

## Consultation Response to *Shaping the Future of Water Governance in Wales Green Paper*

April 2026

### Summary

We have a once-in-a-lifetime opportunity to reform water in England and Wales following the Cunliffe review. This Green Paper from Welsh Government offers the opportunity to put National Parks in Wales at the heart of delivering a clean, healthy and safe water environment for all.

This is a critical moment, and as CNP's *Rivers at Risk Report* showed in 2025, our precious National Parks are not immune to the pressures of sewage overflows, agricultural and industry pollution.

Our response focuses on the need to invest in National Parks as part of the solution, through nature-based solutions, landscape recovery, infrastructure investment, tree planting and many other opportunities to improve our water systems at source.

The water industry must play its part, making a concerted effort to further the purposes of National Parks and investing in aging rural infrastructure. Sewage overflows inside National Parks are spilling on average twice as long as outside National Parks.

Plans for new water legislation in 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.

Statutory water targets for National Parks should be set (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 Welsh Government must urgently strengthen the "have regard" duty on public bodies, including water companies.

**Campaign for National Parks and the Alliance for Welsh Designated Landscapes**

## Chapter 1: Our Strategic Direction for Water in Wales

Question 1: What factors or priority areas should Welsh Government consider when setting the strategic direction for the water system in Wales?

- We agree that a new strategic direction for the water system in Wales is needed to better unite a complex web of cross-sector water management plans, regulations, sub-groups and legislation that have led to siloed thinking, indecision and inaction in recent years.
- As the consultation document highlights, at the heart of this new strategic direction needs to be the better integration and prioritisation of sectors such as agriculture which have a significant impact on the health and resilience of our water environment but have not previously been prioritised.
- The new strategic direction must also recognise and prioritise the international protected status of National Parks which are major water sources for the country with immense potential to deliver a range of strategic outcomes for improved water management in Wales.
- The proposed reforms have the potential to unlock the potential of National Parks to improve the water environment at scale. Through natural flood management schemes, sustainable upland management incentives, river restoration and peatland recovery projects, National Parks have a significant but often underplayed role to play in improving outcomes downstream such as water retention and hydraulic regulation, water purification, pollution control and nature restoration.
- For these outcomes to be realised, we need to see the appropriate level of strategic investment directed towards National Parks. Whether this is through directly funding National Park Authorities or focusing on specific projects such as peatland restoration, tree planting, sustainable land use (SFS and Ffermio Bro), re-meandering rivers or other projects in collaboration with the recently announced 'Nature Estate', our National Parks cover 20% of land in Wales and should be leading from the front.

- Unfortunately, this strategic prioritisation of National Park waterways remains limited beyond the small mention of water in the [Term of Government Remit Letter](#), some targeted actions in National Park Management Plans, and the ambitions set out in the [Biodiversity Deep Dive](#) to ‘unlock’ their potential in future years.
- The 2015 *Water Strategy for Wales* fails to mention National Parks once, and its lack of milestone setting or review process has failed to keep pace with a growing focus on landscape recovery in our National Parks as a key driver of climate resilience and nature recovery.
- If supported with the appropriate levels of ambition and finance, National Park Authorities can help drive NbS, strategic planning functions, transitions to sustainable agricultural practices, and the coordination of nutrient management zones and catchment management plans. By prioritising early intervention on water in our National Parks the benefits for the nation will be seen far beyond their boundaries.
- We would also like to see a strategy that ensures that Natural Resources Wales (NRW) makes full use of the powers it already has in statute with a cultural reset on how regulation and monitoring regimes are delivered at an appropriate scale.
- The highest possible standards need to be set in our National Parks with the right duties, targets and legislation in place to enable them to do so. Currently 48% of rivers in Welsh National Parks are failing to meet good 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).
- Pembrokeshire Coast National Park is particularly impacted by agricultural pollution with the majority of river water bodies failing due to the agriculture and rural land management sector (86%)

- Sewage overflows inside the National Parks are spilling on average twice as long as outside National Parks.

Question 2: How can the Price Review Forum and a potential Ministerial Statement of Water Industry Priorities (MSWIP) best support transparency and effective delivery? If introduced, what priorities should MSWIP include?

- We support the setting of a 25-year strategy containing ambitious milestones set inline with the price review cycle. As part of this, the introduction of a complementary 5-year Ministerial Statement for Water Industry Priorities (MSWIP) is welcomed so that investment decisions can remain collaborative and targeted.
- The consultation document outlines how separation between environmental and economic regulation will be maintained in Wales. We welcome this, but we also recognise that it is vitally important that joined up thinking between the two is maintained so that affordability for the customer isn't prioritised over environmental performance. As such, collaboration across sectors is vital in the preparation of the MSWIP which may prove to be an effective mechanism of outlining shared strategic goals if broadly consulted on.
- The principles of consultation within the existing Price Review Forum must not be lost entirely and the MSWIP should enhance existing processes if this is to be considered a step forward. We would like to see the inclusion of National Park Authorities in any consultation process of the MSWIP.
- We also believe that the MSWIP would benefit from having a specific requirement to outline how water industry priorities will further the purposes of National Parks. We would like to see the introduction of a specific duty introduced for the water industry to demonstrate how they will further the purposes of National Parks in their investment strategies. This should be similar, if not more ambitious, than the [\*Protected Landscapes Duty\*](#) in England.
- We do caution that relying on customer bills to set investment decisions from water companies will not be enough to ensure that environmental

stewardship is prioritised in our National Parks. Innovative green finance initiatives, a robust Sustainable Farming Scheme (especially in the collaborative and optional layers), peatland restoration and fully funded regulation and enforcement from NRW will need to be prioritised if the levels of investment are to be commensurate with the level of need.

Question 3: What milestones or review mechanisms should be built into the strategic direction to ensure accountability and alignment with Welsh priorities?

- Water quality in National Parks should be improving demonstrated in state of the park reports
- Welsh Government 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 set by the Environment (Principles, Governance and Biodiversity Targets) Act.
- We would question the current effectiveness of the Wales Water Management Forum which has met only twice in the past two years, neither of which has seen National Park Authority representation in attendance. How will this forum fit in future strategic decision making?
- The review mechanisms need to be clearly articulated as part of the writing of the 25-year strategy, but we know that cross-sector engagement will be fundamental to its success.

## Chapter 2: Planning Together for a Resilient Welsh Water System

Question 4: Do you support establishing a National System Planning Function for the water sector in Wales? Where should it sit, within the new economic regulator, as an independent body, or integrated into another Welsh Government or arms length body functions?

- At this early stage of development, we support the move toward a single National System Planning Function but believe that it should be independent and sit outside the economic and environmental regulators so that it's advice can be truly holistic.
- We also recognise and stress the importance of the consultation document's commitment to maintaining regional catchment planning functions. National Park Authorities have a very important role to play as statutory planning authorities, contributing a great deal to place-based water management plans. This can include the implementation and approval of NbS, delivery of Local Development Plans, everyday planning decisions and the management of nutrients in vulnerable catchment areas.

Question 5: How should water industry investment planning cycles (e.g. 5, 10, and 25 years) balance affordability, resilience, and environmental priorities?

- Water industry investment planning must take full account of National Park Management plans. With a strengthened duty of regard in place, Water Companies would be required to better prioritise spending in National Landscapes to further the purposes of National Parks, rather than considering investment as an after thought.
- Under-investment in rural sewage works, nature-based solutions or better adapting land owned by water companies in National Parks is leading to compounded issues downstream.
- National Parks contain industry critical water infrastructure (such as reservoirs) and in Bannau Brycheiniog National Park, water companies own 4.8% of the land so are a significant land holder. Regular investment

decisions need to be made at least every five years with long-term investment decision making front of mind which also considers the impact they can have through their land holdings.

### Chapter 3: Modernising our Legislative Framework in Wales

Question 8: Do you agree the current water legislative framework for Wales requires amendment? Which areas should be prioritised for review, and why?

- Yes, we agree that there are areas of the water legislative framework in Wales which require amendment, but it is vitally important that a future Welsh Government must not water down existing regulations such as the rules for landowners and farmers in nitrate vulnerable zones.
- A review of the legislative framework should not start with the presumption of de-regulation but instead focus on consolidation, clarity and improved implementation of current legislation. We are supportive of the recent statutory review of the Control of Agricultural Pollution Regulations for example, and it is vital that action on the recommendations is not delayed.
- Broadly we believe that Natural Resources Wales have the legal powers they need, but much improved enforcement and monitoring regimes are required to ensure compliance. This will require a cultural shift and a significant boost to NRW's resourcing.
- One priority for review should be the strengthening of the "have regard" duty on public bodies for National Park purposes which is outlined in Section 11A of the *National Parks and Access to the Countryside Act 1949*.
- All relevant authorities in Wales have a duty to 'have regard to' the purposes of National Parks in respect of their functions which affect land in Designated Landscapes, but this has not resulted in a strategic focus from water companies in Welsh National Parks.
- In England, a strengthened public duty was secured for protected landscapes through [section 245 of the Levelling-up and Regeneration Act 2023](#). Relevant authorities must now 'seek to further' the statutory purposes

of Protected Landscapes in England. This replaced the previous duty which still remains the same in Wales even though the Designated Landscapes Biodiversity Deep Dive working group recommended that this duty is currently “sub-optimal” and needs to be strengthened.<sup>1</sup> This improved duty has also been a recommendation since the 2015 *Independent Review of Designated Landscapes*.<sup>2</sup>

- An improved duty on Local Authorities, Natural Resources Wales, Dwr Cymru Welsh Water and Hafren Dyfrdwy Cyfyngedig to ‘further’ the purposes of National Parks would ensure that their investment decisions and actions align much more proactively with the purposes of National Parks and the management plans set by National Park Authorities which should include specific actions on improving the water environment.
- The most toxic chemicals, including neonicotinoids used in agriculture and spot-on veterinary flea treatment and wormers must be banned.
- The banning of burning on precious peatland habitats must also be banned in line with legislation in England. Combined with efforts to rewet peatlands will reduce flood and fire risk.

Question 9: Should public health outcomes and nature-based solutions be incorporated into future water legislation?

- Absolutely. The interrelation between clean water and public health outcomes is unquestionable and needs to form a cornerstone of future water legislation, including WFD regulations.
- Similarly, the power of NbS to bring multiple benefits to health, the environment, urban infrastructure and flood resilience must not be underestimated. National Parks must play an important role in a significant scaling up of NbS.

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<sup>1</sup> “The duty of regard is currently sub-optimal. The group recommends setting up a National Relevant Authorities Forum supported by an update of the current s62/s85 guidance in order to coordinate a more strategic response to exercising the duty” – [Working Group meeting notes 11<sup>th</sup> April](#).

<sup>2</sup> <https://www.gov.wales/written-statement-update-review-designated-landscapes-wales>

- The Water Framework Directive in Wales should be maintained as it is an essential and broadly well-designed piece of legislation. However, we agree that it could also benefit from the reform to existing processes of assessment and the inclusion of health outcomes. There is a clear need for improvements to the way WFD monitoring programmes are administered and funded to provide consistent data sets. WFD monitoring is used as a core part of National Park Authority *State of the Park* reports, informing management plan targets and outcomes. These need to be cut to National Parks and made more readily available for to the public for review.

Question 10: What innovations or enforcement approaches could strengthen compliance for wastewater and drainage?

- Wastewater treatment works in National Parks are designed to a much lower standard 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 treatment or advanced treatment, leading to high levels of pharmaceutical and chemical pollution in National Park water bodies.
- CNP's [Rivers at Risk](#) report found that sewage overflows inside Welsh National Parks are spilling on average twice as long as outside National Parks. In 2024 CSOs in National Parks across England and Wales discharged for a quarter of a million hours (254,808), with Eryri being the second worst affected (47,187 hours).
- In National Parks all sewage treatment works should be required to have at least secondary treatment and be sufficiently sized and modernised to cope with higher levels of rainfall and discharge.
- We welcome a review of the Urban Waste Water Treatment regulations 1994 and we want to see Welsh Government set statutory water targets for National Parks, including water companies being required to improve all storm overflows that discharge into National Parks by 2035. This needs to be backed by an improved duty on water companies to further the purposes of National Parks and robust enforcement from NRW.

#### **Chapter 4: Strengthening Welsh Water Regulation and Accountability**

Question 11: Subject to enabling powers being provided to Welsh Government, do you agree with the proposal to establish a new, stand-alone economic regulator for water in Wales?

- Yes. In the Welsh context we feel that it is important that a new economic regulator for Wales is established, but that it is kept separate to the environmental regulator. Natural Resources Wales should be left untouched in its functions surrounding water management, but its resourcing, funding and capacity remains an issue which needs to be addressed urgently.

Question 17: Do you agree that tighter regulatory control on the application of sewage and septic tank sludge to land in Wales is required?

- **Yes** - Why do you think tightening regulatory oversight is required? Please provide evidence if possible

There is a significant problem of nutrient overload in our rivers, and the existing regulation is outdated and ineffective in managing both intensive agricultural spreading and sludge spreading from water companies.

- No - Why do you think tightening regulatory oversight is not required?

If yes, which option do you consider most appropriate? (Select ONE):

- **Option 1: Apply full EPR control**
- Option 2: Voluntary approach adapting Biosolids Assurance Scheme and Code of Practice
- Option 3: EPR control with earned recognition adaptation
- Option 4: Amend Sludge Use in Agriculture Regulations and underpin with regulator-approved Biosolids Assurance Scheme
- Option 5: Do Nothing

Why did you select this option? What are its advantages and disadvantages? Please feel free to suggest any counter proposals, submitting evidence where possible.

- All land spreading should come under EPR control, but we are concerned that NRW are not resourced enough to best manage the control of diffuse rural pollution.