

## **CABINET RESPONSE TO THE REPORT OF THE ENVIRONMENTAL SCRUTINY COMMITTEE ENTITLED “RESTORE OUR RIVERS”**

### **MEASUREMENT & BENCHMARKING**

#### ***Recommendation 1***

*Cardiff Council’s Scrutiny Research Team has created a report to support this task & finish exercise titled ‘River Pollution in Cardiff: Background on the Ely, Rhymney and Taff’. This report documents the current condition of the three rivers (particularly the Ely) and highlights the issues that they currently face. The task group recommends that this report is used as a starting point against which the achievements of the Restore Our Rivers task & finish exercise can be measured.*

#### **RESPONSE: The principle of the recommendation is accepted**

Whilst the principle of this recommendation is supported, it is not clear who will lead with taking the findings of the report forward but the production of a report reviewing the specifics of the River Basin Management Plan for the Severn Estuary in Cardiff is welcomed.

It is not considered that the City of Cardiff Council have a requirement to input into this recommendation. However, prioritised support will be offered where finances and resources permit.

### **PREVENTION OPPORTUNITIES**

#### ***Recommendation 2***

*The partners involved with the task & finish exercise and other public bodies need to work closely with Dwr Cymru to raise the profile of pollution issues by supporting the following campaigns:*

- *‘See it – Report it – Stop it’ – a campaign aimed at raising the profile of self-reporting on misconnections, sewer abuse and other pollution incidents;*
- *‘Let’s Stop the Block’ – a campaign which raises the profile of what can and can’t be flushed down the toilet;*
- *‘ConnectRight’ – a campaign which raises the profile of ensuring that properties are properly connected to the drainage system;*

- *‘Restore Our Rivers – River Ely Survey & Clean’ – a survey and clean of the River Ely which is to be led by Keep Wales Tidy and supported by the partners involved with the task & finish exercise*

*It was felt that a partnership approach which integrated the voice of all the task & finish exercise partners and other public bodies would be the best way to project these messages to the largest possible audience. In particular, integrating the messages through the communications functions of all of the bodies was seen as essential; they would all be able to use existing systems to share the messages through formats like social media, email networks, internal publications, press briefings and websites.*

#### **RESPONSE: The principle of the recommendation is accepted**

Partnership working is welcomed as it has proven to be an effective tool and this is supported by the Council. This would need sign up from all the relevant organisations. A good relationship already exists between the City of Cardiff Council and Dwr Cymru Welsh Water, particularly in regard to misconnections. It is hoped that the findings of this report and this recommendation will further enhance this relationship.

The integration of communications across the relevant bodies is welcomed to increase the audience.

#### **Recommendation 3**

*Improving the water quality of the rivers in Cardiff involves taking a whole river catchment approach and not just addressing specific problems in Cardiff. As a consequence, the partners involved with the task & finish exercise need to work together to gain the support of all of the local authorities within the South East Wales River Basin, i.e. Cardiff, the Vale of Glamorgan, Rhondda Cynon Taff, Merthyr Tydfil and Caerphilly. Only by working across the whole South East Wales River Basin can real long term improvements be achieved. Working in this type of collaborative way would help build connections and enhance the multi-agency working approach.*

#### **RESPONSE: The principle of the recommendation is accepted**

A collaboration approach is supported and welcomed by the City of Cardiff Council. The status of the Main Rivers in Cardiff are inherently affected by processes in the upper catchment areas within the South East Wales Valleys Catchment. Therefore, the City of Cardiff Council and their partners need the support and action from bodies situated in the upper catchment to facilitate improvement in water quality through the South East Wales catchment.

Key finding 8 proposes that the City of Cardiff Council are best placed to develop these relationships; however, this is not supported. As the delegated competent body, it is recommended that Natural Resources Wales initiate these communications and are approached to facilitate this role as they have oversight of the catchment.

#### **Recommendation 4**

*The partners involved with the task & finish exercise should work to establish a common water pollution contact data base for the whole South East Wales River Basin. This it was felt should improve partnership working and ultimately drive water quality improvements in our rivers. The data base should include details of all key contacts from each of the partners involved with the task & finish exercise and all local authorities within the South East Wales River Basin. Each of the partners and other local authorities should provide a list of relevant staff along with a contact number and address.*

#### **RESPONSE: The principle of the recommendation is accepted**

A common water pollution contact database is supported to allow rapid dissemination of information and enhance collaboration through the catchment. As the designated responsible body, it is recommended that this is Natural Resources Wales are the custodians of this database. The City of Cardiff Council should provide the relevant contacts to the body tasked with compiling the database.

#### **Recommendation 5**

*The Swansea Loose Connections Project is an excellent example of how partnership work can improve water quality. Surveying a river system to identify misconnections and then addressing the problems at source is a very effective way to achieve quick improvements in water quality. The partners involved with the task & finish exercise should in part look to copy this approach and conduct a river survey to identify any misconnection issues. Should any misconnections be identified then appropriate action should be taken to address the problem.*

#### **RESPONSE: The recommendation is supported but not fully accepted**

Currently, dealings with misconnections are dealt with as and when they are identified. The City of Cardiff Council closed the post that investigated misconnections on a proactive basis and the The City of Cardiff Council no longer have the resources to undertake misconnection surveys on a proactive basis.

The responsibility to identify misconnections rests with Dwr Cymru Welsh Water as the statutory sewerage undertaker. Currently, partnership working between Dwr Cymru Welsh Water and the City of Cardiff Council is already ongoing and adheres to the principles of the *Investigation and rectification of Drainage Misconnections* good

practise document. This process is implemented when a pollution incident is reported and involves DCWW leading the investigation with the Council and NRW providing help where resources permit.

The City of Cardiff Council support the principle of this recommendation should another body be able to undertake these proactive surveys.

### **Recommendation 6**

*Dwr Cymru, Natural Resources Wales and the five local authority areas should reinstate the historic quarterly meetings to discuss the issue of misconnections. It was felt that this approach would improve partnership working and help identify problem misconnections.*

#### **RESPONSE: The principle of the recommendation is accepted**

The partnership working is best advised to be between Dwr Cymru Welsh Water, Natural Resources Wales and individual Local Authority, if resources permit. It should be noted that this would require the attendance of a Council FTE and resourcing would need to be considered.

In accordance with the *Investigation and rectification of Drainage Misconnections* good practise document, it would be recommended that Dwr Cymru Welsh Water initiate such quarterly meetings.

There is already a good relationship between Dwr Cymru Welsh Water and the City of Cardiff Council where specific misconnections have been identified.

### **Recommendation 7**

*Councillor awareness around the issue of misconnections, sewer abuse and river water quality should be improved. The partners involved with the task & finish exercise should work together to create a short presentation or training package which could be made available to Councillors in the five local authorities of the South East Wales River Basin. Such a presentation or training package should be made available as part of the 'Member Induction' process which will be rolled out after the local government elections in May 2017. The presentation or training package should also be made available to community councils and planning committees. The profile of misconnections should also be raised within the Building Control teams of local authorities to ensure that drainage plans are properly completed by developers.*

#### **RESPONSE: The principle of the recommendation is accepted**

This recommendation does not have Cardiff Council involvement and is a commitment for the partnership. Whilst this is not considered a pressing action, the awareness of misconnections for local members would be beneficial.

It is not considered that the City of Cardiff Council have a requirement to input into this recommendation but where required, will aid where finances and resources permit.

### **Recommendation 8**

*Dwr Cymru and Natural Resources Wales felt that working closely with local authority environmental health services was a highly effective way of target and deal with misconnections and sewer abuse. The partners involved with the task & finish exercise agreed with this approach. As a consequence, they would like Dwr Cymru, Natural Resources Wales and the environmental health teams of the five local authority areas to discuss the feasibility of:*

- *Carrying out a check to ensure that all food establishments have grease / fat traps and enzyme dosing systems in place and to carry out a check for general misconnections – they currently only check to see if used oil is collected and taken away;*
- *Establishing closer working links between Environmental Health Officers and Dwr Cymru Sewer Network Abuse Protection Technicians – in particular around fat oil and grease issues where the Dwr Cymru officers are able to provide valuable support;*
- *Where the need arises, Environmental Health Officers and Dwr Cymru Sewer Network Abuse Protection Technicians carry out joint inspections;*
- *Environmental Health Officers carrying Dwr Cymru 'Let's Stop the Block' literature so that they can provide copies to food establishments where they deem appropriate;*
- *When there is a change of premises use to a class A3 food establishment, the occupants are made aware of their responsibilities in terms of fat, oil and grease management;*
- *Issuing all food establishments with free fat funnels to help increase the recycling of fat, oil and grease.*

### **RESPONSE: The principles of the recommendation is accepted**

The collaborative approach to deal with misconnections is accepted as good practise. Commitment from Cardiff Council's Environmental Health team would be needed. Whilst this collaborative approach is supported, this partnership working is already a requirement of *Investigation and rectification of Drainage Misconnections* good practise document. The City of Cardiff Council already work closely with Dwr Cymru Welsh Water and Natural Resources Wales with regard to misconnections.

The issuing of food establishments with fat free funnels to help increase recycling of fat, oil and grease is not the responsibility of the City Of Cardiff Council.

### **Recommendation 9**

*The partners involved with the task & finish exercise agreed with the need to undertake a survey and clean of the River Ely. This exercise should be project managed by Keep Wales Tidy with support being provided by the partner groups associated with the task & finish exercise. Keep Wales Tidy should explore a range of funding options to support this work and engage with volunteer groups to deliver a survey and series of prioritised tasks. The exercise should involve a survey, litter picks, river blockage removals, habitat management work, invasive species management and educational initiatives. The river survey should take place in January / February 2017 and the results from this work should then be used to prioritise tasks for river clean events which should take place in spring 2017.*

#### **RESPONSE: The principles of the recommendation are accepted**

This recommendation is principally directed at Keep Wales Tidy but a survey and clean of the rivers is welcomed by this authority. The actions listed in the recommendation impact on the Main River and it is advised that Natural Resources Wales are made aware of the actions as they are the statutory body responsible for Main Rivers.

It is not considered that the City of Cardiff Council have a formal requirement to input into this recommendation but where required it will aid where finances and resources permit.

### **Recommendation 10**

*All the partners in the task & finish group agreed that promoting best practice in the uses of SUDS (sustainable urban drainage systems) as highlighted in the Welsh Government non-statutory guidance (December 2015), was the best way forward. Projects like Greener Grangetown provided clear evidence of the multi-benefits of using natural vegetation and the environment to better manage surface water. Consistent design standards and achievable maintenance schedules would give greater confidence for local authorities to promote more vegetation based SUDS systems within SPG documents. The group would recommend that all five authorities adopt a consistent approach to SUDS design and management.*

#### **RESPONSE: The principles of the recommendation is accepted**

This principle of the recommendation are accepted but the development of a consistent SuDS design and management document between the relevant local authorities is not supported. A number of the relevant authorities have already

commenced the production of a guidance at a cost to the authority and there would be no willingness to disregard what has been undertaken to date.

Welsh Government are currently looking to implement Schedule 3 of the Flood and Water Management Act 2010. This will create a SuDS Approval Body that considers SuDS application and will provide a technical approval. This will be subject to a national guidance and mandatory adoption of the SuDS.

### ***Recommendation 11***

*The partners involved with the task & finish exercise agreed with the view that it was important to target frequent river users as a valuable source for reporting river pollution incidents. Anglers, canoeists, walkers and volunteer groups were all suggested as a good source for reporting river pollution incidents. The task & finish partners, therefore, recommend that Dwr Cymru and Natural Resources Wales work with the other partners to build up a key stakeholder contact list with a view to using it to distributing regular updates and other information relating to the self-reporting of river pollution incidents. The group also felt that Dwr Cymru should review the potential role of using new technology (for example, smart phones and apps) to make self-reporting quick and easy.*

#### **RESPONSE: The principles of the recommendation is accepted**

This is considered similar to the principles of Recommendation 4. It is recommended that Natural Resources Wales are approached by the partners to become the custodians of the contact list.

It is not considered that the City of Cardiff Council have a requirement to input into this recommendation but where requested, will aid where finances and resources permit.

### ***Recommendation 12***

*The River Ely Survey and Clean should be used as a tool to identify and record if there are any farm pollution problems on the river system. If any farm pollution issues are identified, then the task & finish partner organisations should review what can be done to address the problem(s). Any significant farming pollution problems should be reported to Natural Resources Wales who are the best placed organisation for dealing with such problems.*

#### **RESPONSE: The principles of the recommendation are not accepted**

Natural Resources Wales are the responsible body for enforcing pollution incidents. The use of volunteer partners to investigate farm pollution problems is welcomed given the diminishing resources of Natural Resources Wales.

It is not considered that the City of Cardiff Council have a requirement to input into this recommendation but where required, will aid where finances and resources permit.

## **EDUCATIONAL OPPORTUNITIES**

### ***Recommendation 13***

*During the task & finish exercise 14 awareness raising campaigns and educational promotions were identified which the group felt could provide additional benefits / support to rivers and watercourses in the South East Wales River Basin. These were:*

- *The Yellow Fish Campaign;*
- *The Hydro Power & Schools Campaign;*
- *The Salmon Homecoming Project;*
- *The Eel Programme;*
- *The Natural Resources Wales 'Healthy Rivers Campaign';*
- *The Capital Investment Campaign;*
- *The 'Let's Stop the Block' Campaign;*
- *The 'Clean Water Campaign';*
- *The Keep Wales Tidy 'Great Taff Tidy within Cardiff';*
- *The Ely top to toe survey and river clean;*
- *The Natural Resources Wales 'Slurry Pollution Campaign';*
- *The 'See it – Report it – Stop it' campaign;*
- *The 'Natural Resources Wales' programme.*

*All of the task & finish partner organisations and the five local authorities from within the South East Wales River Basin should work together to amplify the key messages of these and other new campaigns across the whole area using a combined and well-structured communications approach, for example, if Dwr Cymru is looking to spread the message of the 'Let's Stop the Block' campaign then they should not do it in isolation. Instead, they should pass the message onto all of the other partner groups for communication across a wide range of distribution channels, for example, social media, internal briefings & messages, websites, press releases, etc..*

### **RESPONSE: The principles of the recommendation are accepted**

The recommendation identifies a number of Dwr Cymru Welsh Water campaigns and supports a partnership approach. This recommendation is supported in principle.



It is recommended that the Council's Media department are contacted to agree this recommendation.

#### **Recommendation 14**

*The task group felt that elements of the Yellow Fish Campaign and messages from the Echo Schools educational programme should be added to the Welsh Baccalaureate curriculum. This they believe would help raise the profile of the importance of maintaining healthy rivers within the younger generation. The task group, therefore, recommends that the partner organisations involved with the task & finish exercise contact the WJEC with a suggested educational proposal based upon healthy rivers and discuss the possibility of having this included as an element within the Welsh Baccalaureate curriculum.*

#### **RESPONSE: The principles of the recommendation are accepted**

Education is considered to be a critical element in promoting sustainable process with regard to our Main Rivers. The principles of the recommendation are supported and whilst there are no actions on the council, help will be provided where requested and where finances and resources commit.

#### **Recommendation 15**

*During the task & finish exercise it became clear that a number of different groups and organisations were promoting a diverse range of campaigns and educational initiatives aimed at improving the health of our rivers and watercourses. While all of this work was viewed as positive, there was no single point to gather, distribute and effectively amplify the messages across the whole South East Wales River Basin. As a result, the task & finish exercise recommends that a central website is created to act as a single point of contact for people and groups interested in improving the health of our rivers and watercourses. To ensure that the site website works effectively key features of the site should include:*

- *The site should act as a single point of contact to store or signpost visitors to the relevant information or messages provided by each of the partner organisations;*
- *When a partner organisation posts a new message or piece of information it should trigger an automatic notification to the partner organisations informing them of the new posting. This would then allow the partner organisations to circulate the message via their communications function;*

- *That one partner should probably have responsibility for hosting the site, however, all partners should have the ability to upload or post any new information onto the site;*
- *That an information sharing protocol should be established between the partners - any new organisations joining the partnership should also be bound to this information sharing protocol;*
- *That all legalities of establishing such a partnership website should be explored and understood at the outset;*
- *For practical purposes, such a system would need to be cost effective, simple and easy to use*

**RESPONSE: The principles of the recommendation are accepted**

Whilst the principles of a central website are supported, the reality of maintaining a website means that this is considered an aspiration. All regulatory bodies (NRW, CCC and DCWW) have their own websites and sign post to the relevant body, where relevant. Finance, resourcing and lack of principle website custodian would need to be agreed prior to commitment.

It is not considered that the City of Cardiff Council have a requirement to input into this recommendation but where required, will aid where finances and resources permit.

### ***Recommendation 16***

*Due to ongoing budget pressures, the task group recommends that the communications functions of each of the partner organisations should use cost effective communications tools to promote information and messages around improving the health of our rivers and watercourses. In particular, each of the groups could use social media, internal publications / communications, organisation websites, media briefings and other stakeholder communication tools.*

**RESPONSE: The principles of the recommendation are accepted**

The promotion of information and initiatives by Dwr Cymru Welsh Water, Natural Resources Wales and the City of Cardiff Council is already undertaken. In conjunction with Recommendation 3, the use of social media would be supported.

This would need agreement from the media team to agree the provision of information from other regulatory bodies.

## **IMPROVEMENT OPPORTUNITIES**

### ***Recommendation 17***

*Local authorities and the partner organisations associated with the task & finish exercise have in recent years worked well with volunteer groups to deliver a large number of projects aimed at improving local rivers and enhancing the wider natural environment. The task group endorses this work and recommends that even more is done to increase the good work that they deliver. Examples of additional support include:*

- *The development of a list of river improvement and environmental habitat improvement projects which as volunteer and supporting resources become available could be allocated to a suitable group, i.e. creating a situation where volunteer groups can be signposted to appropriate projects. Potential projects could be identified from the results of the River Ely survey, which is scheduled for January / February 2017. The identified projects could be collated into a river improvement based action plan.*
- *Publicising the good work of the volunteer groups through the communications functions of the partner organisations of the task & finish exercise. This would help raise the profile of the excellent work that they deliver and potentially encourage other people to follow their example and become volunteers.*
- *Helping the volunteer groups form links with businesses and other organisations able to provide additional support for the work that they undertake. This it is felt would help improve partnership working in this area.*
- *Helping to signpost the volunteer groups towards potential funding sources to help fund the important work that they undertake.*

*Creating a group or body to provide the facilitation role for river based improvement work in the South East Wales River Basin. They could develop project ideas and oversee the resources available before arranging for the work to be delegated to the volunteer and other groups*

### **RESPONSE: The principles of the recommendation are agreed**

It is considered that volunteer groups contribute a significant amount to improving the river quality. The recommendation does not determine who is the best organisation to lead on this but given that Natural Resources Wales are the regulatory body responsible for Main Rivers, it is considered that they would be best placed to facilitate these groups.

It is recommended that the partnership contact Natural Resources Wales and request that they facilitate the organisation of volunteer groups

### **Recommendation 18**

*The Cardiff Scrutiny Research Team produced a report titled 'Restore Our Rivers: Best Practice in Managing Ecological Issues'. This focused on best practice in the management of misconceptions; littering & pollution; and enhancing biodiversity & managing alien species. Having reviewed the findings of the report the task group recommends that the following best practice is followed in the South East Wales River Basin and built into the work of the Restore Our Rivers task & finish exercise:*

- **Misconnections** - *That the guidance and resources from the National Misconnections Strategy Group and their public face 'Natural Resources Wales' are followed to help educate property owners and builders about the negative effects of misconceptions and how to avoid them.*
- **Misconnections** – *That the partner organisations associated with the task group work together to raise funds to undertake a survey of the river from its source to identify misconceptions and seek rectifications; and consider a 'misconnections amnesty' to achieve widespread corrections.*
- **Litter & Pollution** – *To make use of community groups and coordinate different volunteer resources to undertake river cleans, starting upstream for most efficient practice.*
- **Enhancing Biodiversity & Managing Alien Species** - *Investigate the merits and feasibility of planting trees as a cost effective means of stabilising river banks and increasing biodiversity.*
- **Enhancing Biodiversity & Managing Alien Species** - *Note the guidance given by DEFRA and the Non Native Species Secretariat on preventing the spread of invasive species and use these to educate and inform property owners; and to produce risk assessments and develop codes of conduct to reduce risks.*
- **Enhancing Biodiversity & Managing Alien Species** - *Engage with landowners or make use of volunteer groups or to carefully treat Himalayan Balsam and Japanese Knotweed by the methods outlined in the Scrutiny Research Best Practice Report.*

### **RESPONSE: The principle of the recommendation is agreed**

Best practise documents have been produced to reflect the current legislative guidance and requirements and look to build on experiences. The partnership working between the City of Cardiff Council, Natural Resources Wales and Dwr Cymru Welsh Water use best practise documents in their management of ecological issues.

The City of Cardiff Council will look to continue partnership working using this best practise document. This recommendation places no formal requirement on the City of Cardiff Council.

## **REGIONAL OPPORTUNITIES**

### ***Recommendation 19***

*A new Regional Development Plan should include consistent supplementary planning guidance to support development across the whole area. The task group believes that this represents a good opportunity to implement a consistent and sustainable approach to development across the region which would support rivers and other watercourses. For example, they felt that significant improvements to rivers could be achieved if supplementary planning guidance stipulated the implementation of sustainable drainage solutions and that the implementation of these was properly monitored.*

### **RESPONSE: The principle of the recommendation is agreed**

This principle of the recommendation is accepted. The City of Cardiff Council is already in the process of finalising a Sustainable Storm Water Management SPG to promote sustainable drainage within new developments. The requirement for development to have consideration of the goals of the Wellbeing and Future Generations Act will deliver sustainable development and enhance the environment.

In addition, Welsh Government are currently looking to implement Schedule 3 of the Flood and Water Management Act 2010. This will create a SuDS Approval Body that considers SuDS applications and will provide a technical approval. This will be subject to a national guidance that introduce a number of requirements for sustainable drainage.

### ***Recommendation 20***

*A South East Wales River Basin working group should be created to oversee the delivery of river and watercourse improvements. The task & finish exercise partners recommend that the group should:*

- *Coordinate shared resources, skills and knowledge from across the whole South East Wales River Basin;*
- *Hold a documented summary on the condition of the rivers and watercourses across the whole South East Wales River Basin;*
- *Monitor and document changes across the rivers and watercourses of the South East Wales River Basin;*
- *Coordinate the development of an action plan which would set out work priorities required to drive improvement across the South East Wales River Basin;*

- *Provide a facilitation and allocation role for South East Wales River Basin action plan;*
- *Identify funding sources that can be accessed by group members (or associated stakeholders) to undertake work;*
- *Include representation from the five local authorities (Cardiff, the Vale of Glamorgan, Rhondda Cynon Taff, Caerphilly & Merthyr Tydfil) and significant stakeholders (Natural Resources Wales; Dwr Cymru / Welsh Water; Keep Wales Tidy; South East Wales Rivers Trust; Groundwork Wales; key volunteer groups; key river user groups; The Wildlife Trust & key community groups).*
- *Meet on a quarterly basis, keep operational costs to a minimum and rely on contributions in kind (for example, accommodation and staff costs).*

**RESPONSE: The principle of the recommendation is agreed**

The implementation of a working group would be supported in principle but consideration to the commitment from the City of Cardiff Council is needed. Given that the South East Valleys Catchment is within the Severn River Basin District, it is recommended that Natural Resources Wales are approached by the partnership to facilitate this as part of a regional consideration.

**CONCLUSION**

It is agreed that the City of Cardiff Council will write Natural Resources Wales as the competent body to request their views on the Restore our Rivers report and identify any actions they intend to make.