catchments.
- Additional monitoring should be taken forward as a key national measure for the RBMPs. Not just for WFD parameters but also for other issues such as micro plastics and pharmaceuticals. Monitoring these parameters now will provide data which could be used to inform solutions and interventions going forward.
- Place legal limits on use of CSOs and hold polluters to account. The current definition of 'exceptional circumstances' isn't clear enough to enforce compliance. There should also be consistent and widespread monitoring of CSO discharges to regulate and enforce compliance of water companies.
- Upgrade faulty infrastructure – A programme of regular assessment and upgrading of water infrastructure must be in place, along with a substantial investment. Implementing nature based solutions should be prioritised.
- Septic tank assessment –NRW should adopt rules similar to the EA's Septic Tank General Binding Rules which requires all septic tanks discharging to surface water to be replaced. It is important that we have strict regulation on the use of septic tanks to ensure that pollution from faulty septic tanks is minimised.
- NFU Cymru has long advocated the establishment of a Farm Liaison Service within NRW to provide advice to the farming community.
- Consideration should not be given to any additional national measures until we have a robust and adequate dataset within Wales on the existing measures required. The monitoring for WFD has declined dramatically since the first RBMP.

Comments on some of the strategic measures included;

- **Water Strategy for Wales** – subject to a refresh in 2021 we understand the overarching principles will remain the same. The extent to which this is appropriate in a changing political landscape is far from clear.
- **NRW WFD Programme** – NRW has worked to develop an affordable programme of measures for the third cycle, however, further funding and resource will be needed and there is concern that affordability will be assessed narrowly through the lens of cost to NRW. The farming industry cannot afford to bear the cost of delivering WFD objectives. It would be appropriate to evaluate the effectiveness of the WFD Implementation Fund, including levels of ambition, outcomes delivered, value for money and management/administrative costs.
- **River restoration programme** – farmers who will be central to the delivery of river restoration activity have not been engaged in this programme and there is concern that NRW is investing significant sums in programmes that will be presented as a *fait accompli* without developing proposals that are realistic, feasible and affordable in collaboration with the farming industry.
- **Flood Risk Management Plans** – the plans for the second cycle must ensure that the flood risk management service provided by farming is properly recognised and valued. Greater value should be placed on agricultural land in flood risk appraisals recognising the importance of a resilient food and farming sector. Delivery of the RBMPs is likely to rely on securing the buy-in of farmers and more needs to be done to develop those relationships.
- **Water resources** – Welsh farming must be able to access its fair share of water resources now and in the future to enable sustainable growth of the sector. The full economic value of Wales' water must also be understood to ensure this value is returned to the people of Wales with those who manage the landscapes that provide this important service fairly rewarded.
- **Sustainable Land Management – Agriculture** – based on proposals within the recent Agricultural (Wales) White Paper, the extent to which the Sustainable Farming Scheme will deliver improved water quality in line with the RBMPs is unclear. Whilst the White Paper included a strong focus on the regulatory baseline, the extent to which blunt regulatory tools will be effective in delivering WFD objectives is far from proven.
- **Sustainable Land Management – Forestry** – it is pleasing that NRW is committed to constantly improving the environmental quality of the Welsh Government Woodland Estate. This will be welcomed by many of our members who frequently observe very poor practice, particularly, during and after felling operations, with impacts for surrounding farms and the wider environment.
- There should be a re-introduction of regular ditch/stream/ river clearing as this was something that used to be done regularly but due to funding cuts, no longer happens leading to erosion of river banks in some areas increasing rapidly.
- The potential impact on agricultural businesses needs to be considered. The consultation rightly points out that sustainable management of water resources face challenges. Farmers are at the forefront of facing the impact of climate change which will mean water availability and management will become of increasing importance. More detailed analysis is required, as part of the river basin management planning process, on the impact of climate change on meeting WFD good status across the river basin districts given that we are already observing algal blooms as a consequence of low flows and sunny weather conditions. The impact of extreme weather on water flows and river ecology needs to be understood and reflected in targets.

- A wide variety of projects are being delivered to tackle the challenges facing the water environment. These projects are targeted largely based on the monitoring undertaken for WFD classification. To ensure these projects are targeting the correct problems and in the correct areas, this monitoring needs to be as accurate and as robust as possible. Currently, too much is being asked of too little data and this is likely to create measures that are being identified incorrectly, there should be an increase in the volume and locations of monitoring undertaken to help ensure the national measures are focussing on the correct areas.
- There are many groups trying to achieve broadly the same goals of clean and plentiful water but all with slightly different approaches and responsibilities. This is both confusing and inefficient and leads to conflicting approaches and suboptimal plans. In order to maximise the results that can be achieved, all organisations with a remit to manage not just water but also land need to come together more effectively in both the long term strategic thinking and the shorter term operations of catchments.
- A holistic and joined-up approach to measures must be taken to align with both the Area Statements and Nature Recovery Action Plans for greatest impact.
- Establishing the programme of measures needs to be realistic about what is possible on the ground. The recent SAC Rivers Phosphates review, for example, highlights widespread (61%) failures for phosphate across Welsh SAC rivers not because of a deterioration in water quality per se, rather as a result of new aspirational targets for phosphates established by JNCC.

**Q. What measures can you deliver to help improve the water environment? Tell us where they could happen, relevant partnerships and how they would deliver improvement**

A number of different measures and suggestions were put forward by respondents, some examples are included below;

- Lobbying to ensure that legislation is put in place to control the unacceptable level of agricultural pollution which enters our rivers and streams.
- The Rhyl and St Asaph Angling Association has over 150 members, and we have members who wish to volunteer to take part in monitoring the water quality of our local rivers. This can be done via co-operation with NRW and River Trusts.
- NRW could partner up with community councils and train them up on how to care for a stretch of river within their community.
- Conserving the Park – Gwarchod y Parc is a National Park Authority scheme helping landowners to deliver conservation land management in the National Park area, complementing national schemes.
- Stitch in Time - Pwyth mewn Pryd is a National Park Authority scheme working with landowners and volunteers to eradicate key invasive plant species on a catchment / drainage basin basis.
- Surveying the Waterway Environment for Pollution Threats (SWEPT) was an award-winning, volunteer-led effort to collect environmental data within the Milford Haven Waterway area, led by the Pembrokeshire Marine Special Area of Conservation Officer and delivered with the West Wales Rivers Trust, Pembrokeshire Coastal Forum and the Darwin Centre.

- The Catchment Level Environment Action Network (CLEAN), led by Cwm Arian Renewable Energy, has adopted the SWEPT method in the Nyfer catchment. It is hoped that a second phase, including practical interventions coupled with education and citizen science, will follow.
- Pembrokeshire Coastal Forum and PLANED's Ecosystem Enterprise Partnership Building Resilience in Catchments initiative investigated the potential for a nutrient trading scheme for the Milford Haven and Cleddau Catchment.
- National Trust Cymru are working in partnership with tenant farmers, local communities and key stakeholders to create a cleaner, healthier and more resilient environment. The Upper Conwy Catchment project with NRW is a significant example of where we are collaborating to restore natural habitats, alleviate flooding, connect people with the catchment and ensure its sustainable long-term management. The current phase of this project, 'Tir Afon', funded through Welsh Government's Enabling Natural Resources and Well-being (ENRaW) Scheme is planning to deliver a programme of soil health surveys and advice for farms within nutrient-enriched sub-catchments in the Upper Conwy catchment.
- National Trust Riverlands programme, working across twelve catchments in England and Wales. The work is focused on: nature-friendly farming; river restoration including reconnection to floodplains; habitat restoration and creation of associated freshwater and terrestrial habitats; community engagement and citizen science projects; reintroduction schemes returning native species; managing problematic non-native species; landscape-scale conservation across whole catchments; and climate change mitigation.
- At Bodnant Garden silt traps have been installed to help slow the flow of water and at Dyffryn Gardens also working with neighbouring landowners to reduce water run-off, championed sustainable drainage systems (SuDS) and created attenuation ponds and flood areas diverting from the mansion and formal gardens.
- National Trust are working with their farmers to restore natural features such as wetlands and woodlands which, in the right places, can help filter run-off and naturally clean the water. Encouraging the restoration and maintenance of habitats at field margins, such as ponds and species-rich hedgerows, providing a refuge for wildlife and corridors to reconnect the landscape. We are also promoting alternatives to or reducing use of pesticides and fertilisers.
- Wales' National Peatlands Action Plan to maximise water retention in the uplands and attenuate floodwater at source. This ensures that the Trust's peat resources are identified and restored as needed and championing good upland habitat management, with measures including: no tree planting on blanket bogs, creating new blanket bog habitats, increasing vegetation cover by reducing sheep numbers/supporting cattle grazing and encouraging natural regeneration where appropriate.
- Consumer Council for Water (CCW) carries out research into the views, preferences and attitudes of water customers in a number of key areas that can be used to support water companies in delivering the RBMPs. Informed consumers are much more likely to engage in water saving activities and seek out the practical support and advice on offer.
- The Middle Dee Catchment Partnership is working to improve the health of the water bodies of the Middle Dee. The partnership is made of a variety of organisations with a variety of strengths. The partnership can help deliver many of the outcomes identified in the Dee RBMP, and in particular, help to guide and

prioritise areas of work, bring together stakeholders and deliver practical on the ground projects.

- United Utilities is improving the water quality in the River Dee. We will continue to actively participate in the existing forums and partnerships, as well as new partnerships, and we will continue to help improve the water environment in line with our company objectives to safeguard water resources.
- Afonydd Cymru delivered £1.4m of habitat restoration in Wales in 2020-21. We actively wish to support Welsh Government and NRW in objectives to deliver habitat restoration and fisheries improvement in Wales. Prioritising and implementing these measures would not only meet Fisheries Restoration requirements, but would also deliver additional benefits to rivers currently classified as failing under WFD for Fish, Mitigation Measures and hydromorphology.
- Afonydd Cymru and the rivers trusts of Wales are currently seeking to deliver nature-based solutions to support nutrient management in Wales, particularly phosphorus compliance on failing SAC rivers. The Wye and Usk Foundation have pioneered this approach with development of two wetlands on the border in England.
- There is considerable evidence of CSOs not operating within permit in Wales. Afonydd Cymru and the rivers trusts have a unique on-the-ground knowledge of the river catchments, working closely with a large number of angling and fishing clubs, farmers and landowners. We have established a reporting network with Dwr Cymru Welsh Water for reporting CSOs but we believe the movement could offer considerable further evidence, knowledge and monitoring capability to support the tracking and operation of CSOs.
- Afonydd Cymru is working with Dwr Cymru and the Rivers Trust to develop Catchment Monitoring Cooperatives to provide training for citizen science data surveys, collect consistent data and develop reporting and mapping functionality. We would welcome the opportunity to work with NRW to develop this further.
- In 2021, Afonydd Cymru established a Memorandum of Understanding with Woodland Trust Wales. We are also working with Fishmongers Association to look at partnerships and delivery opportunities between Scotland and Wales. We are currently reviewing many options for tree planting in Wales.
- Afonydd Cymru and the rivers trusts of Wales deliver farm management and advice across Wales. We are working with many partners and stakeholders in this including food suppliers, retailers, farmers and landowners, Farming Connect and NFU.
- RSPB Cymru has actively engaged with previous and ongoing projects that have helped to improve the water environment, including current RSPB Cymru led work on The Living Levels Landscape Partnership (LLLP). The Programme seeks to conserve and restore the important natural heritage features, primarily drainage ditches and reens of the Gwent Levels.
- RSPB Cymru has also taken a number of steps to address water management and storage on Ty Llwyd, our in house farm which is part of the Lake Vyrnwy estate, we have improved water management infrastructure including increasing the capacity of covered storage and maintaining the separation between clean and dirty water. Also used the improvements to advocate and demonstrate how water can be managed within a farm business to reduce environmental impacts.
- The RSPB also has extensive experience of managing INNS, including investigating catchment wide solutions to INNS. The RSPB would be prepared to engage on measures to address INNS across a range of sites and scales, and would

particularly welcome the opportunity to engage on measures to address issues directly affecting RSPB managed sites.

- The RSPB are engaged in landscape scale projects at a number of sites across Wales, these include the Gwent Levels, the Ellenydd-Mallaen, the Meirionnydd Oak Woods and the North Wales Moors. RSPB Cymru is actively pursuing projects within these areas that will improve the water environment and contribute to achieving FCS on designated sites within these landscapes.
- The Middle Dee catchment partnership has a wealth of experience and network of individuals which can help further the outcomes of the RBMP. We would recommend that the partnership is consulted on all programmes undertaken as part of the RBMP, this will help to avoid replication of work and ensure the best value for money.
- United Utilities share raw water quality monitoring data, much of which is collected in collaboration with NRW and the EA in relation to the River Dee pollution protocol. We have recently completed a natural capital baseline for the North West region, including the water supplied from sources originating in Wales. The baseline will help to form a basis from which change can be tracked, as we believe measuring benefits in terms of natural capital is key if we are to ensure our plans in the future are optimised across ecosystem services.
- More should be done to retain and restore upland blanket bogs as flood alleviation measure, there were no such measures apparent in the Cambrian Mountains area. In flood affected areas return that land to its previous state which held excess water during heavy periods of rain and allowed the water to be released slowly. Planting more deciduous woodlands and looking at carrying out environmental measures on large dairy farming.

**Q. Our objectives for the 2021-2027 RBMPs: Can you provide further information to help inform the outcome of the objectives and the economic assessment?**

One respondent pointed out that the section "Manage pollution from rural areas" states that "The total cost of resolving agricultural pressures according to current legislation in 15 water bodies has been calculated at £10.5 million" and that the plan is "to strengthen regulatory, financial and operational mechanisms to support a sustainable agricultural sector that protects the water environment, from catchment to coast." Economic modelling needs to include the knock on impact on farm businesses should they face more stringent regulations.

A respondent agreed that measures need to be cost effective and some measures cannot be taken forward as they are disproportionately costly but believes economic analysis must take into account the factors that affect agriculture's ability, at farm-level, to cover the costs that would be required to meet WFD objectives. NRW, in establishing the objectives, measures and actions for WFD, must properly take into account the cost impact and the ability of farm businesses to absorb these costs recognising that farming, unlike other sectors, is unable to pass on costs to customers.

Another respondent felt that regulation of agriculture is not being undertaken to an adequate level. In the case of the English section of the Dee, they were not aware of any farming regulatory visits being undertaken. They would like to see a clear objective in the RBMP for increased focus on regulation as an important tool in tackling agricultural pollution. They also felt that the current regime of flow releases from the Dee's reservoirs

are causing damage to SAC species within the Dee and that the current draft RBMP does not identify an objective or programme for researching and improving these releases.

Concerns were raised by one respondent that current reporting and classification of WFD is incorrect and that NRW is incorrectly reporting improvement from 2015 to date. They understand and accept that the current classification will be updated for the 2021 classification however, they felt it made it difficult to comment on the consultation. They also questioned whether a 4% improvement in status is a desired outcome for Wales and whether public money is being spent effectively. Whilst they recognise that NRW has identified this issue, by considering cost benefit ratios for delivery, they question whether, based on the 2018 data, any improvement has actually been achieved.

One respondent offered to provide evidence that would be relevant to help inform the objectives including Nature & Carbon Mapping, Sustainable Shores, South Coast Wetlands, Reserve Issues, INNS, Water flow issues from abstraction, Diffuse pollution from management of adjacent land, Impacts of CSOs on wetland sites, Saltmarsh cost benefit analysis, NLHF Nature Based Solutions Projects and Sustaining the Gwent Levels SMS Project.

It was felt by one respondent that at this time there is more emphasis on supporting agriculture irrespective of the damage to the environment, and that consideration was given to the technical feasibility and cost implications rather than taking positive action, as it could be conceived as 'disproportionally costly'.

One respondent made the point that WFD objectives must be technically feasible, affordable and not impact on the ability of the farming sector to produce food for our growing population.

**Q. Opportunity Catchments: What do you consider to be the local priorities for action in the opportunity catchment in the Dee and Western Wales river basin districts?**

A number of respondents were pleased that Area Statements have helped inform the selection of opportunity catchments and welcomed the integrated approach taken. It is positive to see that non SAC rivers have also been selected and prioritised for actions.

Another respondent mentioned that they are also very pleased that NRW has been successful in securing the 4 River LIFE project and funding which will boost investment and environmental improvement on the 4 SAC rivers in Western Wales. However it was noted by another respondent that currently different approaches are being applied across Area Statement areas and this sometimes creates inefficiencies for delivery and working with stakeholders. In some areas, this means that delivery currently seems to be very NRW-led with little partnership working or involvement of other stakeholders in that Area Statement area. They agreed with the local priorities identified for resolution in Western Wales, however noted that at this stage there is no detail provided on the local measures and actions required in each area. They were concerned that facilitation of grants and funding through NRW is hindering delivery on the ground. There are six years to 2027 and yet significant guidance and policy is not in place by NRW to facilitate the delivery that is required to deliver these improvements, particularly to allow nature-based solutions to be delivered within Wales.

One respondent noted that the consultation is silent on the governance arrangements around the Opportunity Catchments, within those catchments where rural diffuse pollution has been identified as an issue, they encourage NRW to consider how it will effectively engage and collaborate with farming on the development of actions and solutions. They also felt that whilst NRW continue to advocate Area Statements, based upon their experience of interacting with the development of Area Statements to date, they would not support their use as an evidence base and/or prioritisation tool. They do not believe Area Statements are the result of effective collaboration with the farming sector who should be viewed by NRW as key delivery partners. As a result, they believe the Area Statements can form no basis upon which to base policy and delivery decisions in a given area.

It was also felt by another respondent that actions need to join-up with Nature Recovery Action Plans and consider the post-Brexit modelling of changes to land use and farming undertaken by Welsh Government's Geographical Vulnerabilities Project. They added that interventions should not be looked at in isolation and an integrated land management approach working with landowners, partners and wider stakeholders is crucial to the delivery of the plan and its objectives.

One respondent was pleased that the Cleddau / Milford Haven opportunity catchment had been selected as many of the features of the Pembrokeshire Marine, Cardigan Bay and Carmarthen Bay SACs are in unfavourable condition and pollution is identified as a common factor. An urgent reduction in agriculture-derived nutrient inputs (notably nitrate and phosphate) from point and diffuse sources was felt to be essential. There was also concern regarding the adequacy of the sewerage infrastructure, including domestic (unconnected) systems, unlicensed discharges and overflow discharges. It was felt that domestic septic tank systems need to be adequately inspected, maintained and monitored.

Another respondent was pleased that the Dee had been identified as an opportunity catchment and they look forward to seeing what this means in practice. They feel that the local priorities for action are: improving releases from reservoirs upstream to create a more naturalised flow regime in the river, reduce agricultural and sewage pollution, river restoration and community engagement focussed on sustainable drainage. They suggested that to achieve their full impact, multi-year projects with committed funding for each year should be identified and that work based on annual budgets will not be able to tackle the priorities strategically.

One respondent requested that the Taf be included as an opportunity catchment as this river was a 'jewel' previously but felt it had deteriorated.

Respondents suggested a number of actions that they felt were needed for the Opportunity Catchments, including;

- A reduction in the levels of agricultural pollution.
- River bailiffs to report pinch points and blockages effectively
- Legislative control by the Welsh Government to prevent agricultural pollution to the rivers and still waters of Wales.
- Legislative control by the Welsh Government to prevent the release of untreated sewage in the rivers of Wales.
- The control and eradication of invasive species on and in the rivers of Wales.
- Take measures to improve the habitats of the rivers of Wales.

- Control and take out enforcement action on all illegal Flood Risk management, which is seriously damaging the river habitat, including the loss of aquatic life, invertebrates, and fish spawning areas.
- Reduce the need for additional water abstraction.
- Control the need for Hydro Electric schemes on minor rivers in Wales, which are now having an impact on damaging the river habitat.
- Create a better working relationship between the angling groups in Wales and the Welsh Government and NRW to use their wealth of knowledge.
- Protection and development of "river habitat" for all fish and invertebrates. Clean up and modernise all sewage plants and their outfalls. Remove "High Water" discharge consents.
- Reducing phosphate within the Dee.
- Encourage residents to use eco-friendly cleaning products, encourage local shop owners to sell eco-friendly products at prices people can afford.
- Lobby large companies to stop them producing products that actively harm our environment.
- Continue to work with farmers and other landowners to educate and encourage them to use more environmentally sound practices / resources.
- Encourage "grass roots" level involvement in working to clean our water. Work with water companies to minimise response times to leaking water pipes; seeing the amount of water that gets wasted can make people feel as if their little bit doesn't really make a difference.
- Robust monitoring, regulation and penalties – the consultation refers to this area as a highly regulated area, however current standards are not robust enough to ensure good status.
- Upgrade faulty infrastructure – A programme of regular assessment and upgrading of water infrastructure must be in place, along with a substantial investment to address where previous underinvestment has been a driver of continued misuse of CSOs. Implementing nature based solutions should be prioritised over hard engineering, and this is likely to provide a significant saving on the required investment.
- Catchment scale response to Invasive Non-Native Species (INNS)- A co-ordinated and catchment scale approach to manage INNS from NRW, to protect wetland and coastal habitats from INNS arriving through the river and estuary systems.
- Restoration of upland habitats –Initial focus should be on ensuring designated sites are restored and funding is available for their sustainable management. Restoration of afforested peatlands within the Welsh Government Woodland Estate should also be a focus.

For the Swansea Bay Opportunity Catchment: Neath catchment – it was suggested that the following needs to be addressed;

- Barrier removals on the Neath catchment - impacting Annex I & II species
- Invasive Non-Native Species (e.g. Japanese knotweed & Rhododendron infestations)
- Non-permitted sewage discharging waste water outfall pipes discharging in to the River Dulais (tributary of the Neath)
- Significant mine pollution on the Garwed Brook

**Q. What measures could you help deliver and what partnerships should we be aware of?**

A number of respondents expressed a desire to work in partnership with NRW. Many of the projects mentioned were the same as those in the question on measures above with the addition of the following;

- North Wales Rivers Trust (NRWT) have undertaken work to improve water quality in the Conwy/Clwyd/Yns Mon and North Wales catchments.
- Creation of River Guardians initiative in the Swansea Bay area to cover the opportunity catchments - link this work up to the 'Friends of' and 'Adopt-a-trib' scheme funded by Welsh Water. Funding could also be provided to the Salmon & Trout Conservation Cymru to expand their Smart Rivers initiative to the Swansea Bay catchments. Support initiatives such as the Healthy Rivers partnership between Welsh Water and Groundwork Wales to help them expand their positive impact to river restoration. Following the example of the North Wales Wildlife Trust (Our River Wellbeing Project) fund the role of a River Care Officer to manage river restoration volunteers in the Swansea Bay Opportunity Catchment.
- Community Councils could be a useful contact to promote an eco-drive i.e. encouraging everyone to use environmentally friendly cleaning products and perhaps distributing information about how little changes can make a big difference to the health of our waterways.
- National Trust manage internationally important wetland habitats in Pembrokeshire such as the Castlemartin Corse SAC to the coastal landscape of the Llŷn Peninsula where we are trialling a Payment for Outcomes model to support nature-friendly farming and taking the 'one field back' approach to create buffer zones. Further inland, ongoing work includes conserving the natural oxbow lakes on the floodplain at Dinefwr, a NNR designated for its aquatic plant interest, where we are creating a more natural floodplain system and working with tenants on low intensity conservation grazing.
- Upper Conwy Catchment project, National Trust remain a lead delivery partner in restoring upland and river habitats to help alleviate flooding and improve water quality for wildlife and people. Elsewhere, we are involved with Dnr Cymru's Brecon Beacons Mega Catchment project which is taking a landscape-scale approach and working beyond boundaries to help improve water quality, biodiversity, support communities and adapt to climate change.
- Welsh Dee Trust Restoring River Habitat- 'Restore natural processes and connectivity of rivers to improve habitat for all species'
- Water Wise Farming- 'Work with the agricultural industry to reduce the loss of pollutants into watercourses'
- It Shouldn't be in the Dee- 'Create a community-led approach to eliminating sources of pollution'
- Environmental Flows- 'Ensure releases from the River Dee's reservoirs are done in an environmentally suitable way as possible'
- United Utilities investigate, identify and deliver measures to improve water quality. We are investigating the issue of turbidity through a monitoring programme agreed with NRW and the EA. The outcome will inform a proposal for the AMP8 WINEP comprising a targeted programme of catchment interventions to address the highest risk locations, for example riparian tree planting and fencing to reduce river bank

erosion whilst offering multiple benefits for other ecosystem services e.g. biodiversity and carbon sequestration.

- RSPB Cymru would be interested in contributing to action within our other identified priority areas: • Anglesey and the Llyn Peninsula • Elenydd/Mallaen • Dyfi Estuary. These areas have been identified as priorities by RSPB Cymru due to the importance of these landscapes for securing priority biodiversity in Wales.
- RSPB has been involved in and manage several large managed realignment partnership projects, such as Medmerry in England, which has allowed us to develop expertise in designing and implementing large scale managed realignment projects.
- Existing RSPB Cymru partnerships with water companies, such as Hafren Dyfrdwy and Dwr Cymru present significant opportunities for delivery, building on previous and current partnerships completing work with eel habitat in three wetland reserves in North Wales and within the Elan Valley and at the Lake Vyrnwy Estate.
- Summit to Sea is a partnership project exploring innovative approaches to working for nature at landscape-scale. The Summit to Sea project is working in an area of Mid-Wales, from the rugged uplands of the Cambrian Mountains, down through wooded valleys to the Dyfi Estuary and out into the marine-protected areas of Cardigan Bay.

**Q. Marine Environment: How can river basin management plans better focus on managing pressures in the marine environment using a source to sea approach to deliver improvements to estuarine and coastal water bodies?**

One respondent welcomed that the opportunity catchments applied the source to sea approach to catchment management, and identified estuarine and coastal water bodies where a sustainable management approach to water will be progressed. Another respondent felt that at the present time they could not think of any better way that the RBMPs could focus on managing pressures in the marine environment than using a source to sea approach to deliver improvement to estuarine and coastal water bodies.

A number of pressures for the marine and riverine environments were identified by respondents that they felt needed to be tackled including;

- Pollution from agriculture or CSO's.
- Dredging silt from the rivers to prevent pollutants going down rivers and out to sea.
- Scallop dredging in Cardigan Bay.
- Remove all old "disused" outfalls to the sea.
- Focussing priorities on river environmental improvement will contribute towards the marine environment. Opportunities should be identified for stakeholders in the riverine environment to work with the marine environment and explore shared opportunities for delivery. In particular the Tidal Dee would benefit from this approach.
- Coastal INNS coming from estuarine sources Invasive Non-Native Species (INNS) – INNS are a persistent issue affecting wetland habitats in Wales, where they can outcompete vital vegetation, increase erosion and cause sedimentation due to their perennial lifecycle. We need to see a co-ordinated and catchment scale approach to manage INNS from NRW, to protect wetland and coastal habitats from INNS arriving through the river and estuary systems.

One respondent identified that there are several additional pollutants emerging as threats to our freshwater systems with potential knock on effects to the marine environment, however the extent and impacts of their presence in our freshwater is largely understudied. This includes:

- Plastic pollution in freshwater systems
- Pharmaceutical residues

Agricultural pollution and excess nitrates was identified by one respondent as contributing towards poor water quality in Wales' rivers and perpetuating the degradation of aquatic and terrestrial ecosystems. They also commented that this pollution negatively affects bathing water quality and drinking water sources. They recommended that water quality monitoring should be done on bathing waters throughout the whole year so that pollution issues stemming from the land would be identified and remedied sooner.

Another respondent felt that estuarine and coastal water bodies are directly impacted by water quality issues such as nutrient levels and chemicals in a number of ways, and there is need for better join up between groups and initiatives for managing the marine environment and river basin management activities. The marine protected area steering group would be a key group to engage with on these matters and would merit further funding for coastal and water-quality issue projects.

One respondent mentioned that ongoing and additional support is required to assist local planning authorities in relation to phosphates. NRW's phosphate planning guidance should also apply to marine SACs.

Another respondent mentioned that there should be a marine conservation area in Carmarthen Bay. They felt that there should be a stop to all netting, both drift netting and netting near to the estuaries. However another respondent felt that there has been much disagreement about the value of Marine Conservation Zones and the potential implications for local businesses that rely on fishing trips and sea related activities. They observed that the growth of wind farms at sea could provide a great opportunity to set up such zones with minimal public objections.

One respondent asked about the results of installing Event Duration Monitoring at all Combined Sewer Overflows (CSOs) in Wales and whether this could be used to prioritise required improvements to the waste water systems. They also pointed out that there was no mention of the "North West Marine Plan" in the 'Dee RBMP

**Q. EU Exit: Tell us your views on the potential challenges and opportunities for delivery of river basin management plans after EU exit**

Many respondents made the comment that there was concern over a lack of funding for environmental projects once we leave the EU. It was recognised that NRW will need to work with others to apply political pressure for increased and adequate funding or look elsewhere, or these projects would be at risk. It was also felt that the loss of multi-year funding, such as DeeLIFE, LIFE blanket bog project and the EMFF, could not be adequately fulfilled by annual budgets and that to have a real impact on the outcomes and measures identified in the RBMPs, long term multi-year funded grants need to be created but there needs to be flexibility in the timing of receiving grants within the year, short application windows and tight delivery timescales limit the ability of interested parties to establish partnerships and constrains opportunities.

One respondent felt that there needs to be significant funding identified to enhance and protect our Protected Sites. They also expressed concern about the perceived status and relevance of EU Protected Sites, in the sense that their importance may get eroded. They noted that there also needs to be a step change in species monitoring if we are to understand and address the issues affecting nature and demonstrate how successful interventions are. NRW currently does not monitor Wales's population of European Eels, despite it being critically endangered and protected. Brexit presents Wales with a unique opportunity to implement a Green Recovery.

Some respondents felt that subsidies should only be paid to farmers where they are linked to environmental improvements so that agriculture has a place for our wildlife. Nature-friendly farming can help reverse declines in biodiversity and water quality.

One respondent felt that leaving the EU brings a high degree of market uncertainty and disruption to the farming and land management sectors. How these sectors respond to new trading, regulation and support risks and opportunities will impact the water environment, for better or worse. The EU exit and transition away from the Common Agricultural Policy is a once in a generation opportunity to shape a more sustainable future. They felt that the Agriculture (Wales) Regulations and its sustainable land management scheme will be critical to the delivery and success of the RBMPs.

Another respondent expressed concern that the decision to leave the EU will have significant impacts on UK farmers. Future trade deals could still impact on business viability which could put pressure on income which in turn could impact in ability to invest and the way in which they farm. In addition one respondent noted that agricultural reform post Brexit is a significant risk to the quality of the water because agriculture and forestry are the dominant land uses in Wales.

As one respondent pointed out the potential challenges and opportunities for the delivery of RBMPs after the EU exit, are that the standards should be no lower, but better than than the proposals put forward by the EU.

A point was made by one respondent that water customers should not have to bear increasing costs for pollution caused by other sectors. NRW and Welsh Government need to ensure that all sectors are empowered to tackle the pollution that they are responsible for.

Additional opportunities made by one respondent included;

- RBMPs are intrinsic to the delivery of the WFD, whose targets exist until 2027 but due to the UK's exit from the European Union, Wales will not be legally bound to adhere to follow-on plans for the WFD. They felt that NRW should be pre-emptively preparing for how water quality goals will be put into law and delivered.
- NRW and the EA need to produce a clear monitoring and enforcement plan to stop pollutants from entering our waterways.
- Wales has an opportunity to show global leadership on nature-based solutions and climate-friendly land management in the run-up to the UK Presidency of UNFCCC COP26, particularly considering the conference will shine a spotlight on the role of nature in tackling the climate crisis. By committing to bold environmental policies, supported by appropriate funding, Wales can position itself as a leader on climate and biodiversity action.

### **Q. SEA Screening Determination: Do you have any comments on the Strategic Environmental Assessment screening determination?**

Of those respondents that answered the question, the majority agreed with the SEA screening decision. One respondent disagreed with NRW's reasoning that the draft RBMPs will not generate any new or additional significant environmental effects, and therefore doesn't require an SEA. They considered that NRW's current position seems to be that the objectives and the measures contained within plans will fail to engender significant environmental benefit. They advised that the RBMP must set us on the most ambitious route in order to support the achievement of GES and GEP for as many water bodies as possible.

### **Q. Habitats Regulation Assessment: Do you have any comments on the draft Habitats Regulation Assessment?**

The statutory consultees were supportive of the conclusions of the draft HRA. One respondent acknowledged the process taken to screen the identified measures for unintended consequences on European sites and agreed that the measures screened in need further investigation. In principle they supported NRW's decision to defer the HRA to lower tier plans and projects, where a greater level of detail will be available to inform the HRA, mitigation and compensation. But felt that these HRA's must establish that there are no unintended consequences of the implementation of the RBMP on European sites.

The approach identified in Section 7.3 of the assessment and the details provided on generic mitigation was welcomed by one respondent. They acknowledged that the detail within Table 3 will be helpful but with the accepted recognition that other mitigation will be required, which they felt was not possible to identify at a strategic level. They highlighted that the draft document did not identify a monitoring programme of this approach which might be useful as lower tier programmes and projects are developed to ensure the wording of generic mitigation remains appropriate.

Some respondents felt that the HRA was fairly long and repetitive, producing a 'wish list' of (measures). Another respondent noted that it was good to see a lengthy list of proposals but that NRW lack the funding to provide sufficient enforcement and were concerned that the targets are unobtainable with such limited funding.

## **2.2 General comments**

Some respondents did not answer the specific questions in the consultation but made general comments on the following topics/issues;

### **Diffuse Pollution/Pollution Incidents**

Many were concerned about the spreading of slurry and run-off from chicken farms. Some respondents mentioned the impact to both the Taf and Clwyd rivers as a result. It was felt that more needs to be done on enforcement and regulation to ensure that these issues are tackled. One respondent felt that as an organisation they are currently hindered in trying to progress on nutrient management systems with farmers in Wales, due to lack of NRW guidance and support and believe that NRW are not currently succeeding in managing pollution from rural areas.

One respondent had concerns regarding NRW current position with regards to planning applications. Rural agricultural development is continuing due to NRW failure to account for HRA assessments as part of planning applications, to not give due regard to nutrient management and compliance requirements and to not consider slurry management appropriately. Local authorities are currently responsible for enforcing compliance of nutrient management plans through planning yet they have no skills or knowledge in this area.

Two respondents mentioned the issue of phosphate. One mentioned that NRW has published interim guidance for LPA's on the impact of phosphates on riverine SAC's but that further work is needed to understand what the guidance means in principle, policy and detailed application.

Several respondents raised concerns over the issue of sewage pollution and CSO spillages polluting local river systems and felt that more action is needed to reduce this, including monitoring. It was also felt that more could be done to promote SuDS, reduce misconnections and tackle pollution from highways.

One respondent commented that whilst they understood the purpose of CSOs are to discharge untreated human sewage and wastewater when overloaded due to extreme conditions, to avoid sewage flooding our streets and homes. They felt that CSOs are being used as regular sewage disposal outside of exceptional conditions e.g. extremely high rainfall.

Another felt that there is strong evidence that CSOs are operating outside of permit conditions across Wales. Further investment cannot be secured by Welsh Water unless NRW takes a stronger regulatory position. They also have concerns that this outcome is significantly underestimated at waterbody level and that the operation of CSOs is far higher than currently understood. To achieve this outcome, all unpermitted and deemed consents should be permitted and monitored by NRW against permit conditions.

It was felt by another respondent that there should be emphasis on a better understanding around what is acceptable to be included as evidence in the river basin management planning process as well as the SoNaRR and Area Statements. They are concerned that there is a lack of evidence and understanding of rural diffuse pollution and believe more research is needed on source apportionment and to understand other influences such as sewage discharges and domestic septic tanks. They have concerns that the extent of diffuse pollution from agriculture could be overstated as it is difficult to "confirm" the source without detailed monitoring data. They ask whether there is sufficient monitoring to identify the activities responsible for diffuse pollution in different catchments, and whether it will be possible to monitor the improvements due to rural diffuse pollution measures identified in the third cycle plans. They are concerned that measures have been selected to reduce diffuse pollution from agriculture without full details as to the cause of the pollution.

One respondent raised concerns over the number of pollution incidents and it was noted by another respondent that there is a long running query over toxic waste residues at the ex Monsanto site in Cefn Mawr that has the potential to leach into nearby watercourses and that no mention of this or other such cases has been made in the RBMP.

## Dredging and Maintenance

A number of respondents felt that dredging was necessary in rivers to improve water quality, one respondent mentioned that in the U.S. tests proved that better drainage improves water quality, as flooded land washes pollutants (nitrogen, phosphates etc.) straight into water courses. Land drainage through tile (plastic) drains filters the water to drinkable quality. So much so that the U.S. EA gives out grants for these measures .

## Classification

One respondent noted that within the RBMP, there will be further updates to classification information. Whilst they agree with the principle of the 'one out all out' rule, they believe that the overall status can mask progress and would therefore like to see the breakdown of each element and those not achieving 'good or better' to help drive change. Similarly, for the final classification of groundwater they would encourage a more nuanced approach to be taken instead of an overall 'good or poor' status to help target action where it is most needed.

## Regulation

One respondent welcomed the introduction of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 which align Wales with other parts of the UK and include the conversion of previously good practice guidelines into a set of clear and consistent mandatory measures. However, felt that the regulations alone will not prevent pollution and would like clarity on how NRW intends to monitor and enforce them. They commented that over the third cycle, farmers focus and resources are likely to be channelled entirely on the process of securing compliance with this piece of regulation irrespective of its contribution to WFD objectives which has not been assessed.

## Funding

A number of respondents mentioned that lack of funding was an issue. It was felt that there are insufficient enforcement staff to monitor and enforce breaches And that finances, or lack of them, have a major impact on NRW's ability to perform their duties.

## HEP Schemes

One respondent commented that they opposed the use of HEP schemes on local rivers, such as the Afonr Elwy and its tributaries. They opposed the planning permission of these schemes. They oppose the idea of setting up tidal basins in the local area, as this will affect migratory fish, and they are also concerned about tidal power schemes.

Another respondent agree that NRW needs to deliver a programme of HEP scheme inspections to ensure that they are operating in compliance with obstructions and impoundment licences, and to take appropriate enforcement action when they fail to do so.

## Omissions

One respondent noted that it would be worth referencing the EA 2021 RBMP: Plastics Challenge document linked via the 'Overview Annex for England' in the Dee RBMP. Also the The Marine Litter policy ML-1 in the North West Marine Plan

Another respondent mentioned that they do not believe that data already collected by Afonydd Cymru, funded by NRW, for the Fisheries Habitat Restoration Programme has been considered or utilised as part of the WFD programme.

### River Basin Planning

One respondent felt that given our 'place based approach' the delineation of the RBD needed to change accordingly, as the nature of the catchments across Wales differ considerably. Another mentioned that the fact that the boundaries of River Basin Districts and Area Statement do not align adds a further layer of complexity as does the fact the River Basin Districts also cross the Wales-England border.

Another mentioned concern over the fact that only 44% of rivers in Wales are achieving good ecological status under the WFD 2018 interim classification. They noted that 45 water bodies have an objective of less than good status and whilst, 491 water bodies (86%) have an objective of good status by 2027, there is an expectation that only 240 (42%) are likely to achieve this. They recognise that NRW have identified within the plan a list of water evidence needs and urge that addressing these current gaps in data will be critical to the delivery of targeted and effective measures for water bodies, and ultimately the success of the RBMP.

One respondent thought that more must be done now we have left the EU. Our track record is not good on improvements to water quality, with very few rivers reaching good status.

Another respondent felt that overall, the legislative context for river basin management planning is increasingly complex and ambiguous with NRW now leading the development of multiple plans, via multiple processes at a range of spatial scales. They also felt concerned that progress towards good status is being masked by the 'one out all out' rule. This rule presents a more pessimistic view of the current status and they believe NRW should do more to communicate the detail of water quality status in Wales beyond the headlines.

One of the main difficulties that they have with the RBMP process is the high-level nature of the documents. For the RBMP process to engage individuals, as is required with the agricultural sector, new approaches towards engagement are needed. This has to be locally relevant, tailored advice instead of generic information about "reducing diffuse pollution at source" or "reducing diffuse pollution pathways". This platform does not exist currently and the draft Plans lack a focus on meaningful engagement with farming.

They further felt that with the winding up of the River Basin Management Liaison Panels it is unclear how WFD objectives will be taken forward. Whilst they are pleased to be represented at a key number of NRW fora, they identify these groups are operational at a strategic level not necessarily suited or equipped to delivering action at the catchment or waterbody scale.

### Flooding

One respondent felt that there needed to be better flood management and that land needed to be managed more sympathetically, flooding, food production, water quality and wildlife including fish need careful management and that everyone is responsible. This

includes farmers, NFU, developers, local authorities, anglers, environment groups NGO's and the whole community.

### Other

One respondent mentioned that it is widely recognised that land management, and in particular diffuse water pollution from agriculture, has a large impact on the ability of catchments to achieve the target WFD status. They recognise the importance of farming to the rural economy and the importance of ensuring farmers can be successful but would like to see the full value of agriculture considered in terms of the impact on water quality and other ecosystem services leading to natural capital being created or eroded by activities, as well as the financial value of the activity. They also felt that we need to see a concerted focus on driving the circular economy in order to ensure environmental improvements are driven in a sustainable way.

One respondent felt that implementation was required for agreed measures under Review of Consents to protect river flows in Wales and were disappointed that the outcomes from this process were still not in place.

The National Trust commented that they would welcome the opportunity to join the Wales Water Management Forum to share learnings and play our part in delivering for Wales.

One respondent mentioned that as anglers they are committed to assist in any way they can to improve the water quality and habitat environment. They felt that NRW and Welsh Government need to ensure that their concerns are taken on board.

Another respondent asked about the septic tank guidance and if there has been any evaluation on how effective this has been.

One respondent pointed out that we should not be referring to EU Directives in the RBMPs and that references to N2K sites should be replaced with National Sites Network.

Further comments were received on some of the projects and wording mentioned in the draft RBMPs.

## **3. Next Steps**

We are pleased to see that from the responses, a number of organisations and individuals have given their support to the Dee and Western Wales RBMPs, and their willingness to help deliver the improvements to the water environment is welcomed. Responses to this consultation will be used to inform the final RBMPs which will be published on our website in July 2022.

There is a lot to do, and to deliver the improvements we all want to see we recognise that new sustainable and joined-up solutions must be found. In Wales the proposals in the Environment (Wales) Act 2016 will help us focus on a more integrated approach to natural resource management, looking at the root causes of problems and working with stakeholders to find appropriate solutions. Our goal for the River Basin Districts is not simply to deliver the requirements of the WFD Regulations 2017, but to integrate planning and delivery of objectives for Protected Areas where possible.

We cannot deliver the necessary objectives by legislation and guidance alone – we need to work together with our partners in sharing expertise and developing common outcomes we can all work towards. Land managers, farms, businesses, industry, water companies, local authorities, planners, governmental bodies, non-governmental organisations, and individuals must commit to changing our relationship with water and the environment it supports.

From the responses received it is clear that there are many ongoing projects/ initiatives and there is an opportunity to use these to develop the means by which the RBMPs will be delivered. This can be supported by the continued work of the Wales Water Management Forum, and at a local level, there will continue to be catchment approaches, partnership projects and cross sector working. We look forward to working with stakeholders in the coming years to further develop ideas, actions plans and solutions.

For further information you can contact:

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Phone 0300 065 3000

Data protection prevents us from naming individuals who have not given permission for their details to be made public. A copy of the responses is available on request.

## Appendix 1 – List of respondents

NAME	SECTOR	River Basin District
2 Individuals	Various	Dee
Flood Protection Society	Land Management	Dee
Campaign for the Protection of Welsh Fisheries x 2	Fisheries	Western Wales
Cymdeithas Pysgotwyr Seiont, Gwyrfai & Llyfni	Angling	Western Wales
Whitland AA and Whitland Walking Group	Angling	Western Wales
Rhyl and St Asaph Angling Association	Angling	Western Wales
Wrexham CBC	Local Government	Dee
Carmarthenshire Fishermen's Federation	Fisheries	Western Wales
Llanboidy Community Council	Community Group	Western Wales
National Trust Cymru	Conservation	Western Wales and Dee
Cambrian Mountains Society	Conservation	Western Wales
NFU Cymru	Agriculture and Rural Land Management	Western Wales and Dee
RSPB Cymru	Conservation	Western Wales and Dee
Pembrokeshire Coast National Park Authority	Local Government	Western Wales
Afonydd Cymru	Conservation	Western Wales and Dee
Consumer Council for Water	Water Industry	Western Wales and Dee
Marine Management Organisation	Other	Dee
Welsh Dee Trust	Conservation	Dee
NFU North West	Agriculture and Rural Land Management	Dee
Middle Dee Catchment Partnership	Conservation	Dee
United Utilities	Water Industry	Dee
Hafren Dyfrdwy	Water Industry	Dee

Published by:  
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