

Number: **WG24128**



Llywodraeth Cymru
Welsh Government

www.cymru.gov.uk

Welsh Government

Consultation – summary of responses

A Water Strategy for Wales

Date of issue: **January 2015**





Digital ISBN 978 1 4734 2858 4
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Overview

This document provides a summary of the responses received by the Welsh Government to the consultation on a Water Strategy for Wales.

Audience

Water regulators, the water industry, Local Government, National Park Authorities, private individuals and business, trade associations and representative bodies, environmental and conservation organisations, Public Health organisations

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1. Introduction

The Water Strategy for Wales consultation was launched on 7th April 2014 and was open for responses until 4th July 2014. A total of 29 questions were set out within the consultation for response and an online form was provided for ease of return.

The final Water Strategy will set out the long-term policy direction for Welsh Government in relation to water. The intention is to balance the needs of a sustainable and resilient environment with the need to ensure that there are sufficient, reliable and affordable water resources and waste water services available to encourage sustainable growth and job creation into the future.

Key to our proposed method is the development of a more integrated way of managing water; this will form part of the Welsh Government's wider approach to natural resource management. More integrated management of our water resources will help to promote the coordinated management of water, land and related resources. This in turn will enable us to maximise economic and social benefits in an equitable manner while protecting vital ecosystems and the environment.

The 29 questions within the consultation covered the whole of the Welsh Government's future policy direction for water, broken down across seven priority areas.

To assist the development of this strategy, we organised a series of workshops and sought advice from many individuals and organisations. Their expertise and knowledge in water management were invaluable in informing the consultation proposals.

Overall the majority of respondents and workshop attendees agreed with the broad direction and priorities set out in the Water Strategy for Wales, where an opinion on this direction was provided. Many of the responses received focused on suggesting further areas for action and raising specific issues, whilst not raising concerns over the broad policy.

All responses have been considered fully and the analysis of these responses will inform the final development of the new Water Strategy for Wales.

Below is a summary of responses, broken down into chapters as set out in the consultation document with themes highlighted where respondents showed a high level of consistency.

The Welsh Government would like to take this opportunity to thank everybody who responded to the consultation and all those who attended the strategy workshops held during the development of the consultation document.

2. Summary of Responses

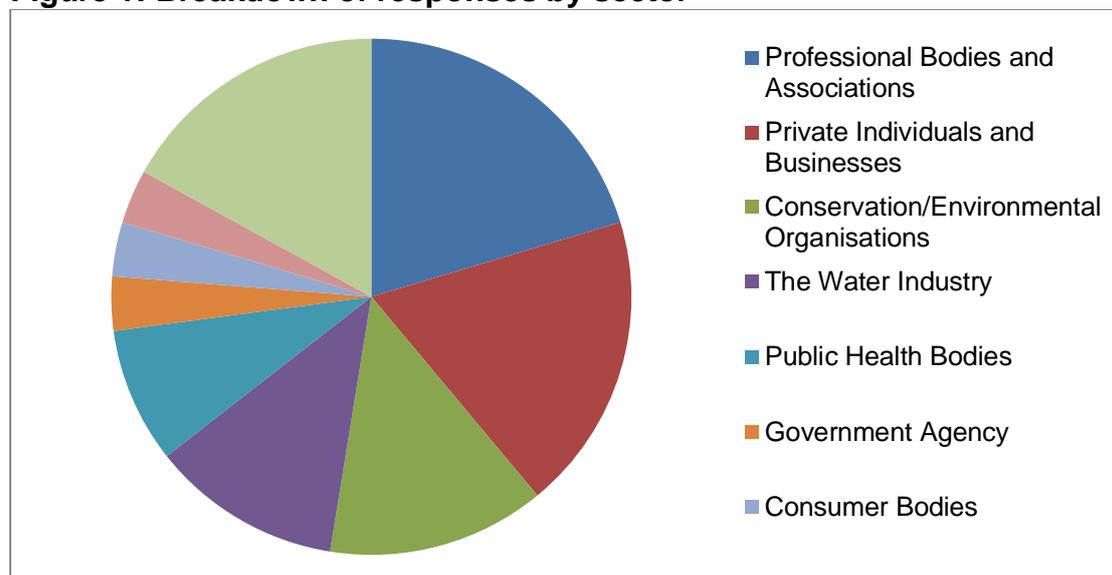
2.1 Overview

In total, 59 responses were received for this consultation. Responses were received from a broad variety of organisations including: the water industry, conservation and environmental groups, private individuals and businesses, local government, public health organisations, regulators, professional bodies and consumer representatives

A breakdown of responses is shown below in Table 1 and Figure 1:

Table 1: Breakdown of respondents by sector		
Sector	Number	% of total
Professional Bodies and Associations	12	20%
Private Individuals and Businesses	11	19%
Conservation/Environmental Organisations	8	14%
The Water Industry	7	12%
Public Health and Safety Bodies	5	9%
Government Agency	2	3%
Consumer Bodies	2	3%
Local Authorities	2	3%
Other	10	17%

Figure 1: Breakdown of responses by sector



80% of the respondents provided answers to some or all of the specific questions found within the consultation document; however, several respondents replied to the consultation as a whole, and some added to their responses to the specific questions with further comments on water policy in Wales.

Given the breadth of the Water Strategy for Wales it is challenging to characterise many of the responses as positive or negative overall, however, the following graph sets out the number of responses which were deemed to

be best described as overall positive or negative, it also sets out the number that are best described as neutral.

2.2 Proposals: Section 1 - Water for Nature, People and Business

This section sets out how we intend for our water resources to be sustainably managed, meeting society's needs and offering opportunities for green growth but also protecting and enhancing our natural environment.

Question 1:

In looking at implementing legislation, are there any specific areas that you would like us to focus on?

30 responses were received to this question.

Key Points and Themes

- A number of respondents commented that they felt that more attention should be paid by the Welsh Government to delivering compliance with the Water Framework Directive (WFD). Many of these emphasised that further action in this area would have far wider benefits than just the water environment.
- Several respondents agreed on the importance of catchment management in helping to deliver WFD compliance, as well as in supporting the delivery of other directives e.g. the Habitats Directive.
- Other respondents suggested the introduction of General Binding Rules, as a proportionate approach to strengthening the regulatory regime for protecting water and for combating diffuse pollution.
- One respondent requested work is carried out to simplify the current legislative framework around water.
- One respondent sought further clarity on the respective locations of powers and responsibilities that apply under current national UK water legislation, and the scope for Wales to legislate in future on its own behalf.
- One respondent stated that they would like Welsh Government to focus on the management and protection of the historic environment as a significant component of delivering an integrated approach to water management.
- One respondent recommended that the Silage, Slurry and Agricultural Oil (SSAFO) regulations are strengthened and incorporated into the Cross Compliance regime in order to minimise the risk of pollution from slurry storage systems and to help control activities away from the farm yard.
- One respondent expressed a desire for Part G building regulations (Sanitation, hot water safety and water efficiency) to be reviewed.

Question 2:

Do you have any suggestions for improving and extending community involvement in integrated catchment management?

28 responses were received to this question. A number of respondents specifically expressed support for Welsh Government proposals to improve community engagement.

Key Points and Themes

- Some respondents thought that the greatest impact would be achieved through locally focused catchment groups with membership from the local community. Others thought that River Basin Management Liaison panels should provide strategic direction another thought Welsh Government could coordinate and/or support this.

'We agree that we must have greater community involvement in order to deliver integrated natural resource management. We suggest that the WFD River Liaison Panels will provide strategic direction but we need to look for innovative solutions to local engagement'

- *Natural Resources Wales*

- Two respondents stated that any future Welsh Government approach needs to align with DEFRA's Catchment Based Approach and work closely with the local catchment partnerships that have recently been established.
- Two respondents stated that third sector organisations will have a greater role to play in any future plans for civic engagement, particular as they felt NRW's current resource levels would create a barrier to local community engagement.
- One respondent stated that engagement between customers and water companies was also crucial and another respondent stated that there needs to be further involvement from angling groups and local River Trusts in both the WFD liaison panels and any wider catchment management programmes.
- One respondent suggested a leaflet be produced, which would be designed to encourage wider public engagement.
- One respondent felt that the involvement of farmers and landowners was fundamental to the success of any catchment management programme.
- One respondent stated that Universities can contribute to the debate and help provide a focus for engagement, through research, technology and innovative approaches.

- One respondent did not want engagement to be constrained by political boundaries.
- One respondent suggested that that the 'urban' side of catchment processes should be made clearer.

Question 3:

We have highlighted the close link between land management and the water environment. Are you aware of examples of good practice which could be reproduced elsewhere?

29 responses were received to this question. Respondents replied by suggesting a number of examples illustrating land and water management and also where future work should be directed.

Key Points and Themes

- Catchment sensitive farming practices were highlighted by a number of respondents including National Parks Wales who mentioned their project in Snowdonia which looked to improve water quality in Llyn Tegid and reduce the incidence of algal blooms through the management of run-off and diffuse pollution from heavily-stocked areas.
- RSPB Cymru wrote about their EU LIFE Active Blanket Bog in Water Project at Vyrnwy in mid-Wales which were aimed at addressing key issues facing the Welsh uplands and examining the scientific evidence base necessary to inform future uplands management. Water was identified to be the most important and immediate issue, together with implications for greenhouse gas emissions and regulation, carbon storage and biodiversity.
- Wales Environment Link highlighted a number of projects being run by their members including:
 - RSPB Cymru, Lake Vyrnwy
 - Wildlife Trusts Wales' Source to Sea, (which includes Severn Farm Ponds Nature Reserve, an example of multi-functional sustainable urban drainage) and Pumlumon Living Landscapes
 - Pontbren project in association with Coed Cadw/ Woodland Trust and Coed Cymru
 - Wye & Usk Foundation ISAC project whole Irfon catchment approach
 - National Trust Upper Conwy Catchment Project.
- Wildlife Trusts Wales also highlighted a number of these projects in their contribution.
- United Utilities mentioned a number of projects including their work with the Irwell Rivers Trust at Wayoh (Greater Manchester), and a variety of stakeholders including the Environment Agency, the Canal

and Rivers Trust and Natural Resources Wales at the Llangollen canal, addressing pesticide issues at both these sites. They also talked about their United Utilities' Sustainable Catchment Management Programme (SCaMP) on company owned land since 2005, and non-owned catchments since 2010 and their "Catchment-wise" wastewater catchment pilot on the River Ellen (Cumbria) provides another example of good practice.

- Ofwat and the Central Association of Agricultural Valuers highlighted South West Waters Upstream Thinking Project, where they have collaborated with farmers around catchment management.
- Natural Resources Wales highlighted:
 - A farmer-led approach to sustainable land management in Pontbren.
 - Dwr Cymru Welsh Water drainage schemes in Llanelli, Grangetown and Maesteg.
- Several respondents mentioned examples they were aware of, for which further details could be provided upon request.

Question 4:

What opportunities do you see for developing PES schemes in relation to water management in Wales? What should be the role of Government in developing these schemes?

30 responses were received to this question. Respondents were, in the main, broadly supportive of the concept of PES schemes in relation to water management. A number of respondents were awaiting the outcome of the Welsh Government study into PES before giving their views.

Key Points and Themes

- A notable number of respondents stated they were concerned that any PES scheme shouldn't undermine the polluter pays principle as this is seen as fundamental to the success of any such schemes.
- Some respondents expressed a preference for a PES approach at a catchment rather than an individual level. Rewarding land owners for improvements to water quality, rather than in order to adopt specific mitigation methods.
- Many respondents saw the Welsh Government as having a key role in both the creation and function of a PES market.
- One respondent also expressed concern that in the case of payments to farmers, PES could effectively mean those that have made the right environmental decisions could now be financially disadvantaged. Another respondent was concerned farmers in receipt of the single

farm payment may be paid twice for taking action to improve water quality.

- One respondent replied that the use of PES schemes should be carefully considered as other forms of legislation may be more appropriate. Whilst another respondent stated that any PES schemes will need to work alongside basic regulator controls.

'PES schemes have an important role to play but need to be presented as part of a tiered response alongside basic regulatory controls (e.g. General Binding Rules) and voluntary initiatives.'

- WRc

- One respondent stated that there should be a more targeted approach to PES schemes and the development of other mechanisms, for example private sector incentives and investment. They suggested that public finance could be used to help draw in this finance, for example by running successor schemes to Glastir as a loan scheme that supports partnership building and innovation in environmental best practice, with loans recouped where the specified financial and environmental thresholds are surpassed.
- One respondent highlighted the possible use of the third sector, as a broker for PES schemes.
- Some respondents expressed concern about the use of Natural Resources Wales as a potential facilitator of PES schemes, and whether in some instances, where they may be a land manager and participant, this may lead to a conflict of interest.

Question 5:

What more could we do to make the most of our water, particularly in terms of supporting our agenda for green growth?

30 responses were received to this question. Many respondents highlighted the importance of water and waterways for the economy and in the tourism industry in particular.

Key Points and themes

- A number of respondents stated that Welsh Government should further encourage the use of water resources for sports and recreation both for health and well-being and economic reasons.
- Several respondents highlighted the importance of ensuring Wales' water bodies were adequately protected and sustainably managed in order to maximise their economic benefit.

- Two respondents mentioned the potential contribution hydroelectric schemes could have for green growth. One stated these abstractions should be treated differently, as 100% of water is returned.
- Two respondents stated that continued growth in areas of Wales, where water is already under pressure, needs to be supported by increased water storage, such as strategic rainwater harvesting. It was suggested could provide more support for the development of projects. Another respondent suggested the greater use of grey water.
- One respondent stated that more consideration should be given to cross-border and inter-company water trading given Wales' role in providing water to England and the resilience benefits arising for interconnection and water transfers.
- Another respondent talked about the benefits that could be derived from introducing competition to the water market.

“Albion believes that it is essential to consider, or at least reference, the potential benefits that competition can deliver, whether through existing ‘inset’ processes (e.g. Albion Water or Scottish and Southern) or following the retail market opening in 2017.”

- Albion Water

- One respondent highlighted potential issues some industries might face if brought into the abstraction licencing system.
- A respondent suggested that a clearer understanding of the economic value derived from water would help drive up water efficiency and productivity.
- One respondent believed that the PES in Wales provided an opportunity for a new innovative sector to be created in Wales.

Section Analysis

Most respondents agreed with our focus in this section. It was felt that community engagement is key in delivering our new approach, as is the involvement of third sector organisations. Overall it was felt that more emphasis needs to be put on delivering against the Water Framework Directive which will deliver wider, multiple benefits.

2.3 Proposals: Section 2 – Taking Action to Reduce Pollution

This section set out our proposals to tackle pollution through the adoption of good practices and procedures by land and business managers and by each of us as individuals

Question 6:

Do you agree with our focus on diffuse pollution? If not, please explain why.

We received 31 responses to this question, with 22 responses broadly agreeing with proposals.

7 responses were neutral in their overall comment and two organisations were broadly against the proposals, believing they didn't sufficiently address the issue. A breakdown of responses by sector is below:

Table 2: Breakdown of respondents to Question 6				
Sector	Number	Broadly agree with the Welsh Government's approach to diffuse pollution	Neutral or Uncertain	Broadly disagree with the Welsh Government's approach to diffuse pollution
Private Individuals and Businesses	1	1		
Professional Bodies and Associations	9	6	3	
Conservation/Environmental Organisations	4	2		2
The Water Industry	5	5		
Public Health and Safety Bodies	5	4	1	
Government Agency	1	1		
Consumer Bodies	1	1		
Local Authorities	1	1		
Other	4	2	2	
Totals	31	23	6	2

Key Points and Themes

- Responses to this question were overwhelmingly positive that in taking action to reduce pollution we should focus on tackling diffuse pollution. Respondents also took the opportunity when responding to this question to identify other sources contributing to environmental pollution.

'Given the greater control of point source discharges, diffuse pollution is now a major emerging issue resulting in numerous Water Framework Directive

water body failures and impacts on protected sites in both terrestrial and marine environments.'

- *Natural
Resources
Wales*

- A number of responses expressed the view that more attention needs to be given to soil erosion and run off which was identified as contributing to Water Framework Directive (WFD) failures and potential risk of flooding.
- Several responses called for more focus on industrial and urban pollution as well as encouraging increased use of sustainable drainage systems, especially for new developments.
- Two responses highlighted the need for a link to be made between the Marine Strategy Framework Directive targets to reduce human induced eutrophication and measures on land.
- Concerns were raised about the importance of ensuring that the costs of dealing with the results of diffuse pollution did not fall disproportionately on water customers.

'Water customers currently bear a disproportionate share of the costs of dealing with the results of diffuse pollution on the water environment'.

- *Consumer
Counsel for
Water*

- Several responses asked that we ensure that farming was not singled out when addressing diffuse pollution and that fuller consideration is given to other sectors which contribute to the problem.
- Issues of food security were raised by some respondents in relation to the significant role agriculture plays in the rural economy. With an increasing population that is mindful of food security and food miles, it is important that the sector is not disadvantaged to the point of loss of production.
- Some respondents also took the opportunity in answering this question to call for fuller public engagement and for information to be made more widely available if we are to effectively address the problems of diffuse pollution.

Question 7:

Are there any additional pollution problems which you believe we should identify? If so, what actions do you believe are required?

We received 26 responses to this question. The majority of responses to this question identified other pollution problems which they suggested should be addressed in conjunction with diffuse pollution.

Key Points and Themes

- The main areas of additional problems identified were chemicals and pesticides, soil erosion and sewage management, with a particular emphasis on non-mains systems.

'We believe that as diffuse pollution from ALL sources continues to be a significant factor for meeting the Water Framework Directive (WFD) standards, it should continue to be the priority area for action.' The promotion of good practise and encouraging prompt action to deal with point source pollution incidents should also be included as part of the strategy.'

- *Farming Union Wales*

- Responses also highlighted the importance of ensuring we encourage partnership working across all sectors that contribute to pollution problems, if we are to be effective in tackling these problems.
- One response raised the point that based on NRW's assessments for failure of the Water Framework Directive water bodies (January 2013), it would appear that possibly up to two-thirds of water bodies are failing, for reasons other than diffuse pollution. They identified enforcement measures as being critical in counteracting diffuse and other forms of pollution.
- One response raised the point that herbicide and pesticide applications, whilst not specifically referred to in the strategy, if not effectively addressed in the catchment can cause additional costs to water customers. Advanced water treatment processes need to be applied to mitigate the impacts. It was suggested that current regulations to deal with this needs to be more rigorously enforced. Payments for environmental services (PES) approach on no spray zones or product substitution could also be alternative approaches.
- Some emerging issues which were identified for future research were endocrine disrupting chemicals and pharmaceuticals in water supply.

- A number of respondents identified mines as contributing significantly to pollution problems. These included coal and non-coal mines and in particular abandoned metal mines which were raised as a major challenge in some catchments. Examples of particular areas for attention were lower Severn Vale Catchment, Taff and Tawe.
- A significant number of respondents identified sewage management and in particular the proliferation of small private sewage treatment works and poorly maintained cess pits and septic tanks as having a considerable impact on the environment.
- One respondent suggested that a legislative change which would provide sewerage undertakers with enabling powers (similar to those granted to local authorities) to address unlawful connections would help reduce the impact on the environment.
- It was also suggested that water companies fit event duration monitoring (EDM) to all intermittent discharges potentially impacting on shellfisheries and the recent investment taking place in relation to this was welcomed. This action will enable identification of poor performing assets and better inform investment appraisals.
- NRW raised concerns about the quality of installation and maintenance of private sewage treatment systems that can create contamination risks to potable water supplies and nearby watercourses. It was suggested that engagement with the industry that installs and maintains these systems to ensure they operate to the set out quality standards.
- There was a call to address problems associated with storm water overflows and network failure issues which still needs to be addressed.
- Some forestry management practices were highlighted as needing to be considered more fully in addressing pollution problems with specific reference to acidification. In seeking to address these issues NRW have adopted the use of “Practice guide on managing forestry in acidified catchments” in their own operations and through their regulatory role with forest operators.
- There was a call for the Strategy to give priority to the restoration and care of potential water storage areas, such as uplands blanket bog, including commercial forestry plantations.

- One response raised concerns that fracking poses a threat to water quality.
- Several responses also called for more emphasis on partnership working to achieve collective objectives and a recognition of value of different sectors working together to address the problems of pollution.

Question 8:

Do you agree with the scope of activity for General Binding Rules, as specified?

We received 31 responses to this question of which a majority of 20 were broadly in favour; 7 gave answers that expressed either no view or uncertainty and 4 were clearly opposed to the proposal as specified in the consultation document. Table 3 provides a breakdown of these by sector, below:

Table 3: Breakdown of respondents to Question 8				
Sector	Number	Broadly agree with specified scope	Neutral or uncertain	Broadly disagree with specified scope
Private Individuals and Businesses	1	0	0	1
Professional Bodies and Associations	8	5	1	2
Conservation/Environmental Organisations	6	4	2	0
The Water Industry	5	4	1	0
Public Health and Safety Bodies	4	2	2	0
Government Agency	2	2	0	0
Consumer Bodies	0	0	0	0
Local Authorities	1	1	0	0
Other	4	2	1	1
Totals	31	20	7	4

Key points and themes

- One respondent suggested making the Code of Good Agricultural Practice and the Cross Compliance rules the basis for General Binding Rules in the management of land holdings.
- Two respondents cautioned that General Binding Rules might focus on process rather than outcomes and were dependent on self-reporting.
- Several respondents stressed the need for appropriate monitoring and enforcement if GBRs were to prove effective.
- A respondent questioned whether the relatively small size of some regulated sectors in Wales could mean that there were fewer gains from

the use of GBRs and stated the need for clarification over whether NRW would be imposing civil sanctions, rather than criminal sanctions, as part of the enforcement process.

- Three respondents stressed the need for clear and comprehensive guidance as an important part of any approach to tackling diffuse pollution.
- Several respondents made comments on the need to learn lessons from the implementation of such rules in Scotland.
- Two respondents commented on the present lack of equity in terms of who pays for mitigating the effects of diffuse pollution:

‘...the need to encourage and enforce the responsibilities of other sectors such as agriculture to address water pollution is paramount as this can and does bear directly on water quality issues further downstream. As a consequence, water consumers pay a share of the cost of dealing with the results of diffuse pollution which is not equitable’

- Pembrokeshire County Council

- As a sector, farmers and landowners were united in their opposition to the proposal.

‘Any farmer who claims single farm payment under the CAP is subject to cross compliance requirements ... Non-compliance results in penalties being laid against the farmer and... the introduction of General Binding Rules could result in farmers facing double jeopardy’

- Farmers Union of Wales

Question 9:

Do you agree that variable monetary penalties are the appropriate mechanism for Natural Resources Wales to enforce general binding rules?

We received 28 responses to this question of which 17 broadly agreed with the use of variable monetary penalties, whilst 7 gave answers that expressed either no view or uncertainty. Out of the remaining 4 that expressed disagreement with penalties, 3 had also expressed opposition to the introduction of GBRs in their responses to question 8. Table 4 provides a breakdown of these by sector, below:

Table 4: Breakdown of respondents to Question 9				
Sector	Number	Broadly agree with variable monetary penalties as an enforcement mechanism	No comment / don't know / neutral	Broadly disagree with variable monetary penalties as an enforcement mechanism
Private Individuals and Businesses	0	0	0	0
Professional Bodies and	9	2	4	3

Associations				
Conservation/Environmental Organisations	7	6	1	0
The Water Industry	5	4	1	0
Public Health and Safety Bodies	2	2	0	0
Government Agency	1	1	0	0
Consumer Bodies	0	0	0	0
Local Authorities	1	1	0	0
Other	3	1	1	1
Totals	28	17	7	4

Key points and themes

- Seven of the respondents that agreed with variable monetary penalties stressed the need to ensure that penalties were proportionate to the damage caused by the particular offence and to the costs of repairing that damage.
- Three respondents, stated the need for greater detail on how penalties would work, one also asking how NRW's existing powers of enforcement would be applied to GBRs.
- Four respondents stated their opposition to penalties, three of these representing farmers and landowners, with two respondents making similar alternative proposals to a penalties based approach:

'...in terms of the development industry we would rather see NRW provide guidance to developers to educate them on the problems associated with diffuse pollution and to work with developers on bringing schemes forward'
- Home Builders Federation Limited

- Three of those who supported the use of penalties to enforce GBRs, caveated this support with views about how their use should be minimised:

'...an enforcement strategy should always consider whether the provision of advice, rather than formal enforcement, is appropriate as a response to an isolated or first breach of general binding rules.'

- Canal & River Trust

- Whilst not supporting penalties in support of GBRs by themselves, one respondent was open to a combination of both incentives and penalties
- Conversely, another response suggested more stringent measures rather than the penalties proposed
- Two respondents expressed views on how the funds raised via penalties should be used, specifically to deal with the offending circumstances:

'Remedies ...should include requiring necessary remedial work to be taken ... {and/or}...the National Assembly should seek the power to commission works and reclaim the cost.'

- Landscape Institute Wales

Section Analysis

There was broad support from respondents to our focus in this section. It was felt that the current legislative powers in some cases are appropriate but they need to be enforced properly.

2.4 Proposals: Section 3 – Improving the way we plan and manage our water services

This section sets out our proposals for ensuring secure and resilient water supplies, and the introduction of long term planning for wastewater and sewerage management. It also sets out options for promoting the efficient use of water by both business and residential consumers.

Question 10:

Do you agree with the principle behind aligning the Water Resource Management Plan and Drought Plan with the Asset Management Planning Cycle?

Of the 25 who responded to this question, all were in favour of this proposal and felt that there could be significant benefits from aligning the planning cycles, both in terms of better planning, as well as efficiencies for regulators and water companies.

Key Points and Themes

- In addition to a favourable response, two respondents highlighted the voluntary nature of the proposed waste water and sewerage management plans due to the absence of formal legal powers available to the Welsh Government.
- Some respondents commented that planning should be undertaken on an area-based or catchment basis.
- One respondent wanted the planning cycle to also be aligned with River Basin Management Plans
- One respondent stated there should be consistency between the approaches taken in England and Wales.
- One respondent had reservations about amalgamating plans into one.. Stating that combining plans could result in a reduction in the quality of planning.

Question 11:

Do you agree that there is a need to improve our long term planning for waste water and sewerage management?

Of the 29 who responded to this question, 27 agreed that there is a need for improved long term planning for waste water and sewerage management. The remaining 2 took a neutral stance.

Key Points and Themes

- Several themes appeared throughout the responses as to why a long term planning approach was needed. These included:

- Links between diffuse pollution and old, poorly maintained sewerage systems or inadequate infrastructure in rural areas (septic tanks / cess pits etc.)
 - Sewerage provision impeding planning and development
 - Climate change and associated flooding
 - The ability of the current infrastructure to cope over the longer term and at what stage this will need to be replaced.
- A number of respondents thought a long term planning approach would allow for more maintenance to take place, there for reducing the need for reactive work.
 - Several respondents suggested more planning for waste water and sewerage management could encourage the increased use of Sustainable Drainage Schemes.
 - In addition to agreeing with the need for long term planning, one respondent suggested that there may also be merit in moving to systems that treat grey water and sewerage separately.
 - One respondent asked for further clarity, expressing concern that planning in this area may duplicate what is already being done by sewerage undertakers.

Question 12:

How can we ensure that Water Companies plans link with wider natural resource management plans? Do you have views about how this should be implemented?

We received 24 responses to this question with a wide range of views on how to achieve a more joined up approach to long term water and natural resource management planning.

Key Points and Themes

- Four key themes came out in the responses to this question:
 - **Timing** – it is seen as increasingly important that water company planning cycles align with river basin management planning cycles so that they can feed into each other. This would also enable consistent investment priorities, planning assumptions and delivery targets to be agreed.
 - **Engagement** – water companies need to engage early in the planning process with all key stakeholders and take account of related planning policy.
 - **Collaborative working** – needs to be better recognition of roles in relation to land and water management issues, which can then lead to better collaboration on evidence, led planning and practical delivery.

- **Government's role** – Government guidance needs to direct companies to wider environmental, social and economic policy. Consider legislating to put a duty on utility companies to take account of natural resource management plans.

Question 13:

Do you agree with the proposals to encourage more efficient water use? Are there are further actions that can be taken?

Of the 28 responses we received, 24 agreed with the proposals set out in the draft Strategy.

Key Themes and Points

- As with the previous question, several key themes emerged from the comments:
 - Education/awareness raising about the true extent of water availability in Wales. Several respondents commented that there is a public perception along the lines of “it rains lots in Wales so we must have lots of water”.
 - Water efficiency needs to start with design, whether that is in relation to manufacturers of water using products and working within the supply chain to reduce water use and make these products more efficient; or in relation to working with planners and housing developers to design water efficiency and water reuse technology into new builds.
 - There needs to be recognition that this is wider than a ‘householder’ problem. Non-household water users, both private and public sector, also need to be targeted.
 - The Welsh Government should consider setting out an overarching policy to help deliver water efficiency consistently and in a streamlined manner through the work of different organisations, both independently and collaboratively.
 - There is a need to restore and/or make better use of the landscapes’ capacity to store water and produce other benefits, such as hydropower.
- One respondent wanted Welsh Government to create mechanisms that incentivised use of rain and grey water usage.
- A respondent was concerned about the impact of per capita targets for consumption if applied to individual households, in particular those who need to consume more water as the result of chronic health conditions, especially those who are not eligible for social tariffs.

Question 14:

Do you agree with our approach to metering? What other factors do we need to consider?

This question produced the most mixed response in this section. Of 28 responses, 16 were broadly positive towards the approach set out although almost all had caveats or notes of caution; 3 were against the proposed approach and the final 9 responses are best described as neutral.

Table 5: Breakdown of respondents to Question 14				
Sector	Number	Broadly agree with our approach to metering	Neutral	Broadly disagree with our approach to metering
Private Individuals and Businesses	2		2	
Professional Bodies and Associations	6	3	3	
Conservation/Environmental Organisations	4	4		
The Water Industry	5	1	2	2
Public Health and Safety Bodies	1			1
Government Agency	2	2		
Consumer Bodies	2	1	1	
Local Authorities	1	1		
Other	5	4	1	
Totals	28	16	9	3

Metering

- While many respondents agreed that metering is, in most cases, the fairest way to charge for water, very few felt that universal metering was an acceptable option.

'...water is essential to health and to wellbeing and that anything that discourages its use where necessary for health and public health will be strongly opposed.'

- Chartered
Institute of
Environmental
Health, Wales

- Several respondents commented that metering can sometimes be seen as putting additional burden on unmetered households. While it can lead to a more conscious approach to water usage and efficiencies, this needs to be balanced with cost implications for businesses and poorer households. Full consideration of the cost implications for water companies when developing any new approach was also identified as important..

- Sufferers of medical conditions which necessitated higher than average use of water would be disadvantaged by metering, particularly those who do not meet the criteria for 'Water Sure'.

'any metering programme would need to be developed alongside the social tariffs work currently being undertaken by water companies, and take account of water poverty issues at a local area level'.

- National Parks Wales

- Consideration needs to be given to the location of the meter one respondent suggested that the largest reductions in leakage and consumption will be achieved if meters are located externally at the property line and specification of customer meter location is fundamental to any metering policy designed to reduce consumption.
- Water companies need to ensure that they have adequate resources in terms of recording meter readings and dealing with maintenance and repair issues.
- One respondent believed that any metering policy will need to take account of the introduction of fire sprinklers in new domestic properties from 2016.
- Some respondents believed metering alone may not bring about reduced water usage. Encouraging use of range of tariffs and smart metering should provide more control and information to customers.
- Metering must be coupled with householder engagement. This will ensure that providing consumers with visibility of their water consumption will aid their behaviour change and bill management.
- There needs to be more information made available on the issues & impacts of metering proposals for rural and urban businesses.

Question 15:

Do you agree with this approach to managing leakage? Are there ways we can ensure leakage is sustainably reduced?

We received 23 responses to this question, the majority of which were in agreement to the proposed approach.

Key Points and Themes

Most of the respondents also provided some interesting and useful suggestions/comments on sustainable reduction of leakage.

- The strategy should recognise that the Welsh Government, NRW, DEFRA and the Environment Agency have a role in regulating leakage through the water resources management plan process alongside Ofwat.

- There needs to be a balance of benefits against costs in order that water bills remain affordable for the majority of people and businesses
- Leakage is an emotive issue for water customers. The Welsh Government needs to support the aspiration of forecasting a reduction in total leakage as it is important to strive for innovation and improvements. Future forecasts for reduction in leakage will need to be supported by a robust 'social' and 'economic' appraisal. To do this, the water industry as a whole may need to develop tools that quantify customer opinion such that it can be used as a component in the leakage target setting.
- Leakage needs to be maintained at the point where the environmental, economic and social cost of reducing leakage is less or equal to the cost of getting water from other sources.

'We would be concerned if water companies were instructed to reduce the level of leakage to below the sustainable economic level since this would be likely to result in significant increases in costs to water customers without any equivalent benefits being delivered. Any future metering strategy for Wales should consider the opportunities for customer side leakage management.'

- Consumer
Council for Water

- Considering leakage reduction as a water conservation measure, and setting appropriate water delivered targets (rather than water efficiency, leakage etc. separately) could help in encouraging more leakage reduction, or at least the most cost-effective mix of demand reduction measures.
- One respondent stated that not just public water supply pipes, leak and other abstractors can experience this problem also.

Section Analysis

We were pleased to see general agreement on the need for better aligned planning cycles and support for long term planning for waste water and sewerage management. Respondents provided a range of useful suggestions on linking water company plans with wider natural resource management planning and we will take account of these ideas when moving forward with the review of water management planning.

While most respondents recognised that metering is generally the fairest way to charge for water, we note the strong indication that other measures need to be explored and will focus on affordability of water and reduction of consumption.

2.5 Proposals: Section 4 - Water affordability and delivering excellent services to customers

This section highlights the Welsh Government's key priority of ensuring access to affordable water & sewerage services, both for people and business. In particular, we are concerned about the level of water charges and the impact of increases on those customers served by water companies who are least able to pay.

It sets out our proposals on tackling debt in the water industry and the continued push for water companies to provide excellent services to their customers.

Question 16:

How can we ensure best practice is shared across the water industry, to ensure that innovative solutions to address water poverty issues are shared with others?

We received 17 responses to this question.

Key Points and Themes

- Several of respondents felt that the water industry was already doing a lot to share best practice on this, and other issues, through collaboration within the industry and with stakeholders such as the Consumer Council for Water.
- Several of the responses referenced the Water UK Customer Policy Advisory Group and its sub group, the Debt Practitioners Working Group and it was suggested that the Welsh Government should look to engage with these groups and feed into them.
- Another respondent suggested that engaging with European initiatives such as the European Innovation Partnership on Water (EIPW) would provide good links into existing and developing practices.

Question 17:

Have we identified the key issues and actions in relation water affordability issues?

Of the 17 responses received to this question, 9 respondents felt that we had identified the key issues & actions, while the other 8 suggested other issues which may need to be taken into account. The issues identified are set out in the section below:

Key Points and Themes

- It was highlighted, the UK Government's Welfare Reform programme is likely to have a negative impact on bad debt and further work may need to be done around this.

- We were told by one respondent that customers have repeatedly said that whilst they accept the need to upgrade water and sewerage networks and meet environmental requirements, they do not want this to result in sudden spikes in bills. Water industry investment, therefore, needs to be paced so that customers can value what they are getting for their money.
- A number of respondents suggested that the current approach to social tariffs has limitations and the Welsh Government should consider what can be done centrally to directly assist low income and vulnerable customers in Wales.

'In implementing its Tackling Poverty agenda Welsh Government is well placed to help further coordinate action by different organisations across Wales and to help raise awareness of the assistance that is available to low income customers.'

- Consumer
Council for Water

- In particular it was felt that the current schemes for capping water bills for customers with medical conditions necessitating high water usage are not fit for purpose. For example, pensioners who are not receiving benefits will not be eligible although they may be on quite low incomes and facing high water bills.
- It was also highlighted by one respondent's research that customers also indicated that they would be more willing to pay towards the cost of funding a social tariff through water bills if this was part of a partnership approach where government and water companies also contribute.
- Affordability issues for those on private water supply and treatment infrastructure were raised as something that should be addressed, particularly where significant investment to improve these is required
- Water companies can be more effective by joining up their data on affordability, in order to better target assistance. Data from the Department of Work and Pensions could also be used.

'Water affordability is part of a broader issue of poverty, and to achieve better outcomes, a more joined up approach is needed.'

- Water UK

- There is a need for a more balanced approach to social tariffs and general users, as often the distinction between those two groups is insubstantial, particularly in rural areas. There is an urgent need for more research in the unexplored differences between urban and rural poverty. The general costs and standards of living between these landscapes are disparate and there is no single panacea that can address issues in both areas. More data is needed effectively to tackle water issues in rural areas.

- It was highlighted by one respondent that addressing water use alone will not provide any real savings unless coupled with reductions in embedded energy from heating hot water, and this needs to be better explained to customers when highlighting the advantages of efficiency measures
- It was mentioned by one respondent that consumers are sometimes charged by health professionals such as GP's and nurses when seeking their signature to claim for Welsh Water Assist. They believed the Welsh Government needs to raise awareness of social tariffs within the health sector in order that vulnerable householders can claim benefits smoothly without incurring additional costs.
- A number of respondents believed that water company payment schemes should spread payments over 12 months rather than 10 months. To reduce the cost of water per month for those who are on a low income. It should be standard practice to spread payment schemes over 12 months to support those who chose to pay using this mechanism.

'High priority needs to be given to helping customers to avoid debt in the first place... It is important that water and sewerage companies use all of the data and intelligence at their disposal to identify customers who are experiencing financial difficulty.'

- Citizens Advice
Cymru

- Other respondents said that in addition to the consideration of social tariffs and bad debt, promoting a wider package of measures could also help customers to reduce their bills. This could include an assessment of whether to opt for a meter, hot water energy audits, water efficiency audits and retrofits and payment planning/budgeting.

Question 18: Are there any other approaches we could adopt to support the needs of both domestic and business customers?

23 respondents provided additional suggestions in response to this question.

Key Points and Themes

- Some respondents suggested that further details on how the Welsh Government intends to populate the evidential base to guide development of their position on competition and innovation would be helpful.
- It was suggested that trust in companies, satisfaction with services and value for money, as well as a narrowing gap between the latter two, should be explicitly mentioned in the strategy as outcomes that companies should strive for.

- Several respondents wanted to see the water companies focus on engaging with customers on a number of issues that affect them; particularly on bills, tariffs and water efficiency.
- Another theme within responses was for more frequent meter readings and billing cycles, could possibly help reduce water company debt, particularly in properties where there is a high turnover of tenants. Business customers can also benefit from more frequent and detailed water use information.
- It was also suggested, smart metering with feedback to customers on usage at, say, a daily level could be a valuable enabler of social tariffs.
- One respondent wanted work for water companies to engage further with local authorities, housing associations, and developers to be prioritised and went further to suggest legislation could be used to ensure this happens.
- Respondents suggested the use of incentives for some businesses and households with lower incomes may be needed to enable these groups to adopt water saving approaches.

Section Analysis

We welcome the wide range of suggestions from respondents on how to tackle water affordability and continuing to deliver excellent services to customers. We recognise the need to consider water affordability as part of the wider tackling poverty objective and will work with the water companies and regulators to identify a wider package of measures to address these issues.

4.6 Proposals: Section 5 – Protecting and Improving Drinking Water Quality

The sixth section of proposals within the water strategy consultation set out Welsh Government's planned approach to ensuring high quality drinking water; in particular maintaining the high standard of public and private drinking water to ensure compliance with the Drinking Water Directive.

Question 19: Are there any additional drinking water quality matters that we should consider? Do you agree with our proposal to investigate the transfer of water supply pipes to the water companies?

We received 20 responses to this question. 6 of these responses highlighted additional drinking water quality matters that we should consider; 13 of the responses were broadly positive about Welsh Government proposals to investigate the transfer of privately owned water supply pipes to the water companies, whilst the rest are best described as neutral towards the proposal.

Additional Considerations

- One respondent highlighted pollution problems for raw water quality as also relevant to drinking water quality, in particular, phosphorus, pesticides and faecal indicator organisms. Improved catchment management approaches were a suggested solution that would help improve the water quality.
- Another respondent highlighted the serious implications pollution could have if it were to affect groundwater springs, or other water supplies, that were significant sources for potable water supplies.
- One respondent recommended an assessment of the public health impact of contaminated private drinking water supplies in Wales.
- Another respondent also suggested a requirement for a better understanding of water quality issues at private water supplies. In particular how they are affected by adjacent land management practices and how ensuring appropriate practices around the source of supply can help.
- One respondent suggested the harmonisation of the regulatory requirements for water fittings across all consumers' premises, meaning private sources of water supply will be required to meet the more stringent requirements currently only demanded for public supplies. The respondent highlighted that this would not only reduce the risk to health, but would ensure the sale of fittings, which for the majority of premises (supplied by the public supply) would be deemed unsuitable for installation is illegitimate.
- In order to improve the quality of private water one respondent suggested that support to be provided to Local Authorities to conduct their role in this.

Response to proposals for investigation into the transfer of private water supply pipes to the water companies

- The majority of respondents were positive about the proposals to investigate the transfer of water private supply pipes to the water companies.

'The transfer of supply pipes to company ownership will enable companies to undertake efficient targeted service pipe replacement/lining schemes, covering hundreds or thousands of properties at a time.'

- United Utilities

- Although no respondent appeared completely against the possibility of this transfer, many expressed concerns over who would bear the cost and how ongoing maintenance could impact on all customers' bills. In particular, concern was raised about how those who wouldn't benefit could be negatively impacted. As such the need for this to be rigorously examined to ensure any final proposal was fair and affordable was a strong message in the responses.

'We can see the benefits of the transfer of supply pipes, although we recognise the details of any transfer would have to be got right so that existing customers do not lose out. To that end a fuller assessment needs to be given to costs, risks and benefits of the proposal.'

- Water UK

- One respondent highlighted the fact that water companies can already repair customers' supply pipes with their consent and suggested they already have strong incentives to do so including achieving leakage reduction targets and cost savings through reduced costs of water.
- We received one response that raised the issue of the use of lead solder on plumbing systems and supporting any initiative taken against this and another response that mentioned the impact of incorrect materials and their installation on drinking water quality.
- One respondent disagreed that the transfer should be limited to external pipework and suggested internal pipework should also be considered, as this is where they believed the majority of water waste occurred from leakage

Question 20: Should we develop and consult on a long term strategy to remove the health risks associated with the historic use of lead in plumbing?

17 responses were received to this question, of which 14 were broadly positive about the proposal to develop and consult on a strategy for the health risks associated with use of lead in plumbing. A breakdown of responses is below:

Key Points and Themes

- Responses to this question were overwhelmingly positive to the proposal for further work to remove the health risks associated with lead in plumbing.

‘Removal of lead from drinking water systems is the most sustainable means of addressing the risk in the long term.’

- Dee Valley Water

- 4 respondents emphasised the health impacts of even low levels of lead consumption and 2 highlighted research which may show the effects are worse than previously believed, raising the possibility that the thresholds for the permitted possible level of lead consumption will need to be reduced.

‘UK advice on lead is to keep exposure low as reasonably practicable therefore we would support any measures to reduce health risks.’

- Public Health Wales

- The cost of further action to reduce the health risks associated with lead plumbing was raised by some respondents, who were concerned that further mitigation would result in additional costs for customers, or homeowners who might struggle to pay for replacement plumbing.
- One respondent suggested that the cost of reducing the risks associated with lead plumbing for the water companies could largely be offset by a reduction in the cost of removing phosphorous from water during the water and sewerage treatment process.
- The current use of phosphate compounds to treat water for lead was raised by several respondents. With that fact that rock phosphate is a finite global resource and as such a new approach will ultimately be required being a key point.
- One respondent questioned the lack of figures to quantify the scale and impact of the issue.
- The issue of the use of lead solder was raised again in response to this question, with two respondents proposing a ban on the sale of the lead solder products in Wales.

Section Analysis

A number of interesting and welcome issues were raised in response to the questions we posed in this section. The detailed comments will be useful in providing information for the delivery of the strategy and will need to be considered as part of any ongoing work we carry out to improve drinking water quality.

4.7 Proposals: Section 6 - A New Approach for Drainage

This section of the consultation sought views on proposals relating to improved sustainability of our waste and surface water drainage infrastructure, with an emphasis on a more integrated approach to its management.

This part of the consultation focussed on built drainage infrastructure such as sewerage systems and SuDS. A number of the responses made reference to land management, diffuse pollution and flood risk management, emphasising the inter-relationship between all of these and the need for an integrated approach to water management.

Question 21: Do you agree with our priorities for drainage matters?

There was broad support for our proposals relating to drainage infrastructure. We received 27 responses to this question, the majority of which (18) specifically addressed the use of sustainable drainage systems (SuDS).

Key Points and Themes

- The comments on SuDS in general emphasised the multiple benefits that this approach to surface water drainage provides and were supportive of implementation of the SuDS provisions in the Flood and Water Management Act 2010.

'We welcome initiatives to simplify current complexities for drainage and sewerage infrastructure'

- Public Health Wales

- The need to resolve ownership and maintenance funding was highlighted in a number of responses and several expressed support for wide use of this approach to divert surface water from existing sewers (retrofitting) as well as for new developments.

'it is critical for the development industry that the issue around adoption and future maintenance' of SuDS 'be clarified, otherwise this could be a further reason for delaying developments whilst the provision of Suds schemes are being negotiated'

-Home Builders Federation

- One of these responses suggested that too much was being expected of the SuDS approach and that it was not a "silver bullet".
- A small number of responses commented on highways drainage, and welcomed the proposed review of drainage ownership and related legislation.

- Water industry responses on the issue of the use of macerators were mixed, with suggestions that any legislation should take account of trials currently underway and potential barriers to controls.
- Three responses welcomed improved guidance for the provision of first time sewerage under Section 101A of the Water Industry Act 1991.

Question 22: This section has focused on built infrastructure, which mostly serves developed areas. Is there anything more we should consider for rural areas?

The 17 responses to this question had no common theme. There was support for more control of cesspools, the use of the SuDS approach in rural areas generally and reference to first time sewerage provision (Section 101A). Links between land management, maintenance of drainage systems, flooding and water pollution were emphasised in several responses.

Other responses to this question related to orphan assets (in this case a drainage pond that has not been adopted) and to the issue of wrong connections between separate drainage systems.

‘Cess pits should be an absolute last resort and if constructed there needs to be a register and a legal requirement to empty, on a regular basis with the LA with the powers to clean and charge if the emptying is not carried out by the owner.’
-National Sewerage Association

Question 23: Are there any other significant issues which you believe we should have included?

There were 12 substantive responses to this question which had little in common.

Key Points and Themes

- Sewer management and controls were identified in relation to the control of fats, oils and grease to sewers and mis-connections.

‘We are aware of the considerable problems caused by the discharge of Fats, Oils and Grease (FOG) to sewers predominantly from hot food shops. Though FOG enters the sewers in liquid form when its temperature falls it sets hard and forms blockages. It also provides a food source for rats. Welsh Government should take steps to require food premises to install a FOG interceptor to trap and remove FOG’

- Chartered Institute of Environmental Health

- Improved monitoring of storm discharges was recommended in one response and conservation interests promoted the benefits of upland restoration for improving water quality and flood risk reduction and constructed wetlands for dealing with agricultural pollution – these responses will be considered in the context of diffuse pollution in Section 4.2.

- Two responses supported the proposed review of the mandatory adoption of sewers and Ministers' Standards, including one suggestion for simplified approvals around the sewer connection process.
- One response suggested the strategy should address the effect of drainage on the historic environment.
- Another response suggested targeting first time sewerage where bathing water quality is affected.

Section Analysis

The responses to this part of the consultation were broadly supportive of our proposed new approach to drainage and did not raise any unexpected issues. The detailed comments will be useful in providing information for the delivery of the strategy. A number of the responses highlighted the importance of improving the wider understanding of drainage systems and in particular the need to ensure that they are not used for the inappropriate disposal of waste materials such as fat and wet wipes.

4.8 Proposals: Section 7 - Supporting Delivery

The final set of proposals for water with the strategy consultation provides details on the action we plan to take in order to support the delivery of our objectives and strategic outcomes.

Question 24: Do you agree with our approach to ensuring that regulation is focused on the Welsh Government priorities? Do you have any other views or suggestions regarding the regulatory framework and whether it is fit for purpose?

26 responses to this question were received to this question. 9 of these respondents explicitly agreed with the approach to ensure regulation is focused on priorities, whilst no respondents explicitly disagreed with this approach. 23 respondents provided additional views and/or suggestions on the regulatory framework.

Key Points and Themes

- Several respondents commented of proposals to align regulatory boundaries with geographical, expressing concerns over cost to the water companies and customers.

‘Over 25% of our daily supply to customers in the north west of England is abstracted from sources that have headwaters in Wales (River Dee and Lake Vyrnwy). We are therefore keen to ensure that we are consulted on any proposed changes to regulation, and would object strongly to any changes that threaten access, or increase cost of accessing, those key sources.’

- United Utilities

- A number of environment and conservation organisations wanted Welsh Government to focus on improved ecology, water quality and the water environment and should use existing powers to enforce this as much as possible.
- The importance of ensuring compliance with EU Directives, such as the Water Framework Directive, regardless of priorities, was highlighted by one respondent.
- It was stated that any change to regulatory boundaries should be subject to an assessment of the costs and benefits to customers and the environment.
- One respondent expressed concern that aligning the regulatory and geographical boundary would result in customers in Herefordshire receiving water and sewerage services from a different undertaker and that splitting catchment responsibility may reduce company incentives to protect the water environment.

- There were a number of diverging views given on representation at the Wales Water Forum, some felt more representation was required from environmental organisations, whilst others were concerned this may drown out the views on the industry and consumer bodies.
- The need for water priorities to be linked to the Future Generations Bill and the Environment Bill was highlighted.

Question 25:

Are there other actions that we should undertake to support innovation across the water sector as a whole?

We received 12 responses to this question

Key Points and Themes

- A few additional actions were suggested including:
 - Further work should be undertaken to look at behavioural change in relation to sustainability.
 - The recommendations of the UK Water Research and Innovation Partnership should be looked at.
 - The Welsh Government should include the water agenda as a headline challenge in Action Area 6 of the Wales innovation strategy.
 - We should ensure we look beyond Wales, to the UK and the world to support innovation.

Question 26:

What more could the Welsh Government do to effectively support businesses in the water sector to grow and prosper?

We received 15 responses to this question.

Key Points and Themes

- By promoting innovation and best practice for water and effluent use it was suggested by a number of respondents that Wales could create technological advantage in this area, raising its profile and becoming a centre of excellence. The water sector should also have more of a role in the innovation initiatives set up by Welsh Government, in order for its challenges to be better defined for academia and the private sector to work on solutions.
- It was suggested that the introduction on competition to the water industry would create a stronger sector.
- One respondent highlighted their belief there was no reason Welsh Government should become more active in the private water industry and to leave this to regulators.

- One respondent thought we should extend the representation at the Water Forum to include representatives on the supply chain.
- Two respondents welcomed moves by the Welsh Government to ensure the Welsh workforce has the right skill set to meet future water management needs.
- One respondent wanted us to ensure regulation is implemented in a timely and consistent manner.

Question 27:

Are there other actions that the Welsh Government needs to undertake to support the delivery of this strategy?

We received 16 responses to this question:

Key Points and Themes

- One respondent thought the strategy needed to be linked more closely to other plans, strategies and legislation. Another wanted more integration with planning and marine policy.
- It was suggested a review of water competition should be undertaken that engages directly with the companies involved.
- A number of respondents suggested we should undertake an awareness campaign on the importance on water conservation.
- A respondent highlighted the importance of evidence when taking forward water policy and welcomed the commitment within the strategy to rely on this.
- One respondent suggested we undertake further research into Wales' water footprint.

Question 28:

What information would you find useful to assess how the Welsh Government has progressed against key outcomes and actions in the Strategy?

We received 14 responses to this question.

Key Points and Themes

- A number of respondents thought a statement, or plan on how the actions will be achieved, and by when would be helpful, as well as specific review periods to assess this.

- It was suggested links to other evaluations should be made and acknowledge, particularly in relation to wider Natural Resources Programmes, Marine and Agriculture.
- The following indicators were some suggested by respondents as useful to assess how the Welsh Government has progressed against the key outcomes in the Strategy:
 - Prices for consumers, including business consumers
 - Key service performance data including water efficiency
 - Customer satisfaction data
 - Fish stock numbers
 - A strategy risk register
 - Benefits and harm on the historical environment
 - Water Framework Directive targets and compliance figures
 - Bathing Water Quality targets and Habitat Directive targets
 - SSSI wetland condition
 - Implementation of SuDS
 - Volume of water in supply
 - Percentage of water lost to leakages in delivery
 - Percentage of households with a water meter
 - Number of abstraction licences reviews
 - Average household consumption per capita
 - Number of severe flooding events
 - Restoration of uplands organic bogs
- One respondent thought a relatively small number of quantitative and qualitative measures should be used, so that progress is easily understood and communicated. Clarity on the current baseline position was also suggested.

Section Analysis

Some helpful thoughts were received from respondents on how Welsh Government can further support the delivery of its aims for water in Wales, which will feed into the final document and subsequent work. In particular, research work to support the delivery of the Silk Commission's recommendations for water.

Question 29:

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Some of those responding to the consultation provided further comment on the Water Strategy and water policy, either in response to this question elsewhere in their response. The main points of all additional comments are provided below.

- Several respondents welcomed the strategy workshops the Welsh Government held in the development of the Water Strategy for Wales. Both as an opportunity to understand the work and influence for emerging policy proposals and as a genuine opportunity to feed into the development of the Government's agenda for water.
- Some respondents felt that as a strategy for water the scope of the document wasn't broad enough, in particular it was felt more should have been included on flood risk management.
- A few respondents also wanted the strategy to identify more specific delivery mechanisms, action and timescales.
- We received some responses that felt the strategy needed to make more links to other water related strategies, such as the Coastal Zone Management Strategy.
- Several conservation bodies wanted to see more focus within the strategy on improving wildlife and biodiversity, and specific priorities should be set that will help to achieve this ambition.
- The mineral extraction industry highlighted their concerns over delays and uncertainty around how dewatering exceptions were to be removed under the Water Act 2003.
- Some respondents believed that the strategy would benefit from a more clearly defined vision.
- A number of respondents wanted to see more reference to the use of NGOs within the strategy.

3. Full List of Respondents

1. Adrian Addis
2. Albion Water
3. Allen Lambert
4. All Wales Pollution Expert Panel
5. Aluline Group Ltd
6. AMEC Environment and Infrastructure
7. Brecon Beacons National Park Authority
8. Business Stream
9. Cardiff University
10. Cefas, Food Safety Group
11. The Central Association of Agricultural Valuers
12. Chartered Institute of Environmental Health, Wales
13. Citizens Advice Cymru
14. CLA Cymru
15. Consumer Council for Water
16. Cyswllt Amgylchedd/Wales Environment Link
17. David Nattress
18. Dee Valley Water
19. Dwr Cymru Welsh Water
20. Farmers Union of Wales
21. Federation of Small Businesses
22. Gill Neale
23. Glandwr Cymru
24. Home Builders Federation Ltd
25. Institute for Archaeologists
26. The Institute of Civil Engineers
27. Keith G Pratley MBE
28. Lafarge Tarmac Trading Ltd
29. Landscape Institute, Wales
30. Mineral Products Association
31. Natural Resources Wales
32. National Botanic Garden of Wales
33. National Parks Wales
34. National Sewerage Association
35. National Surface Water and SuDS Group
36. NFU Cymru
37. Ofwat
38. Oil Care Campaign
39. Pembrokeshire County Council
40. Peter Varley
41. Public Health Wales
42. Reservoir Action Group
43. Rhondda Cynon Taf County Borough Council
44. Royal Institute of Chartered Surveyors, Wales
45. Royal Town Planning Institute
46. RSPB Cymru
47. Severn Trent
48. UK Environmental Law Association

- 49. United Utilities Group
- 50. Water Health Partnership for Wales
- 51. The Water Regulations Advisory Scheme Limited
- 52. Water UK
- 53. Wildfowl and Wetlands Trust
- 54. Wildlife Trust
- 55. WRc plc
- 56. Anonymous Response
- 57. Anonymous Response
- 58. Anonymous Response
- 59. Anonymous Response