



WEST WALES RIVERS TRUST

YMDDIRIEDOLAETH AFONYDD
GORLLEWIN CYMRU

Harriet Alvis
West Wales Rivers Trust
C/o Natural Resources Wales
Llys Afon, Hawthorn Rise
Haverfordwest
Pembrokeshire
SA612BQ

Pembrokeshire County Council & Pembrokeshire Coast National Park Authority
via: Land Use Consultants (LUC)
pembrokeshireGI@landuse.co.uk

Re: Green Infrastructure (GI) Management Study

Dear Sir/Madam,

I am writing to you from West Wales Rivers Trust (WWRT) in response to the current Green Infrastructure (GI) Management Study exploring strategic plans for Pembrokeshire's GI network.

WWRT was formed in 2017 following the amalgamation of the Teifi and Pembrokeshire Rivers Trusts. The Trust now covers the entirety of West Wales, including the counties of Ceredigion, Carmarthenshire, Pembrokeshire, Swansea and Neath Port Talbot, where we aim to protect, restore and enhance rivers, lakes and wetlands for people and wildlife. Our ethos focuses on working with local communities to deliver long lasting and cost-effective solutions for river issues while educating and empowering people to take their own steps to improve our water environments. We pride ourselves in getting our feet wet and our hands dirty to get things done, including water quality, habitat, fish passage and natural flood management projects.

Our catchment covers all of the 11 settlements incorporated in the plan and therefore we have chosen to write this letter as a form of an overarching response. We were pleased to see comprehensive plans for these settlements, in particular the following:

Town	Plan
Haverfordwest	<ul style="list-style-type: none">Floating reedbeds along the stepped approach to the river at the Riverside Shopping Centre to soften the channelised edge of the river, enhance water quality and provide riparian habitats.Extending areas of wet meadow along the floodplain. including the inclusion of wader scrapes and areas of wet woodland
St Davids	<ul style="list-style-type: none">Floodplain reconnection on the River Alun upstream of St Davids
Fishguard	<ul style="list-style-type: none">Retrofitting rain gardens, street trees and permeable paving within existing urban area
Narberth	<ul style="list-style-type: none">Riparian tree planting and the creation of wetland scrape
Saundersfoot	<ul style="list-style-type: none">Exploring opportunities to extend riparian tree planting along the two watercourses to the west of Saundersfoot and additional field margin buffers on agricultural land

West Wales Rivers Trust / Ymddiriedolaeth Afonydd Gorllewin Cymru
Tel 07518662884 Email: harriet@westwalesriverstrust.org
Registered Charity Number 1105663

Tenby	<ul style="list-style-type: none"> • Floodplain reconnection on 'The Ritec' above the town centre
Pembroke	<ul style="list-style-type: none"> • Nature-based solutions to tackle underlying causes of nutrient inputs into Pembroke Mill Pond

While we support the above actions, we would welcome larger scale and more widespread catchment-based interventions to improve river habitat and water quality, as well as addressing issues with flooding from surface and fluvial flows. This includes the following recommendations in all catchments:

1. Explore opportunities for **fish passage and in-stream habitat improvements** on all rivers within Pembrokeshire, of which none were noted in the proposed management interventions.
2. Investigate opportunities for increasing the spatial distribution of **Sustainable drainage systems (SuDs)** for stormwater management in all catchments to improve both flood risk management and water quality. Raised planters are mentioned frequently in the plan and do have some value, however, wherever possible, runoff should be managed on the surface.
3. Investigate **Natural Flood Management (NFM)** opportunities in the upper reaches of all rivers to reduce and/or delay downstream flood peaks by attenuating and slowing water through a range of interventions that increase water storage, increase soil infiltration and slow water by increasing resistance to flow.
4. **Sediment risk analysis mapping** for the entirety of Pembrokeshire and the delivery of a programme of **agricultural improvements** to capital infrastructure and land management in identified high-risk areas, with the aim of improving water quality. NB. This will also contribute to addressing Special Area of Conservation Phosphorus compliance failures in the River Cleddau.

WWRT would welcome conversations on how we can feed into wider plans. We have a great deal of experience in identifying opportunities for and delivering the above recommendations, as well as those river and wetland interventions included in the proposed management plan. Furthermore, WWRT and Afonydd Cymru have created a Fisheries Habitat Restoration Plan with wider improvement opportunities for the Eastern and Western Cleddau rivers and the River Nevern.

Please feel free to get in touch if you would like further information on any of the above points raised.

Yours sincerely



Harriet Alvis, Chief Executive Officer