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Response to Water Resources West Consultation

Afonydd Cymru is the umbrella body for the six rivers trusts in Wales, providing advocacy to Welsh Government and Natural Resources Wales (NRW). Our vision is for clean, healthy rivers for every community in Wales. This vision is dependent upon the management of our water resources in Wales, ensuring that low flows are protected during drought periods and that rivers are protected and managed during periods of high rainfall. Our rivers are an intrinsic link between land and sea and are fundamental to WG commitments from COP15 to restore our natural resources across Wales.

Overall, the proposals put forward under the Water Resources West (WRW) Consultation result in minimal impact to the rivers as they flow through Wales. We will comment separately on both Dŵr Cymru Welsh Water and Hafren Dyfrdwy Water Resource Management Plans (WRMP), but both water companies have minimized the use of supply side options to meet supply-demand balance deficits and are promoting enhanced leakage and demand management. We would draw your attention to the following comments we have made to Welsh Water WRMP:

1) We expect to see all companies drive a per capita consumption requirement of 110l/h/d.
2) Whilst we are supportive of Welsh Water's proposals for meeting a 50% reduction in leakage targets we believe that there is scope for further ambition, based on current rates of leakage. Therefore, whilst the current supply-demand deficits perhaps do not drive this need we would expect Welsh Water to deliver further leakage reductions should their deficits increase, for example, during a re-assessment in 2025-2030.
3) All companies demand management is very dependent upon delivery of UK water labelling being in policy by 2025. We would expect both companies to provide an assessment of an alternative delivery should this not be the case. We note that these envelopes have been provided in the Water Resource West consultation.

River Severn SAC

One of the major schemes proposed by WRW is the Severn to Thames transfer. This option will require additional water to be released from the Vrynwy reservoir, transported via the Afon Vrynwy to the River Severn, for re-abstraction at a new abstraction point at Gloucester. It is not clear from the information provided whether the releases from the Vrynwy reservoir are within the current licence. We would ask WRW to be clear and transparent on this.

In 2008, a Habitats Directive Review of Consents (HD RoC) process was undertaken by both NRW in Wales and the Environment Agency (EA) in England. This process would have been based upon current licensed abstractions at that time and would have assessed whether the current and permitted abstraction rates were sustainable to ensure protection of the riverine SAC requirements to meet the Habitats Directive Ecological River Flow (HD ERF). In England, the EA is considering

further reductions for sustainability purposes. We expect any river abstraction to be assessed to ensure that the Competent Authority can ensure no adverse impact to the SAC.

We would expect to be provided with hydrological modelling of the Afon Vrynwy and the River Severn to ensure that the flow regime of both rivers was not compromised by the transfer proposal. This modelling should demonstrate that at all times the HDERF was protected throughout the rivers. This includes the Afon Vrynwy, as a waterbody which supports the downstream River Severn SAC. Furthermore, modelling should ensure that the protected habitats and species of the River Severn SAC are protected. In particular, the flow regime must support the migration of fish. The regime therefore must not only ensure HD ERF is met but also that the releases do not artificially change the regime of the river in a way that inhibits their migration. We would expect as a minimum an environmental destination to be considered which would allow the release to be ecologically managed such that spate flows are protected at all times and the river flows provide natural flow variability.

Whilst we note that impacts have been recognized in the Habitats Regulation Assessment and the Water Framework Directive Assessment, we have no clarity in the information provided as to the extent of the impact to river flows in the River Severn SAC. Meeting not just the HD ERF, but also providing natural flow variability and spate releases for the River Severn would also support the WFD requirements and provide enhancement as required under the Environment Act (Wales) 2016 for biodiversity. This must be provided as a minimum to ensure no adverse effect to the SAC.

We note that the transfer option will also require new abstractions on rivers in England to replace water from Vrynwy. These rivers are in England and therefore outside of Afonydd Cymru remit, however, we would be concerned if abstractions from poor quality rivers in England were being used to support flows in the River Dee, or support water abstraction for water supply. The water quality of the proposed new water source should be considered further.

WRW Strategy

With regards to non-public water supplies, in the WRW region, this comprises agriculture, Canal & Rivers Trust and industry. Whilst we recognize that all these industries provide a critical service, we are concerned that the WRW strategy has not considered them as part of options to mitigate against future demand needs. We would expect all demand and leakage options to be prioritised over new supply options.

Firstly, in 2022 large areas of England and Wales declared a drought and river flows fell to their lowest ever recorded in many areas. During this time, it became evident that a number of sectors were very dependent upon their abstractions, so for example in Wales, the agricultural sector in some cases ran out of water supply and either abstracted more or directly from a river, or were forced onto mains supply. There is also evidence that in a similar way, canals also struggled with low flows and further support was taken from river sources. We do not consider that the impact of the change in water resource behaviours during critical periods is sufficiently understood and this should be further analysed to ensure that peak demands on our water resources account for this. Table 15 Zero Recent Actual Licence should be updated as part of this assessment.

Secondly, whilst water companies cannot put forward options to strategically manage other sectors water usage, we would expect a Regional WR strategy to consider this. Water companies are regulated under a 'fair share' principle where they are required to invest to protect the environment from their 'fair share' impact only. The overall management of the catchment and a Strategic Regional WRMP should, however, put forward proposals to manage *all* water resources in the catchment, and this should include the non-public water supplies.

Currently, we see no water resource planning being done in other sectors to the same extent as in water companies. We accept that this process is complex and difficult to apply, but this is exactly why it should be considered through a regional strategy. Much of the deficit which drives the WRW WRMP is because of sustainability options applied to water company abstraction licences. We do not see the same level of review being applied to other sector abstraction licences. Indeed, the 2008 HD RoC excluded some of the sectors as they were, at the time, exempt from licensing or their licences fell under thresholds. We would expect the regulators (EA and NRW) on both sides of the border to ensure that these sectors are also not causing impact to ecological river flows, and we expect action to be taken on those sectors where necessary. This process is critical because, as it stands, the demand for water considered in all regional WRMPs is potentially artificially high and if fairshare principles were applied across all sectors, more efficient use of water would be driven. This would reduce the overall supply-demand balance deficit and would reduce the impact of new supply options in one geographical area to support another.

As part of this assessment, we expect both EA and NRW to ensure that there is no deterioration in WFD status for either river as a result of the regional strategy being implemented. We are not clear currently how any assessment for no deterioration is embedded in the WRW strategy.

More importantly, not considering all sectors limits the environmental destinations of the current WRW WRMP. There are opportunities to deliver mitigation to the other sectors, particularly the agricultural sector, which would support a multi-benefit approach, for example supporting the delivery of farm winter storage ponds, improving land management to support drainage and retention of soils which would not only benefit water resources but also support measures under the Sustainable Farming Scheme in Wales for enhanced payment to farmers. These type of catchment mitigation schemes are crucial to meet WG requirement for Sustainable Management of Natural Resources (SMNR).

West Country WR Strategy

We have noted that the West Country WR Strategy has indicated that the West Country area requires no regional transfer support. We find this surprising given the water resource issues in Cornwall and Devon this year. We raise this as the only region which West Country could connect with for a long-term future supply would be the regional WRW area. This would therefore present implications to the current WRW strategy and we would urge further work to ensure that this is correct.

We hope that these comments support further development of the WRMP for the WRW region.

With kind regards,

Gail Davies-Walsh, CEO