

1 September 2022

Dear Steve

DWMP Consultation Response

Afonydd Cymru is the umbrella body for rivers trusts in Wales. We act in an advocacy role to Welsh Government and Natural Resources Wales, and currently act as Technical Advisor to the Welsh Government Taskforce for Better Water Quality. We are grateful for the opportunity to comment on the Drainage and Wastewater Management Plan (DWMP) and hope our comments may support revisions and development of the DWMP.

We commend Welsh Water on the extent of detail and provision of information that has been given during the consultation. We also recognise Welsh Water objective to meet the engagement requirements outlined in the DWMP process. Despite all these efforts, the consultation is complex and will be difficult for stakeholders to input and respond to. We would therefore encourage continued consultation and development of the Plan with others.

Our overall comments are as follows:

- Delivery under the DWMP is imperative to achieving an overall aim to reduce sewer overflow spills to our river and meet agreed targets under the WG Taskforce to remove all ecologically impacting CSOs by 2030
- To protect rivers across rivers, substantial excess drainage must be removed from the overall catchment system to allow as much capacity within our existing sewerage infrastructure. This therefore requires consideration of sustainable surface water separation.
- We are concerned that the success of the DWMP is very significantly linked to potential requirements for revised Welsh Government policy and legislation and we do not believe this has been reflected into timescales within the Plan. We are also unclear whether this is recognised and whether discussions are underway to support this.
- It is not that clear that the DWMP is only part of a wider investment programme Welsh Water is developing. We believe therefore that in addition to the funding identified as part of the DWMP additional funding will also be secured to deliver 1) improvements to sewer overflows and 2) resolution of named assets under the National Environment Programme that have been identified as impacting the WFD status of rivers and have been identified in the River Basin Management Plans. It would be useful to ensure this is clear in future versions of the DWMP. We would expect much greater detail linked to be available by the next publication of the DWMP given the timings of the Periodic Review process.
- The supply and demand balances are not clear as presented in the DWMP and should contain numbers or as a minimum a colour chart to reflect scale against colour graduation. It is important to share how big the supply demand balance failure is so that consultees can understand the scale of the problem.

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- Welsh Water should consider carefully the makeup of the Project Boards and future engagement process. The Boards must reflect a range of drainage interested parties as well as eNGOs to ensure that the focus of the work is concentrated on sustainable separation and not more traditional drainage and wastewater solutions.
- There is significant benefit from delivery of surface water separation to other sectors and other investment deliverables which is currently not being considered as part of the DWMP and therefore is not considered as part of the overall investment programme in Wales. As examples of this: 1) delivery of the DWMP would have benefit to deliverables under the Water Resource Management Plan in terms of direct per capita consumption reductions but also the potential storage and attenuation of water which would reduce water consumption by local authorities. It should be assured that there is alignment between both plans but also that further synergies for scheme delivery are explored. 2) delivery of the DWMP has a direct benefit to the wider wastewater and sewer overflow programme. There is significant potential to drive efficiencies in the overall Welsh Water investment plan by delivery of schemes that achieve multiple drivers. 3) The solutions under the DWMP will require solutions to be developed with local authorities and have direct benefits to the Wales Flood Management programme. All of these would have a direct benefit to other areas not just of Welsh Waters investment programme but to drainage, flooding and wastewater programmes across Wales in other sectors. Welsh Water should explore how to maximise these efficiencies. And finally, 4) delivery of surface water separation could and should have significant benefits to the water quality of our rivers and removal of nutrients and other pollutants. This could have significant benefit on many other drivers and investment requirements.

All of these demonstrate that it is not always a matter of additional investment and higher cost and there are efficiencies to delivery across Wales if these synergies were explored.

Specific comments:

- There seem to be very few identified schemes for AMP8, including on SAC rivers, in fact all funding for delivery on the ground seems to be deferred to AMP9.
- A number of solutions (highway disconnection, infiltration, domestic disconnection) are identified but are not described even at a high level in the Plan. Further detail should be provided so that it is clear what is meant by the schemes.
- There is significant reliance on highway disconnection as a solution. We do not believe Welsh Water has any legal powers to undertake this but solutions are identified as early as 2030 to have an effect. We are not aware that Welsh Government are currently considering these powers, nor that any partnership has been undertaken with local authorities to support this. We are therefore very concerned on the reliance of this as a solution, when Welsh Water has no ability to implement it.
- In some catchments, reduction of personal water usage has come out as a significant solution to resolving the issues in the catchment. A reduction to 100l/h/d is proposed. The Blueprint for Water PR24 also supports this. We would question why lower levels of per capita consumption have not been considered? However, again, achieving this would require Welsh Government planning policy and legislation, and significant retro-fitting by Welsh Water. Given that area summaries show this having an effect from 2025, we consider delivery of benefit is too early and that significant policy work must be delivered in advance

to achieve this. Further, we do not believe Welsh Water has considered the proportion of properties on private water supplies as part of the modelling undertaken. This would significantly impact the proposed outputs at Area level.

- We absolutely support delivery of sustainable, water separation schemes. These schemes will take longer to deliver but have the potential to deliver far greater benefit to the environment. Therefore, the timelines for such delivery need to be realistic.
- As raised with Welsh Water previously, reference is made in the DWMP to Biodiversity Action Plans (BAPs). The legal requirement under Environment Act (Wales) 2016 is for a Biodiversity Plan, or specifically for a Plan to Biodiversity and Resilience of Ecosystem Duty. It is not clear how Welsh Water are accounting for priority species and habitats under their current plans nor how this legal duty is being met.
- We welcome the utilisation of SEA and HRA to the DWMP. However, we are very concerned by the negative outcomes identified by schemes which we feel are beneficial to the environment. This potentially may cause schemes which would have significant benefit be excluded. Insufficient detail is provided to enable us to clearly understand what has driven this negative impact.

Afonydd Cymru hope that you find the comments useful in the development of a revised DWMP and to move investment forward in this area. We would be happy to discuss any of these elements further if it would be helpful to develop the plan further.

Kind regards,



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CEO