CAMPAIGN for NATIONAL PARKS

The Rivers Trust

HEALTH CHECK

National Parks

RIVERS AT RISK REPORT

Campaign for National Parks are the only independent charity dedicated to securing the future of National Parks in England and Wales. Our independence from government means we can speak out when no-one else can. Our mission is clear: we're here to unite, inspire and empower everyone to take action and enjoy wilder National Parks.

Bluesky @campaign4parks.bsky.social
Instagram @campaign4parks
Facebook /campaignfornationalparks
LinkedIn /campaignfornationalparks

For further information: **www.cnp.org.uk**
Registered Charity (no. 295336) and Company Limited
by Guarantee in England and Wales (no. 2045556)

Registered office: Campaign for National Parks, Canopi, 82 Tanner Street, London SE1 3GN

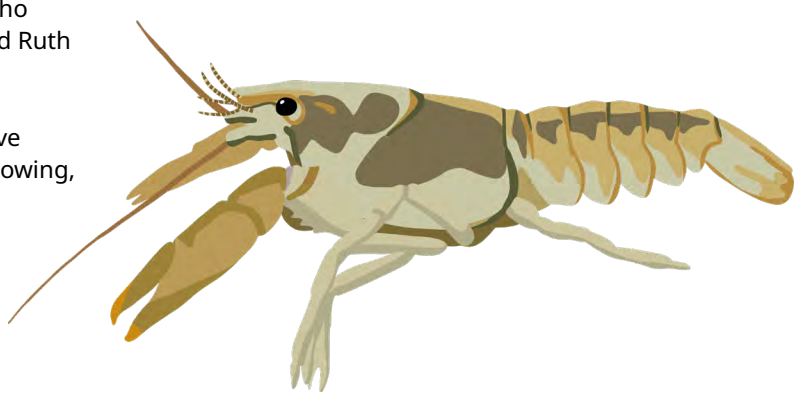
Front cover image: Llyn Y Fan Fach, Bannau Brycheiniog © Jonathan Lewis
Back cover image: New Forest © Dawn Brown

Acknowledgements

We are grateful for the support of the Rivers Trust and a large number of people who provided helpful insight and feedback throughout the development of this report. This includes Campaign for National Parks' Council members, including National Park Societies. Thanks also goes to Campaign for National Parks' staff who contributed to this report in various ways, in particular, Gareth Ludkin, who was the lead author on this report, Dr Rose O'Neill and Ruth Bradshaw.

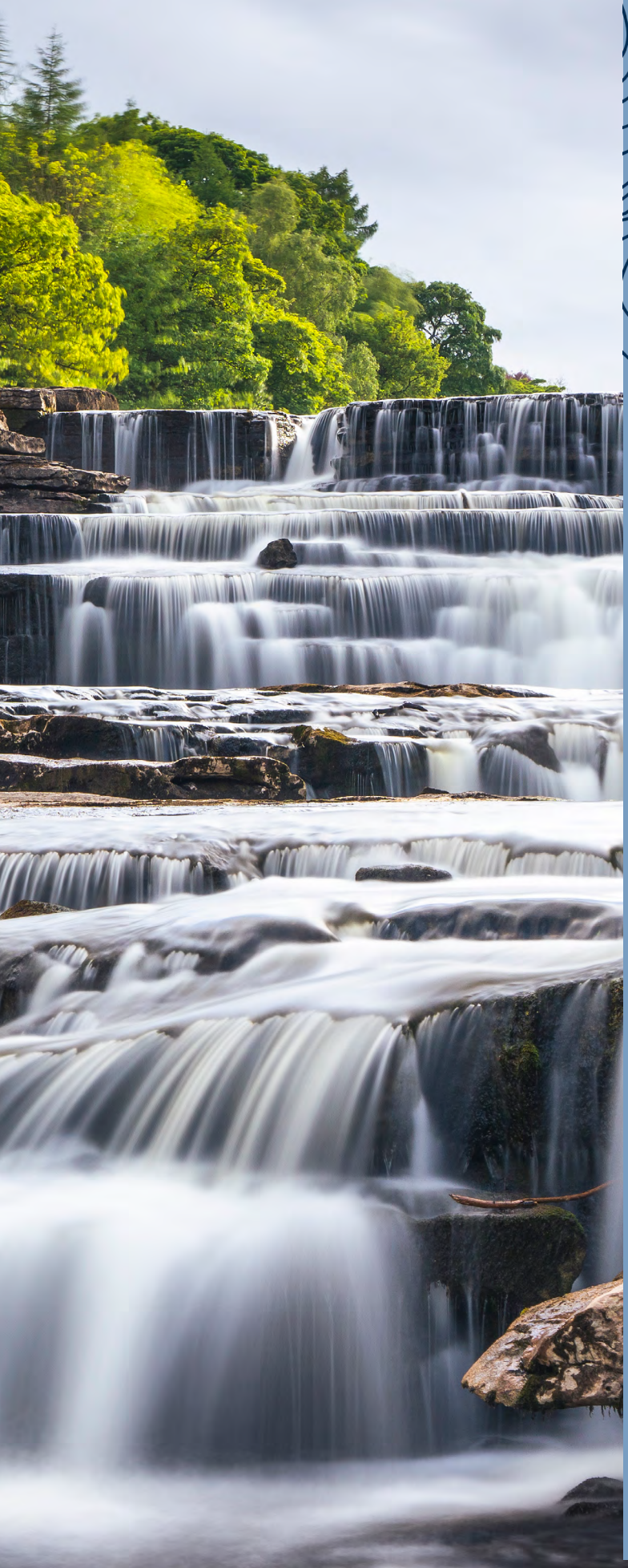
This report and our wider water project would not have been possible without the financial support of the following, and we are extremely grateful to:

- HDH Wills Charitable Trust
- The Britford Bridge Trust
- Sawday's Canopy & Stars
- Chapman Charitable Trust



CONTENTS

EXECUTIVE SUMMARY



The waterways of the UK's National Parks are iconic: internationally renowned wetlands, glacial lakes, chalk streams and some of the most biodiverse and sensitive rivers. Home to a variety of wildlife including water vole, beaver, bittern, eel and Atlantic salmon, they support natural flood management, help tackle climate change, and are much valued by millions of people as places for recreation and relaxation. These waterways are the lifeblood of our most precious landscapes.

National Parks were designated to preserve and enhance natural beauty, habitats and wildlife: we might expect their waters to be free from pollution, in far greater condition than other waterways, and protected to the highest standards. Yet this is not the case. Water in National Parks faces many challenges, just as it does across the UK.

Our Health Check Report (2024)[1] found a declining trend in National Park water quality: in England, every single lake, river and stream in a National Park was polluted, and in Wales only one water body met the highest standard. Traces of toxic chemicals, including heavy metals, pharmaceuticals, and flea and tick treatments for pets have been found even in the most pristine rivers National Parks.

...these rivers and lakes contain many of the last fragments of priority habitat and are often the last refuges for many freshwater species on the brink of extinction

Image: **Aysgarth Falls, Yorkshire Dales © Stephen Tomlinson**

National Park Authorities currently have very little power to tackle water pollution. They do play an important role as local planning authorities and are active in a wide range of catchment management and river restoration projects. But when it comes to tackling the biggest pressures, they are reliant on the water companies and water regulators to deliver (including the Environment Agency, Natural Resources Wales, Ofwat and Natural England). But for far too long water companies and regulators have neglected and turned a blind eye to National Park status.

This report sets out the latest full assessment of the state of rivers across the National Parks of England and Wales. It provides evidence of the current situation and identifies the changes needed to safeguard these rivers.

We are publishing this now because there is change on the horizon: Government in England and Wales is considering the findings of the Independent Water Commission and intend to make significant reforms to the water sector. It is critical that National Parks are considered fully within water reform.

The changing climate is already having a significant impact on water. Drier summers are already resulting in low river flows that increase the concentration of pollutants, exacerbate the impact of water abstraction and resulting in too little water to sustain wildlife. Wetter winters and more frequent and intense rainfall is already resulting in increased flooding, sewers being overwhelmed and damaging pollutants washed off fields and roads. Climate forecasts suggest that these climate effects will be far worse as we approach 2050. Unless action is taken now to improve the health and resilience of our waterways and water infrastructure, the future looks bleak for the rivers we hold so dear.

AGRICULTURAL POLLUTION OF WATERWAYS IS A KEY PRESSURE

OF RIVER WATER BODIES IN NATIONAL PARKS ARE FAILING

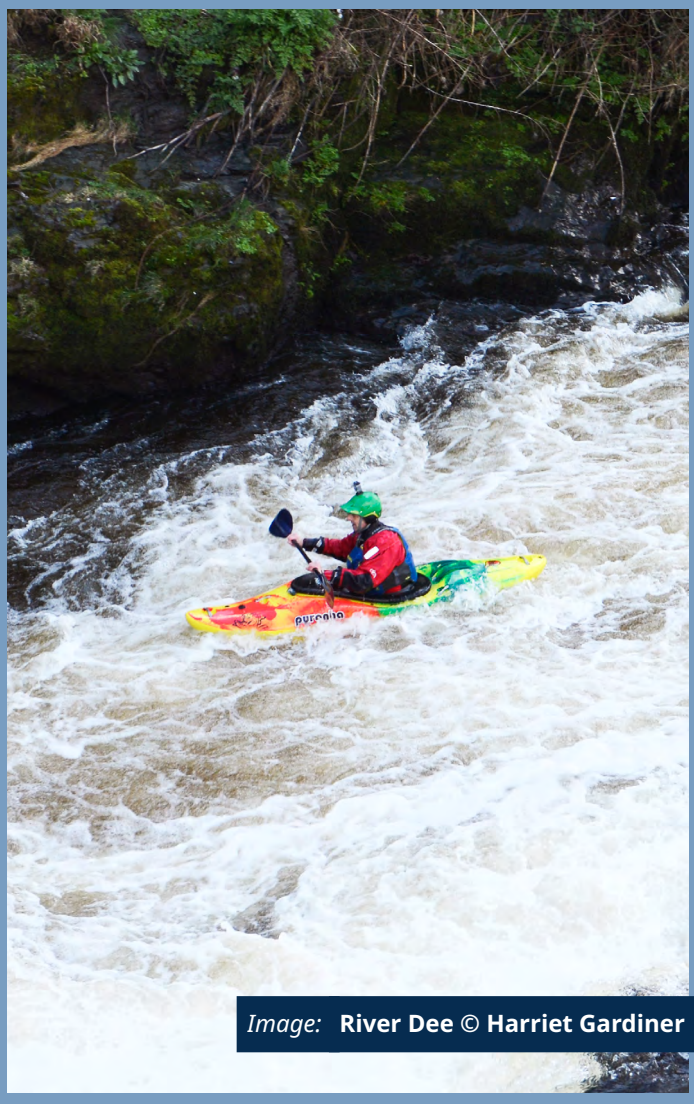
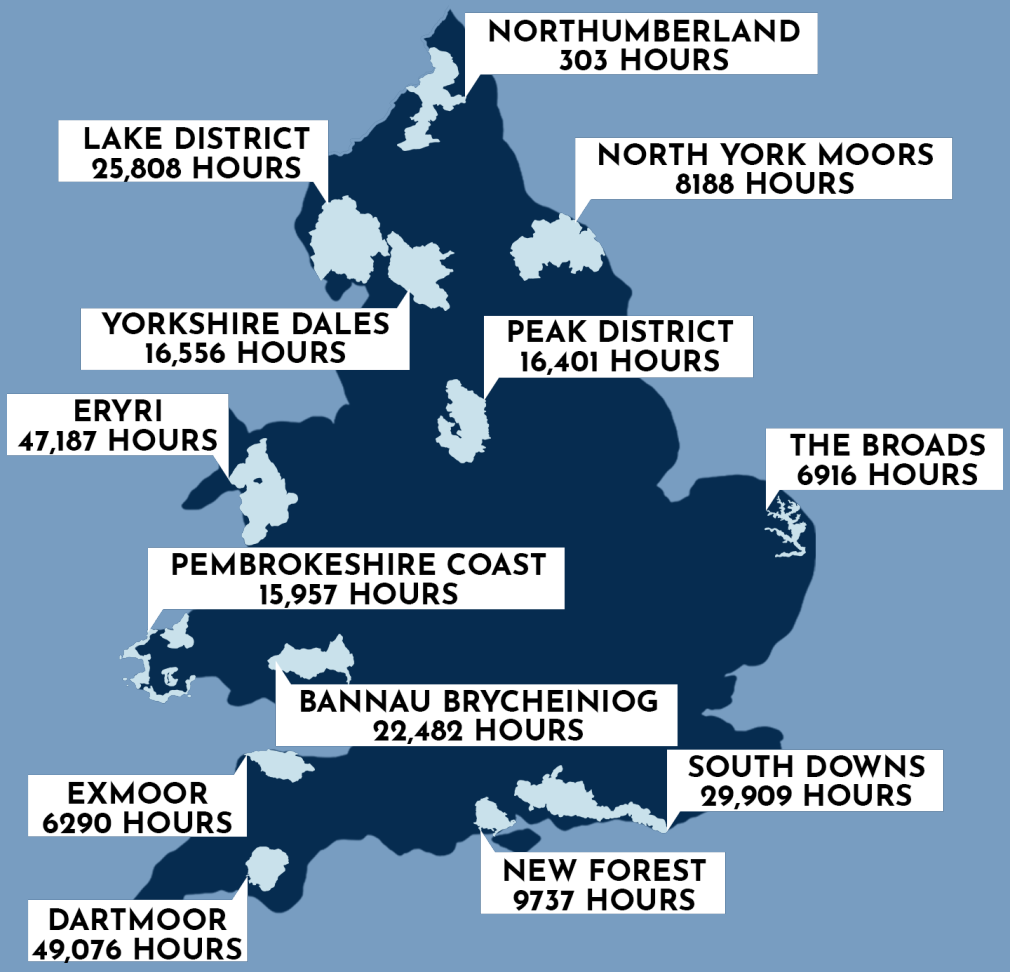


Image: **River Dee © Harriet Gardiner**

Our research findings

This report presents research led by the Rivers Trust for Campaign for National Parks. Using the latest Environment Agency and Natural Resources Wales data on Water Framework Directive monitoring, we found that:

- National Park rivers have some of the highest habitat quality and are over three times more likely to be assessed as in good ecological status than those outside. There are only four rivers in all of the country in high ecological status – three of these are in National Parks.
- Yet even in precious National Parks, freshwaters are neglected: the majority of river water bodies in National Parks (57%) do not meet the minimum ecological standards set out in law i.e. they are classed as in moderate, poor or bad ecological status.
- The main reasons why National Park rivers are failing are: pollution from agriculture and rural land management (which affects 49% of river water bodies that are not achieving good status), and the water industry (responsible for 41% of failing water bodies within National Parks).
- Northumberland National Park has the highest water quality with 59% of rivers being classed as good and a further 4% meeting high status, followed by Eryri (61% of rivers classed as good), the Lake District (58% good) and Exmoor (56% good).
- Pembrokeshire Coast National Park and The Broads are particularly impacted by agricultural pollution with the majority of river water bodies failing due to the agriculture and rural land management sector (86% and 77% respectively).
- The South Downs is the National Park most impacted by the water industry (attributed as a cause for 80% of its failing water bodies), followed by the Peak District (61%) and Dartmoor (55%).



Hours of sewage spilt in National Parks in 2024

The analysis also looked at water industry combined sewage overflows (CSOs) which discharge raw or partially treated sewage in rivers (legally permitted only in emergencies or times of extreme heavy rainfall). In 2024, CSOs discharged for a quarter of a million hours (254,808). Dartmoor and Eryri were the worst affected with 49,076 and 47,187 hours of sewage spills respectively.

To compare sewage spills on rivers inside National Parks, with those outside, we calculated the average number of hours spilling from a single permitted sewer overflow. This creates a proxy for how well sewage treatment works are designed and run – the greater the number, the more likely that a sewage treatment works is overloaded or poorly maintained. Inside National Parks the average number of hours spilling from a single permitted sewer overflow per year was 549, twice that of outside (266 hours per CSO per year). One reason for this is that small rural works that are not designed to deal with high seasonal pressures. While the population of permanent residents in the English and Welsh National Parks is less than half a million, there are more than 90 million visits each year. This means that in peak summer months, when river flows are lowest, and freshwater ecosystems at their most sensitive, tourism can massively increase the pressure on sewage systems designed for the resident population.

There is a further perverse effect, in that the legal requirements mean many wastewater treatment works in National Parks are designed to much lower standards than urban equivalents. Under UK law, works serving fewer than 2,000 residents (like most of those in National Parks) are not legally required to use secondary or advanced treatments, meaning sewage treatment is likely to be low tech.[2]

SEWAGE OVERFLOWS INSIDE THE NATIONAL PARKS ARE SPILLING ON AVERAGE FOR TWICE AS LONG AS OUTSIDE NATIONAL PARKS

254,808

HOURS OF SEWAGE WERE SPILLED IN NATIONAL PARK RIVERS

National Park rivers and waters have been ignored by successive governments, companies and regulators. With government in England and Wales working together on the biggest reform of the water sector in decades, it's time that the renowned waters of National Parks are properly recognised and prioritised. To meet international commitments to ensure 30% of land and sea is managed effectively for nature by 2030 (30x30) we must go further and faster within National Parks. It will be impossible to conserve and enhance wildlife, the natural beauty and public enjoyment of the Parks for all without urgent action on water. In England, the Levelling Up and Regeneration Act 2023 introduced an important new legal duty on public bodies, including water regulators and water companies, mandating them to "seek to further" the conservation and enhancement of National Parks. Following a request under the Environmental Information Regulations, we looked at the extent that water companies were complying with this new duty. The majority reported that they deemed business as usual sufficient (in the face of Defra guidance to the contrary). Some companies replied that to fully comply they would need regulators to support significantly more investment, whilst others suggested they were waiting for regulation to set out more detail on legal requirements. In January 2025, the Defra Water Minister promised Parliament she would "*strengthen through new regulation the role that public bodies, including water companies, must play in delivering better outcomes for nature, water, climate and access to nature in these special places [National Parks]*". Over eight months on, that promised regulation has not progressed, with growing concern about when (and if) it will be made law.

Recommendations

Our National Parks still contain some of the highest quality river systems in England and Wales, but despite their National Park status they remain rivers at risk. As the UK and Welsh Government consider substantial water reforms following the Independent Water Commission, they should prioritise action for National Park waterways.

1. Go further, faster and meet the highest standards in National Parks

Government in England and Wales must recognise the international status of National Parks, making them a top priority in water reforms. National water strategies in England and Wales must set higher levels of ambition for National Parks in recognition of their protected status. Governments should create a new National Park mandate explicitly for water regulators and water companies to ensure they also prioritise action and aim for the highest standards within National Parks.

2. National Parks must be at the heart of new laws on water and promised regulations should be published

Plans for new water legislation in England and Wales must include legally binding requirements to clean up lakes, rivers and streams in National Parks. This should include taking all actions necessary to ensure that all National Park waterways achieve at least good ecological status, with high status achieved in iconic rivers, lakes and wetlands such as the Barle, the Usk, Windermere and The Broads.

Governments in England and Wales should set statutory water targets for National Parks (e.g. water companies required to improve all storm overflows that discharge into National Parks by 2035). The most toxic chemicals, including neonicotinoids used in agriculture and spot-on veterinary flea treatments and wormers, must be banned.

The Government in England should publish the promised regulations for water in National Parks. The Welsh Government must urgently strengthen the “have regard” duty on public bodies including Dwr Cymru Welsh Water and Natural Resources Wales.

3. Sewage treatment works in National Parks must be upgraded to meet higher standards, supported by nature-based solutions

All consents and permits issued by the Environment Agency or Natural Resources Wales within the National Parks should be reviewed to ensure that they meet the highest standards, ensure no harm and are resilient to the changing climate, with effective enforcement and monitoring to ensure compliance. In National Parks, all sewage treatment works should be required to have at least secondary treatment and be sufficiently sized to cope with tourism. Those with private waste systems, such as septic tanks, should be encouraged to connect to the main sewage network.

4. Agricultural pollution tackled through a combination of Government regulation and incentives, with National Park Authorities playing a critical role

This should include targeted and ambitious actions for water within the Environmental Land Management Scheme and Farming in Protected Landscapes (England) and the Sustainable Farming Scheme (Wales). In Wales, Ffermio Bro,the Integrated Natural Resources scheme and the Nutrient Management Investment scheme are vital alongside the maintenance of Nutrient Management Boards.

5. National Park Authorities are supported and empowered to take an even greater role in catchment management

National Park Authorities need to be supported, funded and empowered to take an even greater and more ambitious role in water management, working with government, water regulators, water companies, land managers and citizen scientists to ensure these most precious waterways are well looked after and water objectives within Management Plans are delivered.

What’s next?

We are currently exploring how we might fund development of a mapping tool to support National Park Authorities and others to better access water data. We are also developing ways to celebrate and support people’s connection with National Park waterways, as part of ensuring that every citizen, no matter their age, race, class or where they live, feels welcome and connected to National Parks. Over the coming months, we will be advocating for the changes we have identified here, using these as a basis for discussion to develop these ideas further and collectively secure changes to protect our precious National Park waterways.

1. INTRODUCTION

Image: **River Bradford, Peak District © Peaklass**

The waterways of the UK's National Parks are iconic. While it is clear that water in National Parks face many challenges, just as it does across the UK, these rivers and lakes contain many of the last fragments of priority habitat and are often the last refuges for many freshwater species on the brink of extinction.

The Broads is the most biodiverse wetland in the UK, with a mosaic of habitats that contain more than a quarter of Britain's rarest animals and plants. Eryri and the Lake District have spectacular glacial rivers that would have the highest possible water quality if they were in a totally natural state. The waterfalls of Bannau Brycheiniog and the Yorkshire Dales are world renowned. From the South Downs spring a significant proportion of the world's chalk streams, and the uplands of Dartmoor and Exmoor include sensitive headwaters, breeding grounds for critically endangered species such as salmon.

Every year, millions of people explore these rivers, pools, lakes and wetlands which are much valued as places for recreation and relaxation. Healthy water bodies are also the lifeblood of the landscape, supporting a huge number of species and delivering a wide range of other benefits, including contributing to improved drinking water quality, supporting natural flood management and enhancing climate mitigation.

The condition of water bodies in National Parks has implications far beyond the boundaries of those areas. There is now a growing understanding of the links between the quality of freshwater and the health of our oceans, and the impact that land-based pollutants are having on marine life.

Pollution can affect both groundwater and surface water. The key causes include water industry sewage discharges and waste water management alongside nutrient and sediment contamination resulting from agricultural and rural land management activities (the vast majority coming from arable and livestock farming).[3] This includes the spreading of fertilisers and manures and poorly maintained slurry stores resulting in increased levels of phosphate and nitrogen which can take decades to reduce in the natural environment[4].

Over-abstraction can lead to streams running low or even drying out altogether with devastating consequences. The changing climate is also having an impact; it has been calculated that drier summers could result in some rivers having up to 80% less water in summertime by 2050, increasing the concentration of pollutants and the impact of water abstraction. Wetter winters and more frequent and intense rainfall result in increased flooding and more damaging pollutants, such as insect killing neonicotinoids, being washed off fields and roads into nearby water bodies.[5]

Our Health Check Report (2024)[6] found a declining trend in National Park water quality. In England, every single lake, river and stream in a National Park was polluted, and in Wales only one water body met the highest standard. Traces of toxic chemicals including mercury and other priority hazardous substances were found even in the most pristine rivers and lakes in England's National Parks. Recent University of York research also found widespread toxic chemical pollution within some National Parks.[7] It found higher concentrations of chemicals, including pharmaceuticals and flea and tick treatments for pets, were found in National Parks than in many UK cities. Researchers suggested that this was due to ineffective wastewater treatment, coupled with high levels of peak demand due to seasonal tourism during low (summer) water flows, and an increased proportion of elderly people (who on average take more prescription medicines) living locally. The impact of dogs on UK rivers is becoming clearer7[8] with parasiticides Imidacloprid and Fipronil, used in spot-on pet treatments, contributing to the toxic chemical concoction in our rivers.

Our National Parks still contain some of the cleanest river systems in England and Wales, but despite being in areas which should benefit from an increased level of protection there are also rivers at risk which are facing huge challenges, and in some cases critical declines in health. As the UK and Welsh Government consider a range of reforms to drive an improvement in water health following the publication of the Cunliffe report, this is a critical moment to prioritise action in our National Parks.

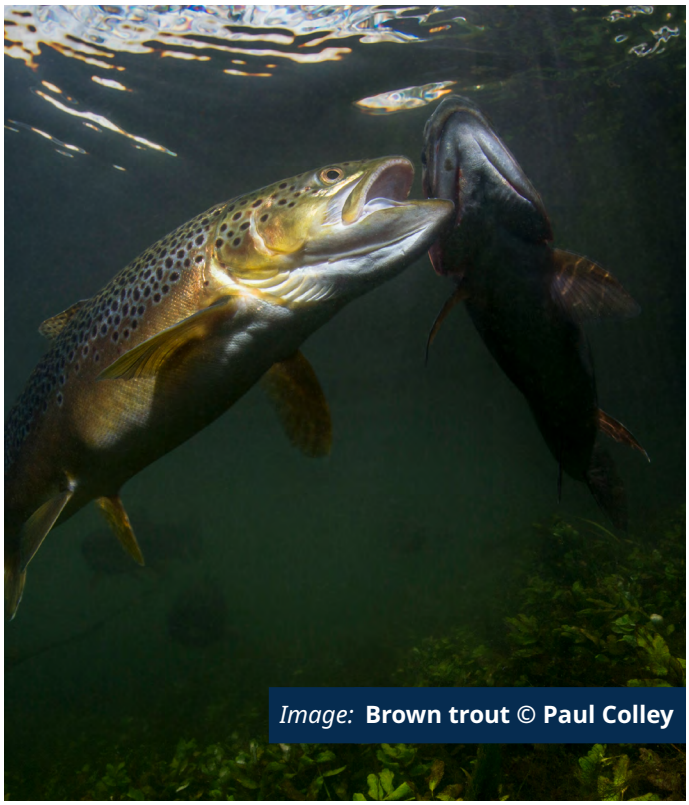


Image: **Brown trout © Paul Colley**

About this report

This report sets out the latest full assessment of the state of rivers across the National Parks of England and Wales. It provides evidence of the current situation and identifies the changes needed to policy, legislation and practice to secure the step-change in progress that is so urgently needed. In partnership with the Rivers Trust, our research included analysis of publicly available data looking at trends for each of the 13 National Parks as well as six rivers at risk: River Cleddau (Pembrokeshire Coast), the Wye (Peak District), Meon (South Downs), Lymington (New Forest), Bure (Broads) and Pulham (Exmoor).

We used freedom of information requests to secure new information on how National Park rivers fared in the water company price review process, and related decisions made by water companies and the regulators. Finally, we looked at the latest National Park Management Plans to review their water ambitions.

Rivers are complex systems, and the topic of river health is vast, but to keep this report as focused and accessible as possible, we have limited the scope of our analysis to publicly available data sets for National Parks. The report does not go into detailed analysis of aquatic ecosystem health, nor a number of other factors which can have an impact on rivers, including forestry, chemicals, invasive non-native species, abstraction and other important topics. Our methodology is explained in section 2.

We recognise the importance of National Landscapes (previously known as Areas of Outstanding Natural Beauty, AONBs) and many of the points and recommendations we raise in the report may also apply to National Landscapes, but we have not reviewed data for these areas.

The role of National Park Authorities in healthy waterways

National Park Authorities (NPAs) have very little power to tackle water pollution or improve the water environment. Instead, they are reliant on a range of organisations, including the water companies and regulators, to act to deliver healthy water environments within National Parks. The National Park Management Plan is the key mechanism to bring these organisations together to agree objectives and actions for delivery.

Water companies own 2.8% of land within all National Parks in England and Wales. However, their impact can spread far beyond their land holdings. It is therefore vitally important that NPAs work closely with water companies, land managers and other partners at a catchment scale so that investments can be targeted and aligned to deliver the greatest impact for healthy waterways.

National Park Authorities are leading some fantastic catchment projects but have very little power to tackle pollution

NPAs do have an important role to play as local planning authorities when they consider new housing developments, campsites, septic tank installations and the approval of industrial agricultural units such as those along the River Wye in Wales. They also play a significant role in catchment management and river restoration, with many examples of NPAs providing leadership, expertise and securing funding for specific river projects. For example, the REConnect community engagement project on the River Esk in the North York Moors[9], the Broads' Buttle Marsh restoration project[10], the South Downs National Park 'Downs to the Sea'[11] initiative and the co-designed Usk Catchment Partnership in Bannau Brycheiniog.[12]

Actions to improve water quality can also be supported through the Farming in Protected Landscapes (FIPL) programme in England and the recently created Ffermio Bro scheme in Wales. Both schemes allow NPAs to prioritise funding for farmers looking to improve water quality and improve rural land management practices. An example of this is the Resilient Glenderamackin landscape recovery project[13] which is coordinated by the West Cumbria Rivers Trust, supported by the Lake District National Park Authority and partly funded through FIPL. FIPL funding has also supported seven different projects to improve water management on farms in Fryup Dale in the North York Moors.

River Restoration Projects Unlocking Recovery

Centuries of human interventions have altered the flow of natural rivers across our National Parks. These have had the effect of reducing the naturalness of rivers and disrupting flood plains and migratory routes for fish. However, new river restoration initiatives that work with nature-based solutions at a landscape scale can also hold the key to climate adaptation, flood resilience, and ecosystems recovery in our National Parks.

The introduction of keystone species such as beavers can help with the re-naturalisation of river catchments, and other projects coordinated by National Park Authorities in collaboration with water companies, NGOs and other government agencies can also help to give rivers the space they need to recover and restore natural processes. These projects take time, money, efficient licensing processes and prioritisation at a national and local level to succeed.

The Ryevitalise project on the river Rye in the North York Moors has addressed in-channel obstacles for fish migration, reintroduced meanders and enhanced surrounding habitats, looking to slow the flow of water and store more of it on the land in collaboration with local landowners.

The Holincote Estate in Exmoor is managed by National Trust who have introduced beavers to the estate and established a landscape recovery project across 6,700 acres of adjoining land. Their Riverlands project piloted a pioneering scheme to revert rivers to their natural path before any human involvement, called Stage 0. Creating conditions that might have existed before human intervention has resulted in a 1780% increase in aquatic habitat, and improved habitats for sandpipers and other birdlife.

Image: **Holincote Estate, Exmoor**
© Gareth Ludkin

Image: **Eurasian otter © Jordan Yates**

The role of water regulators and water companies in healthy waterways

In England, the Levelling Up and Regeneration Act 2023 introduced an important new legal duty on public bodies including water regulators and water companies, mandating them to "seek to further the purposes of National Parks and National Landscapes" whenever they make decisions which affect land (which legally includes water) in these areas. If implemented effectively, this law would require action on water quality by those bodies, helping to address the fact that NPAs themselves have little power. In Wales, there is a duty to "have regard" to National Park purposes which means very little in practice and is easily ignored.

For far too long water companies and regulators have neglected and undermined National Park status. Given these are Protected Landscapes[14], one might assume that water regulators would set much higher standards for National Park rivers, but this is not currently the case. Objectives set by the Environment Agency (EA) and Natural Resources Wales (NRW) under the Water Framework Directive (WFD) do not take account of National Park status and many of the rivers and lakes in National Parks do not have objectives to meet good ecological status before 2027 (the legal deadline set out in the WFD in 2017), because it is deemed "disproportionately costly".

The importance of freshwater to meeting 30x30 and other environmental targets

As a signatory to the Convention on Biological Diversity Kunming-Montreal Global Biodiversity Framework[15], the UK has committed to protect 30% of land, waters and sea for nature by 2030, and both the Westminster and Welsh Governments have made domestic commitments in line with this international target, known as '30x30'.

The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017) include legally binding objectives to protect, enhance and restore river water bodies with the aim of achieving good ecological status for all by the ultimate deadline of 2027. In England, Government has interpreted this as a national target to achieve good ecological status for 75% of water bodies. In 2024, the Office of Environmental Protection found "deeply concerning failures" and concluded that the Government in England was not on track to meet this legal target[16].

A rapid review of the EIP in 2024 resulted in the setting of other timebound targets including for water companies to improve all storm overflows discharging into or near designated bathing waters, and 75% of those discharging to high-priority nature sites, by 2035. A target was also set to reduce pollution from agriculture into the water environment by at least 40% by 2038 and phosphorus loadings from treated wastewater by 80% by 2038. There is also a target to restore 75% of terrestrial and freshwater protected sites to favourable condition by 2042.

Covering 10% of land in England and 20% in Wales, including large areas of our remaining resource of semi-natural habitat, National Parks are key to achieving these targets. As Defra puts it: "*we can, and must, go further within Protected Landscapes than other areas to meet our national environmental targets, including 30by30.*"[17] In response to 30x30 commitments and changes in post-Brexit environmental governance, Welsh Government has introduced the Environment (Principles, Governance and Biodiversity Targets) Bill which aims to set legally binding targets for nature recovery, but it is not yet clear how freshwater will be factored in, or how far and fast the targets will go.

Currently, National Park designation alone is not sufficient to meet international guidelines[18] on what should be included in 30x30. In 2024, we calculated that only 6% of the total land area of National Parks is managed effectively for nature (according to 30x30 criteria when looking at the total area of Sites of Special Scientific Interest in National Parks considered to be in a favourable condition). Governments should be planning changes so that at least 75% of National Park land is effectively managed for nature18[19]; this requires significant changes to manage terrestrial and freshwater habitats as well as considerations of the marine and coastal environments which are so closely interlinked.

National Park waterways: for wildlife and recreation

National Parks have two statutory purposes: conservation and enhancement of wildlife, natural beauty and cultural heritage; and promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public. Clean water is essential to both of these purposes. National Park rivers have been attractive locations for recreation, wellbeing and enjoyment for many generations. Whether it's experiencing the healing properties of Buxton's thermal springs fed from the Peak District National Park, paddling in the shallow brooks and streams of the New Forest, canoeing along the Broads, gorge walking in Bannau Brycheiniog or diving into Lake Windermere, National Parks visitors are often attracted by the array of opportunities to get on, and in, our iconic waterways.

Despite the romantic vision of dipping your toes in a crystal-clear river, swimming in many of the nation's lakes and rivers now comes with a health warning. Reports of ill health from swimming in rivers is common[20] and it is now a challenge to find the safest places to swim depending on weather conditions or recent sewage spills. Water users are advised to check Surfers Against Sewage's Safer Seas & Rivers app for live updates.

National Park coastlines host a wonderful array of locations to take a dip in the sea, but inland there are significantly fewer legally designated bathing sites. In England and Wales there are only 31 designated inland sites and just nine inside our National Parks (eight in the Lake District and one in Bannau Brycheiniog).[21] At the latest assessment date in 2024, five of the eight sites in the Lake District are in an excellent condition, one is rated as good and two are in a poor condition. The Warren on the River Wye in Bannau Brycheiniog became the first designated bathing site on a river in Wales in 2024, but since then the site has exceeded safe bacterial levels and remains ungraded.

Participatory Decision Making

The Universal Declaration on the Rights of Rivers has been gaining prominence in recent years as local councils approve the "intrinsic rights" of the rivers Ouse and Test in the South of England.

Recognising that rivers are living entities with fundamental rights and cultural, historic and spiritual meaning has led campaigners to argue the case for rivers across the world to be entitled to legal guardianship, with rights that extend across their catchments and the resources realised to ensure protection for the rights of the river and local indigenous communities.

On the river Usk in Bannau Brycheiniog National Park the voice of nature has been represented on The Usk Catchment Partnership by We Are Nature Based CIC as nature guardian.

As the effects of climate change and flooding on local communities become more intense, decision making for river management needs to be inclusive and participatory, giving affected communities a say in river management plans. This could be achieved through National Park Authorities embedding deliberative democracy and ensuring representative decision making via a citizen's assembly or citizen's jury in each National Park to inform their management plan.

Image: **River Usk, Bannau Brycheiniog © Harriet Gardiner**

Image: **River Meon, South Downs © Rose O'Neill**

Promised regulation to drive water company action in English National Parks has stalled

Government action on water pollution

Since the 2024 election the UK Government has worked closely with Welsh Government to prioritise taking action on water pollution, together introducing the Water (Special Measures) Act, and commissioning the Independent Water Commission (the Cunliffe review) to review the water regulatory system. Further legislation is promised.

During the passing of the Water (Special Measures) Act in early 2025, Defra Water and Flooding Minister Emma Hardy told Parliament: "*The Government agree that National Parks form a vital part of our environmental heritage and must be protected. For that reason, the Government have committed to strengthening the statutory purpose of National Landscapes and National Parks to give them a clear mandate to recover nature. We will also strengthen through new regulation the role that public bodies, including water companies, must play in delivering better outcomes for nature, water, climate and access to nature in these special places.*"[22] Over eight months on, that promised regulation has not progressed, with growing concerns that Ministers are not now intending to bring forward this important regulation on water companies.

In July 2025, the Independent Water Commission published 88 recommendations for reforming the water regulatory system in England and Wales, but National Parks were not mentioned once throughout the 400+ pages of the detailed report. The Commission did call for a new National Strategy for water and a strengthened legislative framework; both are significant opportunities to properly prioritise National Parks. Ministers in England and Wales have yet to make a full response to the Cunliffe review, however, initial comments suggest that they recognise that water regulation has been too weak and ineffective, with commitments made to new national water strategies for England and Wales and new legislation to take forward reforms (including the overhaul of regulators in both countries).

Change is on the horizon: Government in England and Wales is now considering the findings of the Independent Water Commission and planning new legislation to set out significant changes for water. It is critical that National Parks are at the forefront of this water reform.

Citizen Science at the Forefront of River Health

Citizen science, led by concerned local communities and passionate campaigners, is filling the gap left behind by environmental regulators in England and Wales who are struggling to keep pace with the testing programmes necessary to respond to major incidents or highlight water pollution hotspots.

Evidence of extensive cuts to river pollution testing due to staff shortages[23] are being highlighted by campaigners who are taking testing into their own hands. Most recently, 350 citizen scientists have highlighted levels of harmful bacteria in Lake Windermere during the summer months.[24] The data showed that much of the shoreline was of a poor bathing water standard which conflicts with the official bathing water site assessments.

The Cleddau Project has been testing sites along the River Cleddau in Pembrokeshire Coast National Park for over a year, compiling their results as evidence in campaigning and lobbying work.

The Angling Trust's Water Quality Monitoring Network[25] harnesses the power of the Riverfly Partnership and anglers to collect data across many rivers in National Parks, and utilises citizen science to monitor the presence of invertebrates in rivers and streams as an indicator of water quality.[26]

Regulators have admitted that they need to be doing more to use citizen scientists to fill the gaps in record collecting but often bureaucratic processes such as health and safety, training, permissions and recording procedures are getting in the way of enabling collaboration.[27]

Image: **Freshwater species testing © CNP**

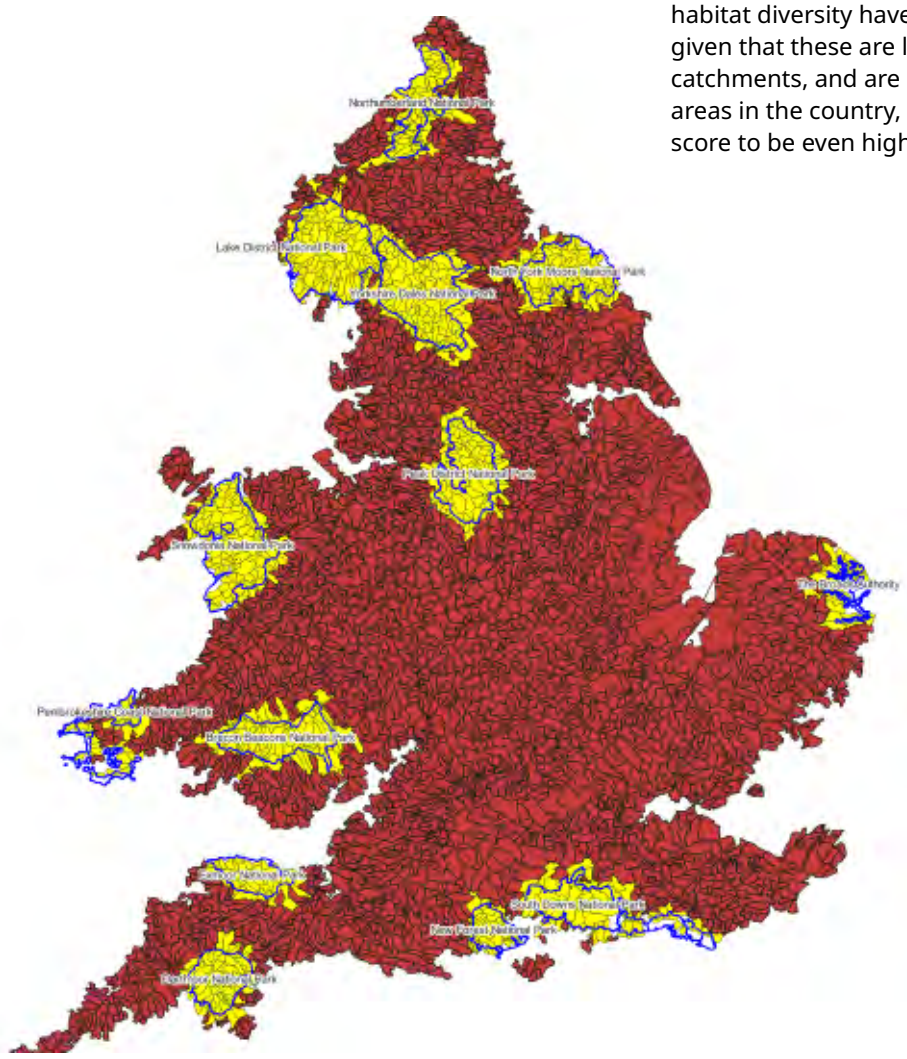
2. THE STATE OF NATIONAL PARK RIVERS

Image: **River Bovey, Dartmoor © peteholyoak**

Method

We partnered with the Rivers Trust to conduct GIS analysis of datasets published by the EA, NRW and others. The focus of the analysis was river water bodies (except for our analysis of the river Bure where we also included lakes and broads), using the latest available data. To produce a list of all the riverine National Park waterbodies, Rivers Trust exported all water bodies that intersected with 2024 National Park boundaries across England and Wales, resulting in a total of 869 water bodies [figure 1]. We note that this method may result in data that is different to that included in individual National Park management plans (which may use wider operational catchment data or a different method). The analysis included: Average Habitat Quality Assessment scores, Combined Sewage Overflow (CSO) data and Water Framework Directive ecological status, including 'Reasons for Not Achieving Good'. The list of data and sources is included in appendix 1.

Figure 1: Selected water bodies intersecting National Park boundaries



Source: Rivers Trust

Results

Habitat Quality

The Habitat Quality Assessment is an indication of overall habitat diversity provided by natural features along a river;[28] a higher score represents more diversity in habitats along the river. This could include the presence of floodplain wetlands, woody debris and backwaters for example. A lower score suggests a much lower level of habitat diversity with fewer natural features and more evidence of human intervention in the river channels and adjacent land (e.g. modifications for flood defence, land drainage or navigation).

Our analysis shows that on average National Parks compare favourably with rivers outside National Parks. Rivers within National Parks have a higher-than-average habitat assessment score, averaging 50 out of 100, compared to 41 outside National Parks [Table 1]. The National Parks with the highest habitat quality were Exmoor (scoring 61), the North York Moors (59), Dartmoor (58), and the New Forest (58), all scoring on average around 50% higher than rivers outside National Parks, which suggests that natural features and habitat diversity have been better maintained. However, given that these are largely rural and relatively natural catchments, and are supposed to be the best protected areas in the country, we should expect the average habitat score to be even higher.

Table 1: **River Habitat Survey Scores by National Park**

Area	Average Habitat Quality Assessment (0-100)
Dartmoor National Park	58
Exmoor National Park	61
Northumberland National Park	51
North York Moors National Park	59
Peak District National Park	52
The Broads Authority	23
New Forest National Park	58
South Downs National Park	41
Lake District National Park	48
Yorkshire Dales National Park	45
Brecon Beacons National Park	51
Pembrokeshire Coast National Park	49
Eryri National Park	50
National Park Average	**50**
Outside National Parks	**41**

Source: Natural Resources Wales, and Environment Agency River Habitat Assessment Surveys analysed by Rivers Trust for CNP

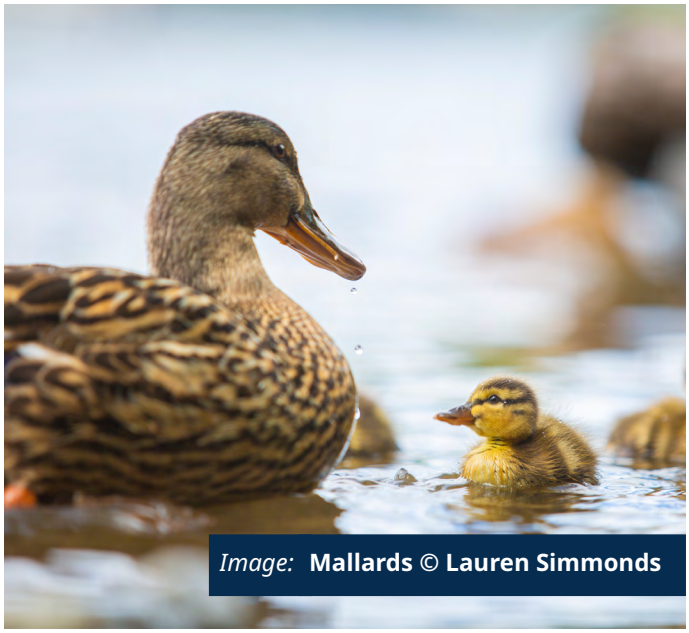


Image: **Mallards © Lauren Simmonds**

Ecological Health

Analysis of Water Framework Directive data (compiled by the EA and NRW) shows that 42% of river water bodies within National Parks are assessed as in good ecological status compared to 12% of rivers outside National Parks, meaning they are more than three times as likely to be in good ecological health.

However, the majority of rivers within National Parks (57%) do not meet the minimum ecological standards set out in law (i.e. are classed as in moderate, poor or bad ecological status). This compares with 87% of rivers outside National Parks which do not meet the minimum ecological standard. In Wales the rate improves to 48%, but Afonydd Cymru has raised concerns about the NRW assessments, and suggests that the country difference is due to the difference in monitoring and reporting, as opposed to tangible environmental improvement. Looking at English National Parks only, 60% of rivers are failing.

42% of river water bodies within National Parks are assessed as in good ecological status

Table 2 shows that the ecological status varies dramatically between National Parks: from 61% of rivers in Eryri being classed as good, 58% in the Lake District and 56% in Exmoor; down to 6% of rivers in the Broads and 10% in the South Downs. Northumberland National Park has the best water quality with 59% of rivers being classed as good and 4% with high status (classified as rivers near natural conditions – the only ones in the country).

Table 2: **Ecological Status of river water bodies (Water Framework Directive 2022)**

National Park	Number of river catchment waterbodies wholly or partially in National Park	WFD ecological status (% river water bodies)					
		High	Good	Moderate	Poor	Bad	Failing: moderate to bad
Broads	18	0.0%	5.6%	83.3%	11.1%	0.0%	94.4%
Exmoor	41	0.0%	55.6%	28.4%	14.8%	1.2%	44.4%
Dartmoor	56	0.0%	31.5%	61.3%	7.2%	0.0%	68.5%
Lake District	100	0.0%	57.8%	31.3%	8.4%	1.8%	41.6%
New Forest	28	0.0%	27.3%	63.6%	7.3%	0.0%	70.9%
Northumberland	68	4.4%	58.5%	30.4%	6.7%	0.0%	37.0%
North York Moors	78	0.0%	25.0%	54.5%	16.7%	3.9%	75.0%
Peak District	81	0.0%	25.2%	63.9%	10.3%	0.7%	74.8%
South Downs	61	0.0%	9.9%	52.1%	33.9%	4.1%	90.1%
Yorkshire Dales	122	0.0%	52.9%	38.3%	7.5%	1.3%	47.1%
English National Park Total	**653**	**0.4%**	**38.9%**	**45.7%**	**13.0%**	**1.5%**	**60.3%**
Bannau Brycheiniog	76	0.0%	46.3%	45.0%	8.8%	0.0%	53.8%
Eryri	107	0.0%	61.1%	36.1%	1.9%	0.9%	38.9%
Pembrokeshire Coast	33	0.0%	33.3%	57.6%	9.1%	0.0%	66.7%
Welsh National Park Total	**216**	**0.0%**	**51.8%**	**42.1%**	**5.5%**	**0.4%**	**48.1%**
All National Parks	**869**	**0.3%**	**42.1%**	**44.9%**	**11.2%**	**1.3%**	**57.3%**
Outside National Parks	**3615**	**0.0%**	**12.1%**	**64.0%**	**20.3%**	**3.5%**	**87.8%**

Source: Natural Resources Wales, WFD Classification Data and Environment Agency Catchment Data Explored analysed by Rivers Trust for CNP

The variation in ecological status of National Park rivers is in part due to the fact that many, like Northumberland and Eryri, contain sensitive headwaters or are low-density upland landscapes with semi-natural environments. Whereas the waterways of the Broads and the Pembrokeshire Coast are at the bottom of the catchment and are therefore more likely to contain pollutants drained from land, towns and cities upstream of the National Park boundaries.

We have taken a deeper look at why three-fifths of National Park river water bodies are failing to meet good ecological status. Because of the complex physical, biological and chemical factors which interact and affect rivers, it is unlikely to be a single reason for failure, so individual river water bodies can be given multiple reasons for failing to achieve good ecological status. This could be because the pollution from one source is worsening the effects of another, or that there is evidence of multiple sources of pollution present.

Like the rest of the country, the main sectors contributing to these failures are agriculture and the water industry

Agriculture and rural land management and the water industry are the predominant reasons for failure in National Parks

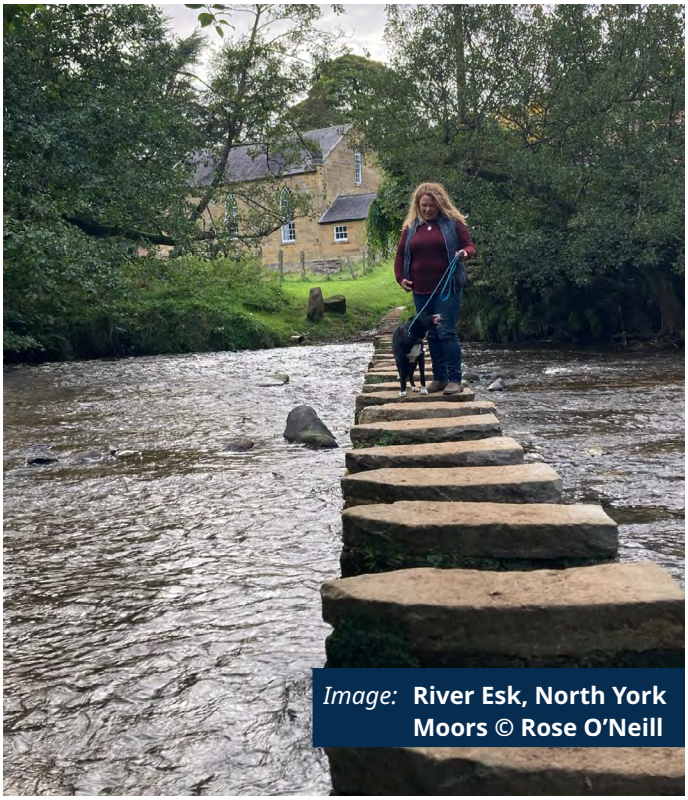


Image: **River Esk, North York Moors © Rose O'Neill**

Image: **Water vole © Dave Dunn**

[Table 3]. Agriculture and rural land management is the predominant reason for failure in National Parks, affecting 49% of river water bodies that are below good. This primarily covers arable and livestock farming activities such as slurry management, soil sediment and the spreading of manure and fertilisers on fields, but it could also include the impact of veterinary medicines, septic tanks in rural developments, forestry, equine, shooting and recreation activities (such as golf).[29]

The water industry is responsible for 41% of failing river water bodies not achieving good status within National Parks. This includes water pollution from sewage treatment works and deteriorating infrastructure. Urban and transport sources are responsible for 16% of failures, whilst local and central government (this could be policy, regulation or planning shortcomings) are responsible for 12% of failures.

Breaking these results down by National Park identifies some notable differences between them. Pembrokeshire Coast National Park is particularly afflicted by agricultural pollution with 86% of river water bodies having agriculture and rural land management as a reason for not achieving good status; the Broads is similar with 77%, reflecting the fact that these National Parks are at the bottom of intensively farmed catchments. The South Downs is one of the National Parks most impacted by the water industry (contributing to 80% of failing water bodies), followed by the Peak District (61%) and Dartmoor (55%). In cases such as the South Downs, there is evidence of both the water industry, and agriculture and rural land management, rating highly as reasons for failure (80% and 69% respectively).

Table 3: **Reasons for Not Achieving Good Status (Water Framework Directive 2022)**

	RFNAGS (% river water bodies per sector as a % of failing river water bodies)					
National Parks	**Agriculture and rural land management**	**Urban and transport**	**Water industry**	**Local and central government**	**Mining and quarrying**	**Sector under investigation**
Broads	76.5%	29.4%	52.9%	23.5%	0.0%	35.2%
Exmoor	44.4%	0.0%	38.9%	11.1%	0.0%	16.6%
Dartmoor	37.5%	10.0%	55.0%	5.0%	17.5%	15.0%
Lake District	47.6%	4.8%	28.6%	4.8%	11.9%	66.6%
New Forest	38.9%	22.2%	33.3%	16.7%	5.5%	16.6%
Northumberland	28.0%	4.0%	16.0%	8.0%	8%	100%
North York Moors	70.7%	15.5%	36.2%	25.9%	3.4%	27.5%
Peak District	42.0%	34.4%	60.7%	24.6%	9.8%	57.3%
South Downs	69.6%	26.8%	80.4%	12.5%	0.0%	32.1%
Yorkshire Dales	50.8%	5.1%	27.1%	8.5%	15.2%	35.5%
English National Parks Total	**52.0%**	**16.2%**	**45.4%**	**14.4%**	**8.1%**	**40.8%**
Bannau Brycheiniog	39.0%	17.1%	31.7%	0.0%	7.3%	39.0%
Eryri	4.9%	17.1%	7.3%	4.9%	17.7%	7.3%
Pembrokeshire Coast	86.4%	0.0%	40.9%	0.0%	0.0%	9.0%
Welsh National Parks Total	**35.5%**	**13.4%**	**24.0%**	**1.9%**	**9.6%**	**20.1%**
All National Parks	**48.6%**	**15.7%**	**41.0%**	**11.8%**	**8.4%**	**36.5%**
Outside National Parks	**86.9%**	**34.8%**	**75.5%**	**22.0%**	**6.4%**	**61.%**

Source: Natural Resources Wales, WFD Classification Data and Environment Agency Catchment Data Explored analysed by Rivers Trust for CNP

Image: **Tideswell Water Treatment Work, Peak District © Harriet Gardiner**

Sewage Discharges

So far the findings have shown that on average National Park rivers are in a better state than those elsewhere. They should be, these are within areas that should benefit from the highest levels of protection, and which have far fewer pressures than the rest of the country.

Our analysis also looked at water industry combined sewage overflows (CSO). A CSO refers to the discharge of raw, or partially treated, sewage from water industry infrastructure, something which is permitted only in emergencies i.e. at times of extreme heavy rainfall. Across the National Parks there are 464 combined sewage overflows i.e. places where water companies can legally discharge raw or partially treated sewage under certain conditions.

In 2024, 254,808 hours of sewage overflows were discharged in National Park rivers from these sites [Table 4]. Dartmoor and Eryri were the worst affected with 49,076 and 47,187 hours of sewage spills respectively. This outrageous level of sewage reflects aging and poorly maintained sewage infrastructure that is ill-designed and undersized to cope with actual resident and visitor populations.

To compare sewage spills on rivers inside National Parks, with those outside, we calculated the average number of hours spilling from a single permitted sewer overflow. This creates a proxy for how well sewage treatment works are designed and run – the greater the number of spills the more likely that a sewage treatment works is overloaded or poorly maintained. Inside National Parks the average number of hours spilling from a single permitted sewer overflow per year was 549 – more than double the average from outside (266 hours). All but two National Parks (Northumberland and the North York Moors) had a sewage spill rate that was worse than the rest of the country, and five National Parks had a spill rate more than twice that of the rest of the country (Broads, New Forest, South Downs, Lake District and Eryri). Dartmoor averages the highest at 792 hours per CSO, which is three times higher than the average outside National Parks.

Table 4: **Combined Sewage Overflows (CSO) in National Parks**

National Park	CSO Number CSOs	Total hours spilling in 2024	Average hours per CSO
Broads	9	6915.5	768.39
Dartmoor	62	49075.8	791.55
Exmoor	17	6290.1	370.01
Lake District	45	25808.1	573.51
New Forest	14	9736.9	695.49
Northumberland	5	302.7	60.54
North York Moors	39	8187.7	209.94
Peak District	42	16400.6	390.49
South Downs	39	29909.4	766.91
Yorkshire Dales	34	16556.2	486.95
England Total	**306**	**169183**	**552.88**
Bannau Brycheiniog	46	22481.5	488.73
Eryri	74	47187.0	637.66
Pembrokeshire Coast	38	15956.5	419.91
Wales Total	**158**	**85625**	**541.93**
All National Parks	**464**	**254808**	**549.16**
Outside National Parks	**16162**	**4297200.3**	**265.88**

Source: CSO - Event Duration Monitoring 2024 analysed by Rivers Trust for CNP.

One reason for the high spill rate from CSOs in National Parks is likely to be because these are small rural works that are not designed to deal with high seasonal pressures from tourism. While the population of permanent residents in the 13 English and Welsh Parks is around 399,400[30], there are more than 90 million visitors each year[31]. This means that in peak summer months, when river flows are lowest, temperatures highest and freshwater ecosystems at their most sensitive, the influx of visitors can massively increase the pressure on sewage systems designed for a fraction of the population.

There is a further perverse effect, in that the legal requirements mean many wastewater treatment works in National Parks are designed to much *lower* standards than urban equivalents. Under UK law (the Urban Wastewater Treatment Directive Regulations (England and Wales) 1994[32]), works serving fewer than 2,000 people are not legally required to use secondary or advanced treatments that biologically breakdown or remove organic matter, or address different pollutants. In many National Parks, the sewage treatment is likely to be low tech, i.e. just settling out solids, and the sewage works are likely to be older, less well maintained and smaller. This means that even seemingly "treated" sewage from wastewater plants could be causing huge damage to freshwater species and to human health in National Parks. In Europe, the Urban Wastewater Treatment Directive has recently been revised to require secondary treatment in smaller community areas with the equivalent of 1,000 people or more to ensure that they benefit from proper wastewater collection and treatment systems. These revisions have not been adopted by the UK.

Sewage in our rivers is not only unpleasant, but also dangerous. People who swim and enjoy the water for recreational activities can become seriously unwell after encountering polluted water. Increased levels of bacteria, chemicals and organic compounds from sewage can also be fatal for nature both in and out of the water, causing events such as fish die-offs and contamination down the food chain.

Respective governments in England and Wales have set legally binding targets to reduce phosphorus levels from treated wastewater by 80% by 2038. In England this includes upgrading all remaining storm overflows as part of its Storm Overflow Discharge Reduction Plan by 2050 and improving all those near designated bathing waters and 75% of sites discharging in high-priority nature sites by 2035.

The national drive to reduce sewage overflows is unlikely to improve standards within National Parks unless there is a clear requirement to do so as companies can get more 'bang for their buck' in larger works. Later in this report, we assess the role that water companies play in prioritising water quality in National Parks, and their plans to prioritise National Park rivers in future water improvement schemes.

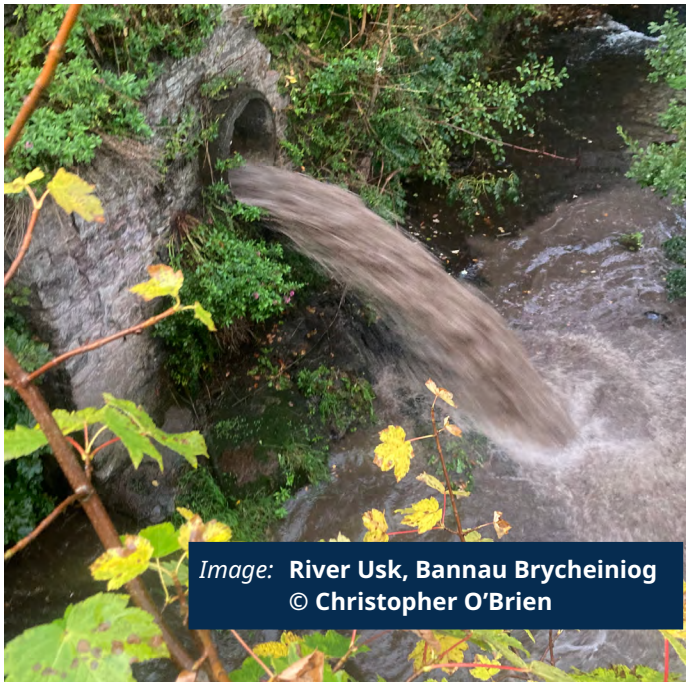


Image: **River Usk, Bannau Brycheiniog © Christopher O'Brien**

Many wastewater treatment works in National Parks are designed to much lower standards than urban equivalents

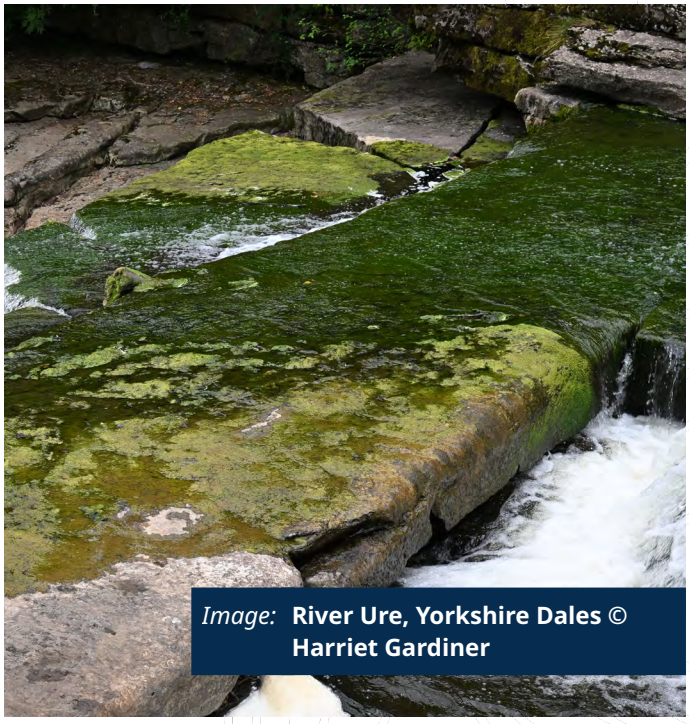


Image: **River Ure, Yorkshire Dales © Harriet Gardiner**

3. WHAT PLANS ARE THERE TO IMPROVE WATER IN NATIONAL PARKS?

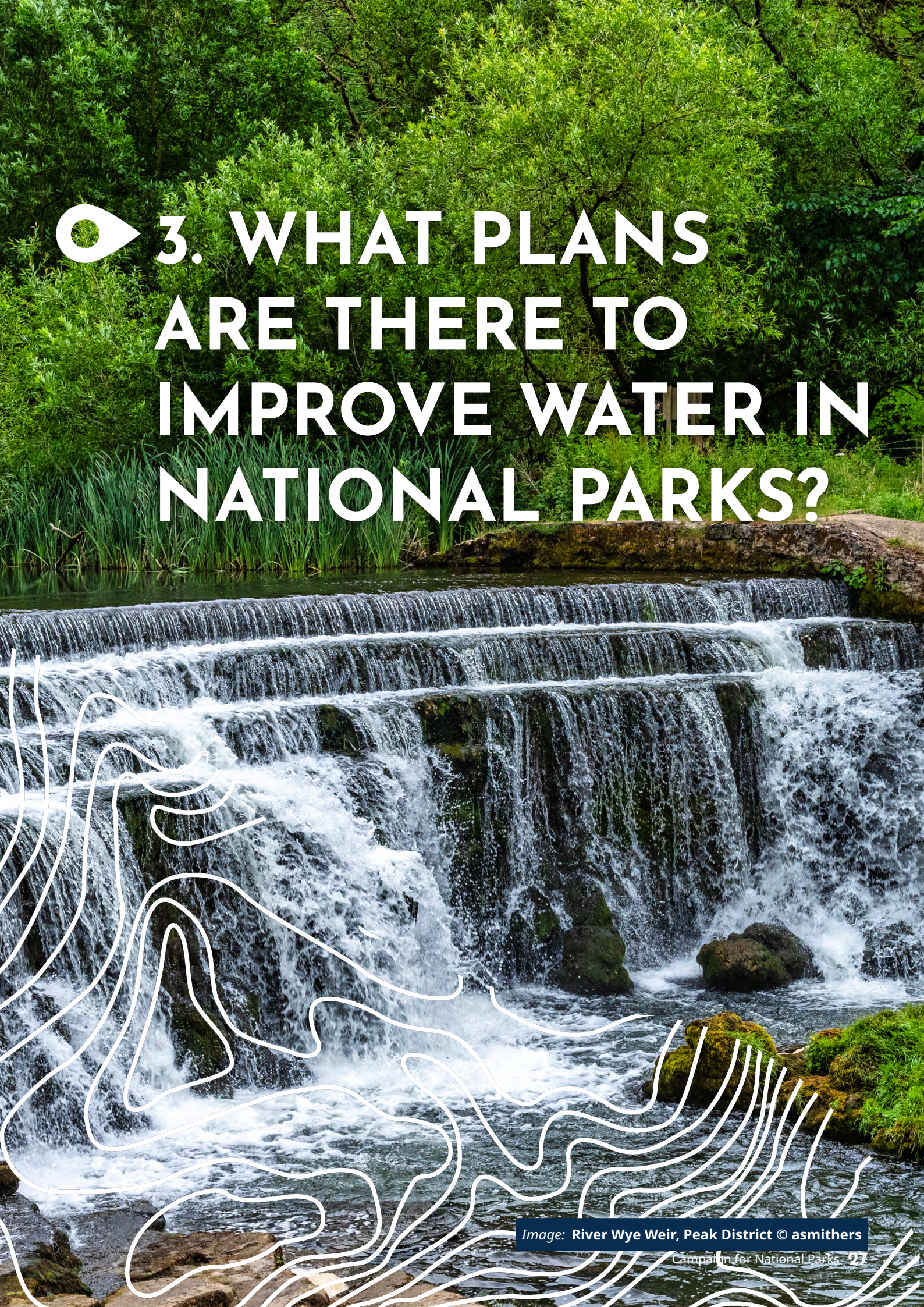


Image: **River Wye Weir, Peak District © asmithers**

What do National Park management plans say on water?

Every National Park Authority (NPA) is legally required to prepare and publish a management plan setting out the priorities for the future management of the area. The plans usually cover a 5-10 year period and it is a legal requirement that they are reviewed every five years. As well as being an important document in its own right, the management plan has a strong influence on other key documents produced by the NPA, including the Local Plan and the Corporate Plan.

NPAs are reliant on a range of other organisations, including major landowners and other key stakeholders such as the statutory bodies (Natural England and Natural Resources Wales), public bodies such as water companies and Forestry England, and local authorities in their area to implement many of the actions needed to deliver the management plans. The expectation is, therefore, that the plans are developed in partnership with these other organisations and that they are plans for the National Park rather than just the NPA. The importance of the involvement of other organisations is reflected in the fact that a number of the plans are now called partnership plans.

In England, the Levelling Up and Regeneration Act 2023 includes measures which allow for the Secretary of State to introduce regulations requiring management plans to include targets on water and set out how other public bodies will contribute to the development and delivery of those plans. However, despite Ministers making commitments to Parliament in January to make these regulations, it is currently unclear when (and if) they will be made law.

The availability of clear baseline information is important for providing a good understanding of the issues that need to be addressed by the management plan and for galvanising action. It also makes it easier to see how much difference any targets set will make and how ambitious the management plan is. For example, the Lake District Partnership Plan contains a target for 75% of rivers in the National Park to be in good ecological status by 2027 and also includes the information that 37% of rivers had achieved this status in 2019.

Our 2024 Health Check report identified that most of the plans do not contain sufficient baseline information to provide a sense of how ambitious the targets are. Often the targets were also missing. At the time we undertook that research three out of the 13 management plans contained no specific timebound targets at all across the topics we looked at (habitat restoration, species recovery, wildlife crime and water).

The level of ambition on improving water quality varies widely between the management plans. The national target in England is for 75% of water bodies to be in good ecological status[33]. However, some targets included in management plans published in the last 12 months are set lower than the national target. This highlights the scale of the task ahead if National Parks are to not only contribute meaningfully to, but to go beyond, the national target.

The South Downs draft management plan (published for consultation in June 2025) states an ambition to "achieve a 10% improvement in Water Framework Directive status for waterbodies across the National Parky by 2031." This would see an increase from 17% to 27%. The Yorkshire Dales similarly seeks to improve the percentage of rivers with good ecological status up to 65% (a 12% improvement).

Exmoor is one National Park which is seeking to align ambition with the national target in England. From a starting point of 52.8% their latest plan (adopted in July 2025) sets an ambitious target for "75% of Exmoor's monitored rivers, waterbodies and coastal or transitional bodies achieve 'high' or 'good' ecological status (in line with national goals)."

Pembrokeshire Coast's new management plan is conversely much looser and avoids a specific target: "Improve the quality of water bodies in the National Park classed as poor or moderate, within the context of the Western Wales River Basin Management Plan 2021–2027."

One reason why commitments vary so much may be the lack of direction from government. Water quality remains a glaring omission in the Protected Landscapes Targets and Outcomes Framework in England;[34] none of the ten targets that have been set for nature recovery focus on water and there is no equivalent national targets and outcomes framework for Welsh Designated Landscapes.

Water Company Obligations to 'seek to further' National Park Purposes

In England, the Levelling Up and Regeneration Act (LURA) 2023 placed stronger duties on bodies who manage land and operations in National Parks. This series of important, pro-active duties now requires all public bodies to "seek to further" the statutory purposes of National Parks (and National Landscapes) including the enhancement and conservation of wildlife and natural beauty and the promotion of opportunities for enjoyment of the special qualities of the Parks. This undoubtedly should include the right for everyone to access freshwater for leisure, and in the case of the Broads' third purpose, to protect the interests of navigation. This requires a significant change in approach compared to previous duties and must be complied with as part of any decision or course of action that has implications for National Parks. Defra has published guidance on what relevant authorities (which includes water companies) should do to demonstrate compliance with the duty.[35] Of relevance for the water industry this includes the need to consider implications for ecological connectivity or where there is a shared water catchment.

The guidance states water companies and water regulators need to apply the duty when undertaking any function in relation to, or so as to affect, a National Park, including:

- preparation of plans and associated assessments and documents
- day-to-day functions such as the management of land and water
- functions outside of a Protected Landscape which may have an effect inside the Protected Landscape
- other plans and spatial strategies which affect these areas such as River Basin Management Plans
- the issuing of licences and permits.

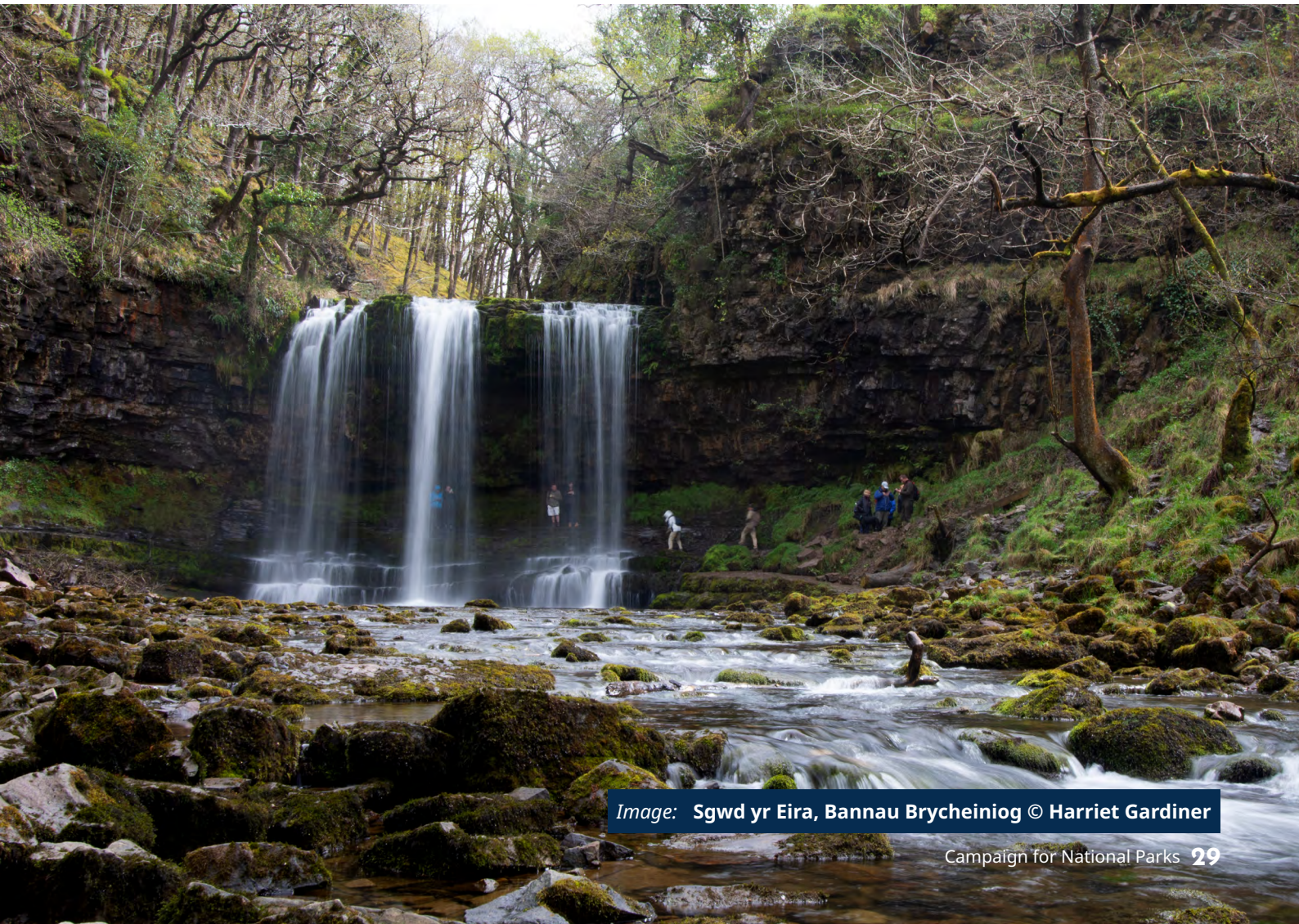


Image: **Sgwd yr Eira, Bannau Brycheiniog © Harriet Gardiner**

Image: **Eurasian Beaver ©Gregg Parsons**

In 2024 Campaign for National Parks raised a legal complaint about Ofwat with the Office of Environmental Protection. This followed an Environmental Information request which revealed that between the LURA duty coming into force in December 2023 and October 2024, Ofwat could not demonstrate any action to comply with the new law, nor could it demonstrate how it was requiring companies to "seek to further" the purposes of National Parks and National Landscapes in the price review process. This 5-yearly review, which concluded in December 2024, set price controls for water and sewage companies from 2025 to 2030 approving water company plans including delivery of their legal environmental obligations. As part of the Water Industry National Environment Programme the decisions made as part of this review affected the levels of investment by water companies in environmental improvements in National Parks. Following the complaint, Ofwat acknowledged the new duty and said that they "expect all companies to meet their legal obligations", including their duties under LURA.

Ofwat provided Campaign for National Parks with the responses to letters sent to all water companies (in England and Wales) asking specifically which schemes in their plans could impact National Parks and National Landscapes and (for those operating in England) what measures they are intending to put in place to address their legal requirements under LURA. Our analysis of the responses shows a significant variation in detail and level of understanding of the new duty and how it should be applied.

Several companies suggested that their existing approach to designing and delivering schemes in Protected Landscapes already addressed the new LURA requirements, which they considered meant that they did not need to do anything differently (we disagree as the existing approach did not fully comply with actions listed in the Defra guidance, nor address the significant failures in water company performance highlighted in part 2). One company made clear that they had not made changes to their plans following the LURA requirements, while another stated that their investment calculations did not consider enhanced requirements for National Parks. Other companies suggested they were waiting for (the promised) regulation to set out more detail on legal requirements.

Only Anglian Water and Southern Water seemed more willing to understand how the new requirements may affect what they need to do. Southern Water made clear that they had not included any additional costs in their plans for the purposes of complying with LURA. They said they would work with the water regulators and other relevant authorities to understand any new measures relating to National Parks as they arise (i.e. in 2025 onwards), noting that given Protected Landscapes make up a significant proportion of their area, any additional measures imposed on us them through LURA would be likely to have a material and additional cost impact. Anglian Water made reference to the fact that the legislation does not specify exactly how they should "further the purposes" and pointed to the additional costs for mitigations they had included in their plans for Protected Landscapes.

For most companies, the focus seemed to be on the need to take account of the implications of the new duty in relation to planning applications in Protected Landscapes. There appeared to be little thought given to how they might need to adopt a different approach to their work, or set different or more stringent objectives in these areas more generally. Nor did there seem to be much consideration for the need to allocate more funding to schemes in Protected Landscapes as a result of the LURA requirements.

The new legal requirement only came into force after the framework for the price review had been agreed, so has not had sufficient impact on the outcomes of the review and has not compelled water companies to unlock additional investment in National Parks. This means that 'business as usual' is largely maintained across schemes which have already been planned. The publication of specific guidance and secondary regulations is urgently needed to ensure rapid implementation and effective compliance with the LURA duty from water companies who either believe they are already doing enough - or do not fully understand what more they should be doing - to unlock significant investment in National Park water bodies.

Nutrient Management Boards

In 2022 the First Minister of Wales Mark Drakeford convened the first ever River Summit to tackle the issue of phosphorus pollution in Welsh Special Areas of Conservation rivers. One of the most impactful resolutions to emerge from this first summit was the establishment of Nutrient Management Boards (NMB) in recognition that no single stakeholder can solve the issue of excessive nutrient pollution alone.

The aim of the NMBs (which are set up by Local Authorities/National Park Authorities) is to create a nutrient management plan for the river which identifies actions to reduce phosphorus in the river, which members of the board can contribute toward achieving. The NMBs can also assist in data collection and review, supported by technical advisory groups to ensure that actions are evidence based.

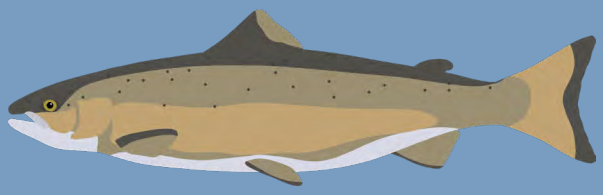
Stakeholders can include NGOs, famers, regulators, water companies and local industries, with funding provided by the Welsh Government. Several NMBs have since been setup with the involvement of the three Welsh National Park Authorities and have been an effective way of bringing new partners together for identified local, catchment-based actions. Community engagement in these NMBs is essential if community buy-in and resilience is to be achieved.

Image: **Afon Cwm Llan, Eryri © Lauren Simmonds**

4. RECOMMENDATIONS

Image: **River Itchen, South Downs © Cheriton Conservation Volunteer Group**

Following the recommendations of the Independent Water Commission (Cunliffe Review) in July 2025, governments in England and Wales are set to make wide-ranging changes to water regulation. This creates a significant opportunity to enhance our most precious waterways. There must be explicit and concerted effort to avoid repeating the past mistakes that resulted in most National Park rivers being left behind by regulators and water companies. We have set out some key recommendations for government to take forward as part of these changes.



1. Go further, faster and meet the highest standards in National Parks

Governments in England and Wales must recognise the international status of National Parks by making them a top priority in water reforms. National water strategies in England and Wales must set higher levels of ambition for National Parks in recognition of their protected status. Governments should create a new National Park mandate explicitly for water regulators and water companies to ensure they also prioritise action and aim for the highest standards within National Parks.

The new water regulators promised following the Cunliffe review must have legal duties to prioritise National Parks and the promised regional water strategies must be developed in close collaboration with National Park Authorities.

Water reforms should include a new 'People's Charter' with increased access to National Park waterways, and beyond, at its heart.

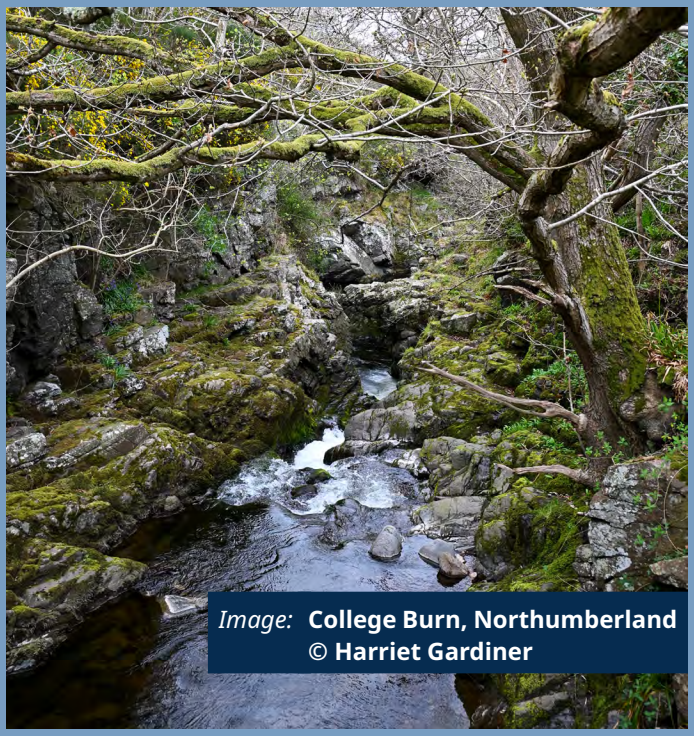


Image: **College Burn, Northumberland © Harriet Gardiner**

2. National Parks must be at the heart of new laws on water and promised regulations should be published

Plans for new water legislation in England and Wales must include legally binding requirements to clean up lakes, rivers and streams in National Parks.

We expect Government to reframe the way that the health of our waters is monitored and assessed and to set new ambitious targets at a national level. It should aim to exceed these ambitions in National Parks in terms of both condition and timeframes for achievement.

This should include taking all actions necessary to ensure that all National Park waterways achieve at least good ecological status, with high status achieved in iconic rivers, lakes and wetlands such as the Barle, the Usk, Windermere and the Broads.

Governments in England and Wales should set statutory water targets for National Parks which go further, and require swifter action, than those for the rest of the country. Without specific targets it is likely that these areas will be left further behind. For example, this should include: water companies to improve all storm overflows that discharge into National Parks by 2035 (i.e. ahead of the 2050 target for all storm overflows). Legislative reforms should also include a requirement on water companies to meet ambitious new access targets for rivers, lakes and wetlands in National Parks.

National Park Authorities should be required to set specific, time-bound targets for water in their management plans, which are informed by water targets in the Protected Landscapes Outcomes Framework in England and the Environment (Principles, Governance and Biodiversity Targets) Bill in Wales.

The most toxic chemicals, including neonicotinoids used in agriculture and veterinary flea treatments and wormers, must be banned as a matter of urgency to reduce the impact of pesticides and chemicals on National Park waterways.

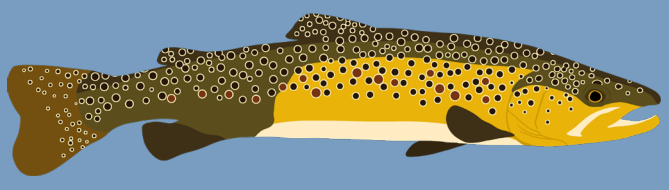
The Government in England should publish the promised regulations for water in National Parks. This will ensure rapid implementation and effective compliance with the LURA duty by water companies and regulators, requiring them to give more careful consideration to the implications of their decision-making for National Parks and ensuring they take more action to improve water quality in these areas.

The Welsh Government must urgently strengthen the "have regard" duty to ensure that public bodies in Wales, such as Dwr Cymru Welsh Water and Natural Resources Wales, are required to take similar action in support of improved water quality in National Parks. Parks.

National Park Authorities need to be supported and empowered

3. Sewage treatment works in National Parks must be upgraded to meet higher standards, supported by nature-based solutions

All consents and permits issued by the Environment Agency (EA) or Natural Resources Wales (NRW) within the National Parks (for example, for sewage overflows, wastewater treatment works or water abstraction) should be reviewed to ensure that they meet the highest standards, ensure no harm and are resilient to the changing climate, with effective enforcement and monitoring to ensure compliance. In National Parks, all sewage treatment works should be required to have at least secondary treatment and be sufficiently sized to cope with the changing climate and tourism, to ensure these places benefit from proper wastewater collection and treatment systems. Those with private waste systems, such as septic tanks, should be encouraged and enabled to be connected to the main sewage network. Adequate funding should be provided to the EA and NRW to ensure appropriate enforcement and regulation is carried out.



4. Agricultural pollution tackled through a combination of Government regulation and incentives, with National Park Authorities playing a critical role

This should include targeted and ambitious actions for water within the Environmental Land Management Scheme (England) and the Sustainable Farming Scheme (Wales). In England, this includes deepening support for catchment management through Landscape Recovery, the Water Environment Grant and Farming in Protected Landscapes. In Wales, the Ffermio Bro programme, Integrated Natural Resources scheme and the Nutrient Management Investment scheme are vital alongside the maintenance of Nutrient Management Boards.

5. National Park Authorities empowered to take an even greater role in catchment management

National Park Authorities need to be supported, funded and empowered to take an even greater and more ambitious role in water management, working with government, water regulators, water companies, land managers and citizen scientists to ensure these most precious waterways are well looked after and water objectives within Management Plans are delivered.

With the shake-up of water regulation in England and Wales, government should explore how more power could be shared and devolved to NPAs to drive delivery of management plans and hold companies and others to account. They should also introduce measures to mobilise private sector investment, underpinning voluntary codes and markets with a regulated framework that provides long-term certainty for business and ensures that investment is delivering for nature, aligning with management plans. NPAs should be supported to leverage this private finance and apply the nature finance market to projects supporting improved water quality.

Upskilling NPA staff to support catchment management is critical, learning from those that are already further ahead (like North York Moors and the Broads). From rural villages to inner cities, water connects us all. Communities and volunteers who are passionate about water or want to learn more and NPAs are already working with citizen scientists to better understand their waterways. They should be fully supported by regulators, with a framework to ensure training, integrating citizen science into monitoring frameworks and building community resilience and understanding.

5. WHAT'S NEXT?

Working together on this report, Campaign for National Parks and the Rivers Trust have identified the work we can do jointly to support improved water management in National Parks. It is clear that there is still a significant amount of work to be done to better understand the state, pressures and drivers for change within National Park waterways. We are currently exploring how we might fund development of a mapping tool to support National Park Authorities and others better access the huge amount of water data that is available. We are also developing ways to celebrate and support people's connection with National Park waterways, as part of ensuring that every citizen, no matter their age, race, class or where they live, feels welcome and connected to National Parks.

There are some incredible people who are working to protect National Park waterways. From local community groups tackling pollution and providing vital data from water samples to larger initiatives to save species and monitor entire ecosystems, there are people who love their local rivers and are working hard to protect them. But without changes to legislation and legally binding requirements local groups are often swimming against the current. Over the coming months, we will be advocating for the changes we have identified here, using these as a basis for discussion to develop these ideas further and collectively secure changes to protect our precious National Park waterways.

Campaign for National Parks is a campaigning collective with a membership including individuals, organisations and all the Friends of National Park societies. Over the coming months, we will be advocating for the changes we have identified here, and using these as a basis for discussion to develop these ideas further and collectively raise ambition.

Image: **Hareshaw Linn, Northumberland © Stewart Prince**

RIVERS AT RISK

To understand more about the steps needed to prioritise water in our National Parks we wanted to dive deeper into the state of a number of specific rivers in our National Parks which we believe demonstrate some of the core challenges faced by our National Park rivers.

RIVER CLEDDAU
Pembrokeshire Coast National Park

The river Cleddau, which starts in the National Park before exiting and returning at several points, is home to a magical array of wildlife such as otters, sea trout (sewin) and salmon.

The river however is sick, with sightings of otters becoming increasingly rare, populations of salmon considered at risk of extinction by Natural Resources Wales, and levels of phosphates in the river remaining stubbornly high.

Agriculture and rural land management is provided as a reason for not achieving good water quality status in 72% of the river's water bodies. Slurry spreading and fertilisers for crops are contributing to an overload of phosphates and nitrates in the river system.

The water industry is also provided as a reason for failure in 21% of the Cleddau's water bodies. Sewage overflows in the river are the highest of the six rivers at risk we looked at, with 34,567 hours spillage across 33 occasions in 2024. These sources of pollution are then washed out to sea, affecting the sensitive marine and coastal environment.

The Cleddau Project, a local campaigning group fighting to save the river, are holding stakeholders to account and challenging regulators and the Welsh Government to do more for the river at a catchment scale.

Image: **River Cleddau, Pembrokeshire Coast © Andy Davies**

RIVER LYMINGTON
New Forest National Park

The River Lymington is a beautiful waterbody which runs through an internationally important Special Area of Conservation within the New Forest National Park. Upstream the waters are clean and pure and a vital resource for the wildlife in the forest, including rare birds like nightjar and curlew, and animals such as pine martin as well as the wild-roaming ponies that are so important to the ecosystem.

Although 75% of the river's water bodies are currently in good ecological status, our research found that bank erosion (74% of fine sediment in the river) and sewage are significant issues threatening the health of the river.

Sections of the river have been deemed unsafe for swimming in recent years; the Lymington saw 2,847 hours of sewage overflows in 2024.

Image: **Lymington River, New Forest © Harriet Gardiner**

RIVER WYE

Peak District National Park

Rising from Axe Edge Moor in the Peak District, the Wye may be a small river in a larger network of major rivers, but it is also a vitally important waterway with cultural and ecological significance. The river powered many of the mills that made Derbyshire an industrial powerhouse and is also one of very few places in the UK where a wild population of rainbow trout is currently able to survive.

A report released in 2024 by Prof Alistair Boxall of York University showed that concentrations of pharmaceutical pollution in the Wye are at levels of concern for both human and ecological health. The report looked at pharmaceutical pollution in English National Parks[36] and showed that rivers were at high risk of contamination due to ineffective wastewater treatment, seasonal tourism, low water flows and an increased proportion of older people among the local population.

The Tideswell Sewage Treatment Works on the River Wye has been identified as a pollution hotspot due to untreated sewage being released into Tideswell Brook 125 times in 2023 alone. The brook now has the second highest level of pharmaceutical pollution in the UK, above levels experienced in cities like London and Sheffield.

Our research shows that the water industry is indicated as the main reason for failure in the river with 16 sewage overflow events in 2024 resulting in a total of 5,228 hours of spills into the river.

Image: **River Wye, Peak District © Millie Barlow**

RIVER MEON
South Downs National Park

The Chalk aquifer of the South Downs National Park stores drinking water for 1.2 million people in the south east and feeds local streams and rivers in the region. This aquifer is also the source of a significant number of the world's 200 precious chalk streams, 80% of which are in Southern England including the River Meon.

The Meon was identified by the National Rivers Authority in 1991 as suffering from acute low flows caused by abstraction. In 2025 its flows still do not support good ecological status with the water industry identified as the main reason for failure.

Neither a Special Area of Conservation nor a Site of Special Scientific Interest, this "over-abstracted" river has no protection. If licences were fully implemented up to 70% of the Meon's flow could be abstracted, causing significant environmental damage.

It's not just abstraction impacting the river, the warming effects of climate change are having a serious impact on its wildlife. Shady banks and cooler temperatures are a blessing for fish in a changing climate, however, the habitat score for the river is only 36 out of 100, meaning a less diverse and natural river habitat affected by physical modifications. Downstream, the estuary has heated up to an astonishing 25 degrees, disastrous for migratory fish that use the rivers to spawn, resulting in critically low salmon numbers.

Image: **River Meon, South Downs**
© Harriet Gardiner

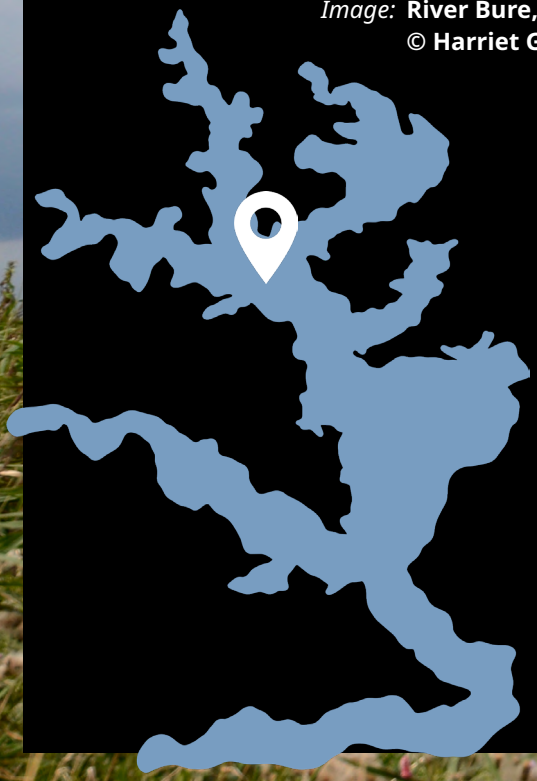
RIVER BURE
Broads National Park

The River Bure is a chalk river within the Broads National Park which has a significant role to play in supporting the most biodiverse wetland in the UK, with more than a quarter of Britain's rarest animals and plants. Cloudy water had become a major issue in the 1980s due to phosphates and unmanaged habitats turning to scrub, but the establishment of the National Park helped to turn this decline around.

Stretching 51km out to sea, the River Bure and its many interconnected broads and fens contain pike and perch, otters, bittern and marsh harriers, but despite its value for wildlife, 93% of waterbodies on the river are in a moderate to poor state.

Abstraction of water combined with the effects of rising tides and climate change are having a dramatic effect on the river, but it is agriculture and rural land management which accounts for 71% of the reasons for not achieving good status on the river. Of the rivers at risk which we looked at across our National Parks, the River Bure received the lowest total hours of sewage overflow spills (7,587 hours).

Image: **River Bure, The Broads**
© Harriet Gardiner



RIVER PULHAM
Exmoor National Park

A tributary to the river Haddeo, the River Pulham is a short but pretty 9km long river in the heart of Exmoor National Park. The river, which has one single water body stretching along its entire length, was found to have a poor status, failing due to a combination of water industry and agricultural factors. Although there is only one CSO along its length, 3,077 hours of sewage overflow was discharged into the river in 2024. The average hours of sewage per CSO in a National Park is 549 hours, making the CSO on the Pulham almost 6 times worse than the National Park average.

This is of particular concern due to the high levels of pharmaceuticals found in Exmoor National Park's waterways. In Professor Alistair Boxall's 2024 report, Exmoor was found to have concentrations of pharmaceuticals higher than seen in major cities such as London. Levels of pharmaceuticals detected at some locations on Exmoor were above levels believed to be safe for aquatic species, and antibiotics at some locations were higher than safe levels for antimicrobial resistance, indicating a potential human health risk.

Both the Exmoor Society and Broads Society have been campaigning to end the use of imidacloprid and fipronil pet flea and tick treatments because of the harm these chemicals can cause in rivers and lakes. Recently treated dogs who swim in rivers can have a severe impact on freshwater invertebrates even at very low levels of treatment.

Image: **Exmoor © Image by Shaun Davey via Exmoor Commons**

Appendices

Appendix 1: sources of data analysis

Data	Source
National Park boundaries	https://geoportal.statistics.gov.uk/maps/national-parks-december-2020-boundaries-gb-bfc
CSO - Event Duration Monitoring 2024	https://data.catchmentbasedapproach.org/datasets/95a32388235e4c888381cddaa392b572_0/explore
WFD river catchment waterbodies - England	https://www.data.gov.uk/dataset/298258ee-c4a0-4505-a3b5-0e6585ecfdb2/wfd-river-waterbody-catchments-cycle-2
WFD river catchment waterbodies - Wales	https://www.data.gov.uk/dataset/298258ee-c4a0-4505-a3b5-0e6585ecfdb2/wfd-river-waterbody-catchments-cycle-2
WFD 2022 classifications - Wales	https://datamap.gov.wales/layers/geonode:nrw_wfd_river_waterbody_catchments_c3_baseline_classification
WFD 2022 classification and RNAGS - England	https://environment.data.gov.uk/catchment-planning/
WFD 2022 RNAGS - Wales	https://cyfoethnaturiolcymru.sharefile.eu/share/view/s11466c27806c4fccb29ba4c6900cc3a1
River habitat survey - England	https://www.data.gov.uk/dataset/4cb467c9-346e-44ac-85c6-6cd579111e2c/river-habitat-survey-survey-details-and-summary-results1
River habitat survey - Wales	https://metadata.naturalresources.wales/geonetwork/srv/eng/catalog.search#/metadata/NRW_DS116339
SEPARATE source apportionment	https://www.data.gov.uk/dataset/3e698568-8492-4dfd-aa11-3439d77cd71a/source-apportionment-of-annual-nutrient-and-sediment-loads-to-rivers-in-england-and-wales-from-

Endnotes

1 Campaign for National Parks Health Check Report: https://www.cnp.org.uk/health-check-report/

2 https://www.gov.uk/government/publications/waste-water-treatment-works-treatment-monitoring-and-compliance-limits/waste-water-treatment-works-treatment-monitoring-and-compliance-limits#population-equivalent-compliance

3 Pg 3: Agriculture and Rural Land Management Challenges for the Water Environment, 2021, The Environment Agency

4 Pg4: Agriculture and Rural Land Management Challenges for the Water Environment, 2021, The Environment Agency

5 State of the water environment indicator B3: supporting evidence - GOV.UK (www.gov.uk)

6 Campaign for National Parks Health Check Report: https://www.cnp.org.uk/health-check-report/

7 Report: https://www.cnp.org.uk/news/study-reveals-pharmaceuticals-polluting-englands-national-parks/ University of York research: https://onlinelibrary.wiley.com/doi/10.1002/etc.5973

8 https://www.exmoorsociety.com/news/tick-treatments-polluting-our-rivers

9 https://www.northyorkmoors.org.uk/nature-recovery/riveresk

10 https://www.broads-authority.gov.uk/looking-after/projects/buttle-marsh-restoration-project

11 https://www.southdowns.gov.uk/downs-to-the-sea/

12 https://future.bannau.wales/usk-catchment-partnership/

13 https://www.westcumbriariverstrust.org/projects/glenderamackin

14 Protected Landscapes are defined as areas of land or sea with an explicit natural conservation plan and distinct and valuable ecological, biological, cultural or scenic character. This is a collective term for National Parks and National Landscapes. In Wales these are known as Designated Landscapes

15 https://www.cbd.int/gbf

16 OEP finds 'deeply concerning' issues with how the laws in place to protect England's rivers, lakes and coastal waters are being put into practice | Office for Environmental Protection

17 https://www.gov.uk/government/publications/criteria-for-30by30-on-land-in-england/30by30-on-land-in-england-confirmed-criteria-and-next-steps#:~:text=We%20recognise%20that%20we%20can,places%20are%20wilder%20and%20greene

18 https://iucn.org/resources/factsheet/conserving-least-30-planet-2030-what-should-count

19 National Parks are IUCN Protected Areas Category V, requiring a minimum of 75% of the land area to be managed appropriately to meet the criteria for the category. According to the IUCN, Protected Area Cat. V land that meets the criteria should also be able to meet the criteria for 30 by 30.

20 https://www.sas.org.uk/resource/water-quality-report-2023/

21 England Bathing Water Sites https://environment.data.gov.uk/bwq/profiles/ Wales Bathing Water Sites https://environment.data.gov.uk/wales/bathing-waters/profiles/

22 https://questions-statements.parliament.uk/written-questions/detail/2024-12-17/20876/

23 https://www.bbc.co.uk/news/articles/cx24xy8zgp4o

24 https://www.bbc.co.uk/news/articles/cjr1q89qw8no

25 https://five.epicollect.net/project/water-quality-monitoring-network

26 https://www.riverflies.org/cartographer

27 https://friendsoftheriverwye.org.uk/news/nrw-failing-to-use-our-water-quality-data-to-fight-pollution

28 https://theriverstrust.maps.arcgis.com/home/item.html?id=b861ba0d205046eebde8b2ddfd5bc12a

29 Pg 3: Agriculture and Rural Land Management Challenges for the Water Environment, 2021, The Environment Agency

30 Office for National Statistics (2023) National Park residents England and Wales: Census 2021. Available at: National park residents, England and Wales - Office for National Statistics (ons.gov.uk)

31 National Parks England. Available at: Sustainable Tourism and Recreation: National Parks England

32 The Urban Waste Water Treatment (England and Wales) Regulations 1994

33 https://lordslibrary.parliament.uk/river-pollution-and-the-regulation-of-private-water-companies/

34 https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework/protected-landscapes-targets-and-outcomes-framework

35 https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes

36 https://onlinelibrary.wiley.com/doi/10.1002/etc.5973


CAMPAIGN for NATIONAL PARKS
YMGYRCH y PARCIAU CENEDLAETHOL
The Rivers Trust