

## Agenda – Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

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Lleoliad:	I gael rhagor o wybodaeth cysylltwch a:
Hybrid – Ystafell Bwyllgora 3	Marc Wyn Jones
Senedd a fideogynadledd drwy Zoom	Clerc y Pwyllgor
Dyddiad: Dydd Iau, 9 Tachwedd 2023	0300 200 6565
Amser: 09.30	<a href="mailto:SeneddHinsawdd@senedd.cymru">SeneddHinsawdd@senedd.cymru</a>

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**Rhag-gyfarfod preifat (09.15–09.30)**

**Cyfarfod cyhoeddus (09.30–12.00)**

- 1 Cyflwyniadau, ymddiheuriadau, dirprwyon a datgan buddiannau**  
(09.30)
- 2 Ansawdd dŵr – Sesiwn dystiolaeth gyda Dŵr Cymru Welsh Water**  
(09.30–10.20) (Tudalennau 1 – 58)  
Peter Perry, Prif Swyddog Gweithredol, Dŵr Cymru Welsh Water  
Mike Davies, Prif Swyddog Ariannol, Dŵr Cymru Welsh Water  
Steve Wilson, Rheolwr Gyfarwyddwr Gwasanaethau Dŵr Gwastraff, Dŵr Cymru  
Welsh Water  
**Dogfennau atodol:**  
Papur briffio gan y gwasanaeth ymchwil – Ansawdd dŵr  
Papur – Dwr Cymru Welsh Water (Saesneg yn unig)

**Egwyl (10.20–10.30)**



- 3 Ansawdd dŵr – Sesiwn dystiolaeth gyda Chyfoeth Naturiol Cymru**  
(10.30–11.10) (Tudalennau 59 – 116)  
Gareth O'Shea, Cyfarwyddwr Gweithredol Gweithrediadau, Cyfoeth Naturiol Cymru  
Mark Squire, Prif Gynghorwr, Prosiectau Strategol, Cyfoeth Naturiol Cymru  
**Dogfennau atodol:**  
Papur – Natural Resources Wales (Saesneg yn unig)

**Egwyl** (11.10–11.20)

- 4 Ansawdd dŵr – Sesiwn dystiolaeth gydag Ofwat**  
(11.20–12.00) (Tudalen 117)  
David Black, Prif Weithredwr, Ofwat  
**Dogfennau atodol:**  
Papur – Ofwat (Saesneg yn unig)

**5 Papurau i'w nodi** (12.00)

- 5.1 Bil yr Amgylchedd (Ansawdd Aer a Seinweddau) (Cymru)**  
(Tudalennau 118 – 137)

**Dogfennau atodol:**

Ymateb ychwanegol gan Lywodraeth Cymru i adroddiad Cyfnod 1 y Pwyllgor ar Fil yr Amgylchedd (Ansawdd Aer a Seinweddau) (Cymru)

Gohebiaeth gan y Dirprwy Weinidog Newid Hinsawdd at y Cadeirydd ynghylch gwelliannau Grŵp 5 i Fil yr Amgylchedd (Ansawdd Aer a Seinweddau) (Cymru)

**5.2 Cyllideb Ddrafft 2024–25**

(Tudalennau 138 – 145)

**Dogfennau atodol:**

Llythyr gan y Cadeirydd at y Gweinidog a'r Dirprwy Weinidog Newid Hinsawdd ynghylch gwaith craffu ar y Gyllideb Ddrafft 2024–25

Llythyr gan Anabledd Cymru at y Cadeirydd ynghylch gwaith craffu ar y Gyllideb Ddrafft 2024–25 (Saesneg yn unig)

### **5.3 Effaith cyhoeddiad Llywodraeth y DU ynghylch polisïau sero net ar gyflawni ymrwymïadau Cymru o ran newid hinsawdd**

(Tudalennau 146 – 147)

#### **Dogfennau atodol:**

Ymateb gan y Gweinidog Newid Hinsawdd at y Cadeirydd ynghylch effaith cyhoeddiad Llywodraeth y DU ynghylch polisïau sero net ar gyflawni ymrwymïadau Cymru o ran newid hinsawdd

### **5.4 Protocol Palma**

(Tudalennau 148 – 149)

#### **Dogfennau atodol:**

Llythyr gan y Prif Weinidog at Gadeirydd y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad ynghylch Protocol Palma

### **5.5 Bil Seilwaith (Cymru)**

(Tudalennau 150 – 151)

#### **Dogfennau atodol:**

Ymateb gan y Gweinidog Newid Hinsawdd at y Cadeirydd ynghylch y Bil Seilwaith (Cymru).

### **5.6 Rheoliadau Rheolaethau Swyddogol (Iechyd Planhigion) (Hysbysiad Blaenorol) a Rheoliadau Amodau Ffytioiechydol (Diwygio) 2023**

(Tudalennau 152 – 153)

#### **Dogfennau atodol:**

Llythyr gan y Gweinidog Materion Gwledig a Gogledd Cymru, a'r Trefnydd, at y Cadeirydd ynghylch Rheoliadau Rheolaethau Swyddogol (Iechyd Planhigion) (Hysbysiad Blaenorol) a Rheoliadau Amodau Ffytioiechydol (Diwygio) 2023

### **5.7 Cydsyniad Deddfwriaethol: Y Bil Ffyniant Bro ac Adfywio**

(Tudalennau 154 – 158)

#### **Dogfennau atodol:**

Llythyr gan Gadeirydd y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad at y Cadeirydd ynghylch y Bil Ffyniant Bro ac Adfywio (Saesneg yn unig)

Llythyr gan Gadeirydd y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad

at y Gweinidog Newid Hinsawdd ynghylch y Bil Ffyniant Bro ac Adfywio  
(Saesneg yn unig)

- 6 Cynnig o dan Reol Sefydlog 17.42 (vi) a (ix) i benderfynu gwahardd y cyhoedd o weddill y cyfarfod heddiw**  
(12.00)

**Cyfarfod preifat** (12.00–12.10)

- 7 Trafod y dystiolaeth a ddaeth i law o dan eitemau 2, 3 a 4**
- 8 Bil Seilwaith (Cymru) – Papur materion allweddol**

(Tudalen 159)

**Dogfennau atodol:**

Papur materion allweddol (Saesneg yn unig)

Mae cyfyngiadau ar y ddogfen hon

Llyr Gruffydd MS  
Chair  
Climate Change, Environment and Infrastructure Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

3<sup>rd</sup> November 2023

Dear Llyr

Thank you for the invitation to give evidence to the Climate Change, Environment and Infrastructure Committee regarding river water quality and sewage discharges. We previously gave evidence to the committee on 3<sup>rd</sup> February 2022 on this matter, sent further information to you in August 2023, and have also written to the Committee in recent months to offer to attend a further session of the committee in light of recent media and political scrutiny of our performance. We therefore welcome the opportunity to give evidence to the committee meeting on 9<sup>th</sup> November.

On Friday, 2nd October, we submitted our draft Business Plan for 2025-30 to Ofwat. If approved, the Plan will result in the company's biggest ever investment programme, worth £3.5 billion investment over the five years, which will be equivalent to a 68% increase on the investment between 2020 and 2025.

A key focus of the Plan is to adopt a collaborative approach to reducing our impact on the environment, in particular, playing our part in helping improve river water quality. We are committing to invest nearly £1.9 billion in the environment between 2025 and 2030 – 84% more than across 2020-25. This will include substantially reducing phosphorous discharges from wastewater treatment to rivers in Special Areas of Conservation and starting on a multi-AMP programme to stop our network of 2,300 storm overflows causing ecological harm to rivers and coastal water in our operating area. We have also invested to tackle around 40 site that new flow monitoring has identified deficiencies in plant operation.

The development of this five year Plan has been shaped by household and business customers and by the strategic steers set by the PR24 Forum led by Welsh Government. It prioritises improving river water quality and addressing the challenge of storm overflows, enhancing key services, and strengthening resilience against the challenges facing the company, in particular climate change.

Funding such an ambitious programme will require customer bills to increase, but we believe that our proposals strike the right balance between investing to improve service for today's customers,

providing sufficient financial support for those who are struggling to make ends meet, whilst also not storing up problems for future generations. This is a difficult balance against a backdrop of increasing customer and stakeholder expectations, more volatile weather conditions due to climate change, and the challenges of the current cost of living crisis.

We do not shy away from these challenges and continue to strive to fulfil our company purpose which was incorporated into our Articles of Association in 2019, that is “to provide high quality and better value drinking water and environmental services, so as to enhance the well-being of our customers and the communities we serve, both now and for generations to come.”

We currently face many operational challenges and performance isn’t as good as we want it to be, but we continue to operate openly and transparently and strive to make the right decisions for the environment and our customers. Where we get it wrong, or our performance fails to meet expectations, our regulators hold us to account and it is only right that there is wider political and media scrutiny.

However, some of the current debate in the media and some of the wider political discourse has been factually incorrect and lacks an appreciation of the current regulatory and policy framework within which the water sector operates. It is right that there should be strong scrutiny and accountability, but such discourse should be cognisant of the legislative and regulatory history and boundaries in which companies work.

The Committee’s report on Water Quality and Sewage Discharges in June 2022 made three specific recommendations relating to our work. I can confirm that two of three have been delivered as previously noted, and the third, relating to the reporting of discharges from storm overflows “within the hour” will be in place for all storm overflows by 2025 as previously announced, but we will be providing such information on our website for bathing waters and high amenity sites from early next year.

Below, I have set out in detail some relevant context and information to inform the Committee’s work.

Please do not hesitate to contact me if you require any further information.

We look forward to providing evidence to you on 9<sup>th</sup> November.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Perry', written in a cursive style.

Peter Perry  
Chief Executive

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## **1. Legislative, Ownership, and Regulatory Context**

Since the water and sewerage industry was privatised in 1989 a regulatory framework has been in place to ensure that consumers receive high standards of service at a fair price. Following the collapse of Hyder who owned Welsh Water and SWALEC in 2000, Glas Cymru acquired Welsh Water in 2001. The company operates within the same legislative and regulatory framework as the other 16 privatised water only and water and sewerage companies in England and Wales. Water and wastewater treatment service in Scotland and Northern Ireland remain public bodies.

Under Glas Cymru's ownership, Welsh Water's assets and capital investment are financed by bonds and retained financial surpluses. The Glas Cymru business model aims to reduce Welsh Water's asset financing cost, the water industry's single biggest cost (see finance section below).

### *1.1 Legislative Context*

Water company boundaries, which are based on water pipe and sewer networks, predate devolution, reflect river catchments rather than the administrative border between Wales and England.

The Government of Wales Act 2006 (GoWA 2006) devolved a number of powers relating to the water industry to the Assembly (now Senedd), including water supply, water resources management (including reservoirs), water quality, consumer representation, flood risk management and coastal protection.

The GoWA 2006 was amended by the Wales Act 2017 (2017 Act). Sections 48- 52, Schedule 7A and Schedule 7B of the 2017 Act introduce provisions for implementing several Silk Commission recommendations relating to water and sewerage. These include devolving powers over sewerage to the Assembly, introducing an intergovernmental protocol for managing cross-border water issues and removing the Secretary of State's power to intervene in cases where an Assembly Bill or the actions of a public body in Wales have serious adverse impacts on water resources, supply or quality in England.

Legislative competence over water and sewerage undertakers is currently devolved on a 'wholly or mainly' basis. The appointment and regulation of an undertaker is devolved if the undertaker's appointment area lies wholly or mainly in Wales ('Welsh undertaker'), and it is reserved if the undertaker's appointment area lies wholly or mainly in England ('English undertaker').

The Silk Commission recommended aligning the boundary for legislative competence for water with the national border. This would effectively end the regulation of the industry in Wales on a 'wholly and mainly' basis. Provisions for implementing this recommendation are made in section 48(1) of the 2017 Act which are yet to be enacted. The practical implication of enacting section 48 are that Welsh Water's operations in England would be subject to UK Government policy – for example, this would allow all of Welsh Water's non-householder customers in England to switch water suppliers (as introduced under the Water Act 2014), whereas this does not apply to its current customer base in either Wales or England.

## *1.2 Glas Cymru Ownership Model*

Glas Cymru acquired Dwr Cymru Welsh Water in 2001 and is unique in the UK utility industry in that it is:

- a private company with no shareholders (it is not, however, a mutual or co-operative)
- financed in the capital markets, with no government support; and
- all financial surpluses are used for the benefit of its customers.

Welsh Water provides an essential public service to the households, businesses and the environment in Wales. It is a highly capital intensive business, with assets that will serve many future generations. It has a huge capital investment programme, over £6 billion since 2001 with similar amounts to come. Its strategy is to deliver a secure, long-term credit quality to investors (such as pension funds and insurance companies) so as to raise the finance it needs at the cheapest possible cost, thereby keeping down bills to customers (around a third of which go to remunerate finance for investment).

Glas Cymru is a “company limited by guarantee”; it has no shareholders and so its corporate governance functions are the responsibility of its Board, which has a majority of independent non-executive directors, and its Members, around 50 individuals appointed following a process undertaken by an independent membership selection panel. Members are not representatives of outside stakeholder groups but rather are unpaid individuals whose duty is to promote the good running of the company, in the best interests of its customers.

Our governance processes are based on transparency and fairness, underpinning the values of our company purpose. We apply the principles set out in the UK Corporate Governance Code and Ofwat’s Leadership, Transparency and Governance Principles as required by our Licence from Ofwat which was amended in 2019 to include an obligation to comply with these principles. More details on how we meet the provisions of the Code and Ofwat’s Principles and more details on our Governance framework, are contained in the Corporate Governance Report in our latest Annual Report and Accounts.

## *1.3 Regulatory framework*

The water sector is highly regulated and there are strict requirements on water companies across most of their operations. The main regulators are:

### *Welsh Government*

The Welsh Government has devolved authority over most matters pertaining to the regulation of the water industry in Wales.

### *Drinking Water Inspectorate (DWI)*

The Drinking Water Inspectorate is a statutory body with duties and powers to develop and update drinking water quality regulations (which derive from EU legislation), monitor

compliance with such regulations, and implement enforcement action where required. The Chief Inspector is appointed by the Secretary of State and by Welsh Ministers.

*Natural Resources Wales (NRW) and the Environment Agency (EA)*

Natural Resources Wales and the Environment Agency are the environmental regulators for Wales and England respectively, with important roles with respect to the regulation and planning of water companies. They set out water companies' environmental obligations in the National Environment Programme (NEP) in Wales, and the Water Industry National Environment Programme (WINEP) in England.

*Natural England (NE)*

Natural England are the adviser for the natural environment in England (this function is provided by NRW in Wales). Their purpose is to help conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development.

*Consumer Council for Water (CCW)*

The Consumer Council for Water (CCW) is a non-departmental public body of DEFRA and the Welsh Government established under the Water Industry Act 1991 (as amended) to represent the interests of consumers by handling complaints, acquiring and publishing information, providing advice, and investigating matters of interest to consumers. CCW is supported by regional committees established under the Act including a Wales Committee.

*Ofwat*

Ofwat is the economic regulator for the water industry. Its duties include protecting the interests of consumers, ensuring that water companies carry out their statutory functions, and furthering the resilience of water companies. Ofwat has a range of powers, including setting price limits and performance targets through the five-yearly Price Review process.

*Department for environment, food and rural affairs (DEFRA)*

Defra is responsible for improving and protecting the environment and so has a broad remit to play a major role in people's day-to-day life, from the food we eat and the air we breathe, to the water we drink. Defra aims to make our air purer, our water cleaner, our land greener and our food more sustainable. Its mission is 'to restore and enhance the environment for the next generation, leaving it in a better state than we found it'.

Each of the regulators monitor our performance and publish annual reports comparing us with the rest of the sector. If performance fails to meet the standards they expect, they have a range of enforcement options at their disposal, up to and including prosecution.

We submit multiple reports to our regulators. These cover a wide range of topics including annual reporting on finance and capital programme delivery, drinking water compliance, leakage,

wastewater treatment works performance, flow and storm overflow spill event and duration reports, sewer flooding, and customer complaints. We produce 3 yearly biodiversity action plans and are working on the first maps of our biodiversity hotspots that we plan to monitor on a 4 yearly cycle from now on to establish how their conditions are changing. We also produce 5 yearly reports for our Water Resource Management Plan and the newly introduced Drainage and Wastewater Management Plan (both of which look at how we will meet customer and environmental needs 25 years into the future) and our five yearly business plan described earlier.

## **2. Financing Welsh Water**

Running costs (operating costs and the cost of maintaining assets in good condition) are paid for by customers in full every year through their bills.

Investment to improve services, so called enhancement expenditure, is not paid for by customers when it is incurred. Instead, water companies “borrow” the money for enhancement expenditure from investors.

The value of enhancement expenditure is added to the Regulatory Capital Value (RCV) and amortised over 25 years. This amortisation charge is recovered from customers through their bills as is the interest and dividends that companies have to pay their investors for their investments (shares or loans).

The RCV simply represents the amount of money owed to investors. Because of the scale of investment (i.e. enhancement expenditure) water companies are constantly cashflow negative and have to regularly raise money from investors.

### *2.1 Borrowing money*

Between now and 2030, Welsh Water will have to raise £3.5 billion to fund its biggest ever investment programme and to refinance debt which falls for repayment. All water companies will also need to raise record breaking levels of new debt.

The ability to borrow and the interest rate charged on that debt depends on a company’s credit rating. There are 3 credit rating agencies which rate organisations from AAA down to BB. The only organisation that are AAA rated are governments (but not the UK’s or US’s) and some banks.

On average the water companies are BBB rated but Welsh water is A rated; significantly higher than other companies.

The biggest factor in deciding credit ratings is the level of indebtedness i.e. debt as a % of the value of the business, the RCV. This is called gearing. High gearing means lower resilience to financial shocks and more risk that companies will default on their debts.

Welsh Water has the lowest gearing in the industry (59%) and as a result the highest credit ratings in the industry. This means that investors see it as the most financial resilient company; are willing to lend to it and importantly, to lend at the lowest interest rates for water companies.

Welsh Water's interest rates are 0.3% less than Severn Trent and 1.5% less than Thames Water.

Ofwat's latest report on financial resilience ("Monitoring Financial Resilience), published in September 2023, states that they have "no specific concerns with the financial resilience of the company" and that our credit ratings and gearing levels are the best in the sector."

## 2.2 Reserves

A widely held misconception is that "reserves" are cash deposits held by the company as contingency. Whereas reserves are simply the difference between the value of the company and its debt.

As at 30 September 2023, Welsh Water's "reserves" were:

	£m
Regulatory Capital Value (RCV)	7,365
Net debt	(4,375)
Reserves (or regulatory equity)	<hr/> 2,990 <hr/>

"Reserves" are analogous to householders' equity in their homes i.e. the difference between the value of the home and the outstanding mortgage. Like homeowners, companies can borrow more against the value of the company and reduce reserves (or equity), but it has financial consequences – see Borrowing Money below. Reserves simply represent the additional borrowing capacity potentially available to the company.

## 2.3 Dividends

Glas Cymru (Welsh Water's owner) is a company limited by guarantee and does not have shareholders. All other water companies have shareholders and need to pay dividends to their shareholders.

In the decade to 2009/10, any financial surplus was returned to customers in the form of a customer rebate – paid as a reduction on the customer's bills starting at £9 in 2003/4 and raising to £22 in 2009/10. A tighter Price Review determination for 2010-15 limited the amount value that was generated and returned to customers. From 2015, any financial surpluses available was used to accelerate investment to maintain and improve services for customers to provide additional funding for social tariffs for those customers struggling to pay their bills.

In 2022/23 we announced “return of value” of £113 million:

- £13 million company contribution to social tariffs
- £100 million investment to improve river water quality (Phosphates & CSOs)

In total, £570 million has been returned to customers since 2001.

### **3. Permit setting, enforcement and prosecution**

#### *3.1 Historical context*

Whilst Welsh Water is responsible for maintaining the network, ensuring there is sufficient capacity and meeting new legislative and environmental obligation, much of the network and asset base has been developed over many decades – over a century in many cases – and were not designed to meet today’s requirements or expectations.

With over 36,000km of sewers and 27,000km of water mains, over 800 wastewater treatment works, 69 water treatment works, 2,300 storm overflows (SOs), over 2,500 sewerage pumping stations, our asset base is extensive with almost 3,500 environmental permits associated with them.

The network consists of assets that have been built and designed by numerous different agencies, local government, and private developers, to differing standards dependent on when they were built.

Since the introduction of the Public Health Act 1936, sewerage undertakers have only “adopted” sewers which met a published set of requirements. Such standards remain in place today and, since 1981, have been set out within national guidance documents that are commonly referred to as “Sewers for Adoption”. Those standards have allowed the sector to ensure that newly constructed “mains” drainage systems meet set design criteria for their performance.

Those adoption standards have been voluntary since 1937, allowing developers to choose whether to construct drainage systems to the “Sewers for Adoption” standard. Upon meeting those standards of construction, the sewerage undertaker would then take on ownership and future maintenance responsibility from the developer.

Where the developer chose not to meet the “Sewers for Adoption” specification, they could construct the site drainage to a lower construction standard, one which allowed the use of inferior materials, pipes of smaller diameters and shallower depths, amongst others. The compromise for following those lower, cheaper, standards was that maintenance responsibility fell to the owners and occupiers who drained into them, something that many homeowners were not aware of.

In September 2010, governments in England and Wales committed to transferring many of those privately owned drainage assets to water and sewerage companies, a transfer which took place on 1 October 2011. Before that date, we were responsible for 18,400km of sewer. The transfer is believed to have doubled the length of gravity drainage that we’re responsible for. However, because there were no centralised records of private sewers and drains, constructed between 1937

to 2011, we have yet to map all those transferred assets, let alone assess their condition and undertake planned repairs. The costs of proactively mapping transferred assets were assessed but deemed unaffordable by the industry and our regulators. Consequently, we map them when issues are reported.

On 1 October 2016 a further overnight transfer took place of private sewage pumping stations, which had previously been the responsibility of property owners and occupiers. Following an assessment of over 1,100 stations, over 50% were transferred to us and minor works undertaken to make each one “safe and serviceable”. As with the transfer of gravity assets, we’ve not been funded to a level which allows us to rebuild them to meet the latest Welsh Government standards for adoption.

Whilst the private sewer transfer has been a success for all involved, it resulted in assets of a generally poor condition being transferred to us, many of which are expected to have a lower asset life than the sewers we’d voluntarily adopted over the previous 73<sup>1</sup>/<sub>2</sub> years.

In addition to the mandatory transfers outlined above, we’re working proactively with some local authorities and housing associations regarding the voluntary transfer of existing private sewage treatment facilities, which are not currently in our ownership. Because of the voluntary nature of those transfers, those authorities will be expected to undertake some level of upgrade to them, prior to the transfer taking place. Whilst those adoptions will increase our asset base, the risks associated with them at the time of transfer will be significantly lower than with the mandatory transfers of recent years.

### *3.2 Permits*

All of our permits for water discharge activities, our waste operations such as treating sewage sludge (biosolids), or discharges to ground water are issued by the environmental regulators under the Environmental Permitting Regulations (England and Wales) 2016. The regulators set the conditions within the permits that are appropriate to secure the environmental objectives required as well as ensuring standards are met. Permits can also include improvement measures to be met within specified timescales, and any steps needed to be taken during operation of the site. We have almost 3,500 environmental permits all of which are unique to the individual requirements of the sites they are granted for. These permits can include many different requirements and constraints sometimes with many elements for an individual site.

Fig. 1 Example of a permit for Final effluent quality:

14. (a) Subject to paragraph (b) below, the Discharge shall not contain more than:
- (i) 40 milligrammes per litre of biochemical oxygen demand (measured after 5 days at 20°C with nitrification suppressed by the addition of allyl-thiourea);
  - (ii) 21 milligrammes per litre of ammoniacal nitrogen (expressed as N);
  - (iii) 60 milligrammes per litre of suspended solids (measured after drying at 105°C).
- (b) The limit for any of the relevant parameters set out in paragraph (a) above may be exceeded where, in any series of samples of the Discharge taken at regular but randomised intervals in any period of twelve consecutive months as listed in Column 1 of the table at Annex 1 to this consent, no more than the relevant number of samples, as listed in Column 2 of the said table, exceed the applicable limit for that relevant parameter.

Fig. 2 Example of a permit for Storm overflow and overflow setting requirements:

2.3.2 For the discharges specified in table S3.3:

- (a) The discharge shall only occur when and only for as long as the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt.
- (b) Off-line storm storage must be fully utilised before a discharge occurs. It shall only fill when the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt and shall be emptied and its contents returned to the continuation flow as soon as reasonably practicable. The minimum off-line storm storage required is specified in table S3.3.
- (c) On-line storm storage must be fully utilised before a discharge occurs. It shall only fill with the excess flows due to rainfall and/or snow melt. The storage shall be emptied and its contents returned to the continuation flow as soon as reasonably practicable. The minimum on-line storm storage required is specified in table S3.3.

Table S3.3 Storm sewage discharge settings						
Effluent(s) and discharge point(s)	Description of discharge	Overflow setting l/s	Maximum size of solid matter	Screen aperture size	Minimum screen capacity flow l/s	Minimum storage capacity m3 (off-line)
A2 Settled storm sewage via Settled Storm Discharge Point	Settled storm sewage	48.1	No greater than 6 mm in more than 1 dimension	6 mm x 6 mm	The screen shall be designed to cope with all flows up to and including the 1 in 5 year storm return period, as a minimum	633

Permits can also change over time in line with changing environmental policies or changing environmental conditions local to the site.

The conditions within our permits are set to ensure compliance with legislation, are appropriate to protect the standards require in the receiving environment and adhere to any national policies.

Variations to existing permits can be requested by DCWW as the operator, or by the NRW/EA as either part of the WI(NEP) process, or as necessary to ensure the permit is protective of the receiving environment, where new information is available on the best available techniques or for other issues



as necessary. For water industry discharges, permits cannot be reviewed within a 4 year period of a variation unless in agreement with the operator. New permit applications, which are few and far between would be if a new requirement is identified, e.g. a new build WwTW.

The process followed is complex, but in simple terms, where DCWW require a new permit or a variation, we would where necessary submit a pre-application to seek advice on the information that is needed for the permit application. Then, a formal application which would be submitted for determination. For those permit changes initiated by the regulator, there would either be a request for information if it were a review of permit, or we would agree a method of submission with the regulator for information for WI(NEP) driven changes. After a determination period, a draft permit is issued for 'operator review'. This gives DCWW chance to check changes are in line with what was requested in a variation application or as per the WI(NEP). Permits are then formally issued.

Permits can be appealed within a specified timescale after issue for a number of reasons including a disagreement on the conditions imposed by the regulator where the regulator varies the permit or if an application is refused. Appeals go to Welsh ministers (or Secretary of State in England).

There is a fee for permit applications under a charging scheme which reflects the effort the regulator has to put into determining the application, the environmental impact or risk and the extent of public participation required. In AMP8, we anticipate fees for applications to vary permit conditions as a requirement of our National Environment Programme will between £6million and £7million. There are then subsistence charges to support ongoing costs for checking monitoring data and assessing compliance. This is set by an annual schedule of charges, depending upon the permit type and the quality of the discharge conditions. Our current subsistence charges for all our WwTW and WTW discharges amounts to over £5million per annum.

The committee should also be aware that NRW have recently (26th October last) published new technical guidance for permitting storm overflows. We are reviewing the detailed requirements of the new guidance but it will be sometime before we understand the new requirements fully and their potential impact on the programme and cost of improving our storm overflows.

We continue to work with NRW to to review permits and amend and agree new permits where necessary. As a result of such reviews, we currently have 147 unpermitted storm overflows which we are in the permit process with NRW, which we believe were built pre-privatisation. We also surrendered over 150 permits where we identified that the asset was no longer in use or it was a duplicate for an existing asset. We agreed in 2016 with our regulators that we would use the process of installing Event and Duration Monitors (EDM) as a reason to survey the asset and identify any permit anomalies. This process has been underway between 2016 and now.

### *3.3 Enforcement and Prosecution*

NRW has a wide range of available enforcement options to address environmental offences which include providing advice and guidance, issuing notices requiring improvements and a return to compliance or prosecution. If considering prosecution, NRW must decide whether it is an

appropriate response or whether an alternative may be more appropriate. NRW have publicly stated that their preference is to agree improvement prior to prosecution due to financial penalties incurred by the Courts being paid to the Treasury, therefore stripping the company of much needed finance that could otherwise be invested in improving infrastructure. As a company without shareholders, there is no alternative source of income to cover such costs.

NRW regularly investigate actual or suspected non-compliance and issue warnings and improvement notices to Welsh Water. In addition, since 2018, Natural Resources Wales has successfully prosecuted Welsh Water three times; it has accepted one Environmental Undertaking made by Welsh Water; and Welsh Water has accepted 9 cautions offered by NRW.

Generally, enforcement and prosecution action against Welsh Water is pursued under the Environmental Permitting Regulations (England and Wales) 2016, and occasionally under the Salmon and Freshwater Fisheries Act 1975. In England the Environment Agency can accept an Enforcement Undertaking (a commitment to address the conduct causing the breach; rectify the consequences of any breach or restoring the position, e.g., funding an environmental eNGO to improve the environment as a way of “offsetting” the harm caused by the incident; or an offer of reparations to those impacted by the incident) for offences under the Environmental Permitting Regulations. However, it is not currently an option in Wales open to NRW, such that in reality there is little opportunity for Welsh Water to offer Environmental Undertakings other than for offences under the Salmon and Freshwater Fisheries Act 1975. This leaves NRW with only prosecution as a last resort, over and above a warning letter or caution, with all fines going to the UK Treasury as opposed to being used on environmental betterment in Wales.

#### **4. Storm overflows (SOs) and environmental impact**

Over 60% of our sewer network is a combined sewerage system, meaning that both rainwater and wastewater (from toilets, bathrooms and kitchens) are carried in the same pipes to a sewage treatment works.

When our sewer system is operating normally, combined sewers collect rain water that runs off gutters, drains and roads, as well as sewage. We call this wastewater, which then gets taken to our wastewater treatment works, where it is cleaned, treated and returned safely to the environment to rivers or the sea. Before the early 2000s, there was no coastal sewage treatment in the UK. Significant investment since privatisation has gone into building these coastal wastewater treatment works and improving discharges at our coasts and this has led to Wales having a quarter of the UK’s Blue Flag beaches with only 15% of the coastline.

Most of the wastewater network was built over 100 years ago during the Victorian times, if we were designing a system now, we would do it very differently and have separate pipes for sewerage and rainwater. This is how new housing developments are designed.

During heavy rain storms, more water enters the pipes of these older ‘combined’ systems than they are designed to cope with, so they have been designed to safely relieve the pressure through release

points - known as Storm Overflows or SOs. SOs release the flows – which is around 95% surface water - into a river or the sea. Without these release points, the sewerage system would back up, and cause sewage flooding to streets, highways and cause toilets to overflow inside properties.

It is important to point out that SOs are designed to operate during heavy rain, so that if they release wastewater then any sewage present is heavily diluted with rain and surface water into waterbodies which should also be in flood.

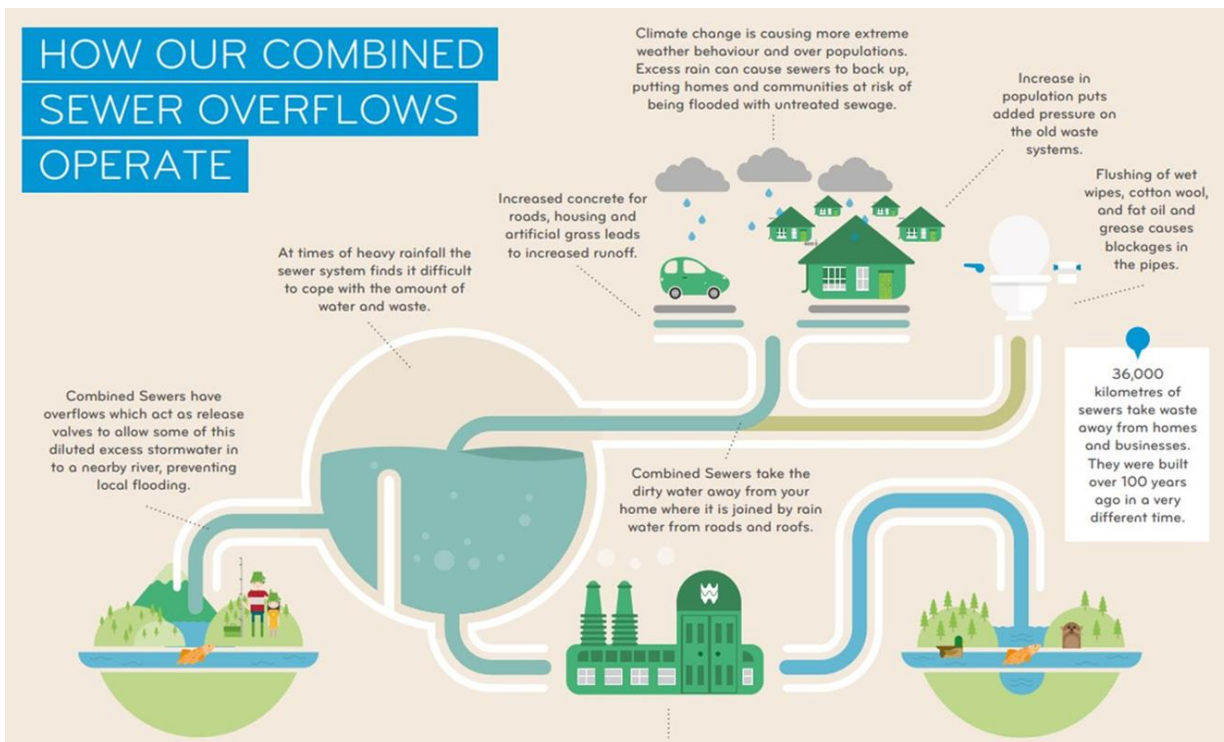


Fig.3

As illustrated above (fig. 3), SOs discharge when the volume of combined surface water and sewerage is greater than that can be treated or stored in storm tanks.

#### 4.1 Storm overflow monitoring

Like most of the UK, our drainage and sewerage infrastructure dates back to the Victorian era, and was designed both to manage surface water runoff from rainfall and sewage from rapidly growing populations. Responsibility for different parts of the system has evolved and divided, such that responsibility for wastewater and the sewerage network falls under water companies, while highway drainage and surface water management is managed separately. However, fundamentally the systems are overlapping, with rainfall and surface water runoff having a major impact on the management of sewerage and wastewater.

Given the combined nature of the system, it was designed with storm overflows (SOs) to ensure that the limited capacity in the network is not overwhelmed during and following heavy rainfall, to mitigate the risk of flooding from the system into homes and external areas.

Normally SOs release highly diluted sewage and rainfall at times when the flows in rivers and streams are high and the impact on the environment should therefore normally be low. Following heavy rainfall flow levels in our network increase 20 fold or more, and some catchments take many days to drain down through the infrastructure. Because of the levels and intensity of rainfall experienced in Wales, and our topography, we rely on SOs to protect our customers from flooding more than is the case in many other water company areas.

We have significantly more SOs per customer than other water companies, particularly those in eastern parts of England. We also have the highest standard average annual rainfall (SAAR) of all the English and Welsh water and sewerage companies.

The combined effects of climate change, population growth and urban creep are having the effect of increasing the frequency and volume of discharges from storm overflows, which in some cases is having a detrimental impact on overall river health. For many years the operation of the some 2,300 SOs in our area was not well understood.

This was because the focus of legislation (principally UWWTD) and our regulators was ensuring that the appropriate capacity was in place to treat minimum flows at treatment works, that the ecological status of rivers, shellfish waters and bathing waters was being improved as required, and that wastewater was being treated to minimum levels of quality before being discharged back to the environment. The regulations recognise the need for SOs to protect customers and communities from sewage flooding that would otherwise occur in the absence of such relief points in combined sewerage systems. SOs can be classified as satisfactory, substandard or unsatisfactory, taking into account a range of factors set out in guidance from NRW.

We have rolled out monitoring of SOs (Event and Duration Monitors - EDMs) over the last 10 years and over 99% of our SOs now have spill event duration monitors (EDM) installed. EDM data allows us to report to the regulator on the frequency and duration of the operation of these assets. This is particularly important for SOs discharging into shellfish and bathing waters where there is often a legal limit on average spill frequency.

All of our EDM data is available on our website. Early next year we will provide near real time information (within one hour) on our website showing SOs that are operating - for bathing waters and high amenity sites initially.

Storm overflow monitoring provides information on the frequency and duration of storm overflow operation (known as Event Duration Monitoring or EDM). We have installed monitoring on almost all assets that we know act as storm overflows including those that have recently been identified without permits or where they are permitted incorrectly. We report the results of our monitoring annually to NRW and the EA and we have published the data annually on our website since 2016 as the monitoring was rolled out. Before 2016 there was limited coverage of these in terms of frequency of operation although the monitoring that NRW and EA have been adopting within rivers, would pick up impacts from all assets discharging, however given the intermittent operation of these assets, it

had been more difficult to identify if any of these assets were causing harm, as opposed to the continuous discharges of treated effluent from wastewater treatment works.

EDM monitoring is important for helping us understand the performance of our networks but frequency and duration are not a good indicator of the ecological impact of a storm overflows in isolation from other factors such as dilution of the spill in the receiving water course. In 2018 we agreed a new methodology for assessing the ecological impact of storm overflows using the Storm Overflow Assessment Framework (SOAF) which we classify as ranging from “Severe” to “No / Very Low”. Using a combination of water quality modelling, invertebrate sampling and aesthetic surveys it sets out a way of estimating the impact of a storm overflow currently and provides the means of determining improvement needed to eliminate its impact.

Our investment programme will ensure that by 2040 we will have reduced the impact of all our storm overflows to “no / very low”. An additional environmentally precautionary step we are adopting is that the design of the improvement will be based on upstream water quality meeting *good* or *excellent* ecological status under the Water Framework Regulations. This means that even if water quality upstream is currently below this standard for any reason, the improved storm overflow will still support *good* or *excellent* ecological status in the water body if those other causes are resolved in future.

The first stage of this programme, assessing the impact of our storm overflows, is underway in the current investment programme with around 800 storm overflows scheduled for investigation. The remaining assessments will be completed in the next investment programme. The results of the first 253 assessments on frequently spilling storm overflows confirms our view that spill frequency on its own is a poor indicator of impact – see table 1 below:

<b>Impact</b>	<b>Sites</b>	<b>Average Spills</b>	<b>Average Duration</b>
<b>Severe +</b>	77	83.1	777.6
<b>High/Very High</b>	42	96.7	865.1
<b>Moderate</b>	51	74.3	577.4
<b>Low</b>	23	94.3	835.5
<b>No / Very low</b>	60	83.6	700.3
<b>Total</b>	253	86.4	751.2

Table 1

The order in which storm overflows are improved will be based on their ecological impact and the environmental sensitivity receiving water body. Storm overflows with the greatest impact discharging to the most sensitive areas scheduled for investment as early in the programme as possible and those with a lower impact will be improved in successive AMP periods.

Just as Welsh Water was a leader in installing EDM monitors, we are now leading the industry in carrying out these environmental impact assessments (SOAF).

The highest priority waters will be those locations where the water body is designated under the Habitats regulations or similar protect location, within 1km of a bathing or shellfish water or the if they are the reason for a water body not achieving good ecological status.

It is important to note that EDM monitors do not measure the volume of the discharge or the environmental impact on the water body. Whilst there's been significant media focus on spill numbers – such as the Top of the Poops website – they do not indicate the environmental impact on the water body, neither are they all considered to be pollution incidents and the vast majority of which occur within the permit conditions agreed with the regulator and have minimal impact due to the highly diluted nature of the discharge into a water body that is also carrying more flow due to the rainfall. The biggest reason for spills on dry days are when blockages occur, primarily due to wet wipes blocking the sewer. These would be classified as pollution incidents and, if we detect these using our EDM monitoring, we self-report to NRW or EA and response as quickly as possible.

The Welsh Government-commissioned report from Stantec, published last week, outlines the options for tackling storm overflows in Wales and the associated cost. The report confirms that all options would cost many billions on pounds, but that the preferred option in Wales of tackling those SOs causing environmental harm as opposed to just operating more frequently, is more affordable. However, all options will require bill increases and will take decades to deliver.

#### *4.2 Source Apportionment*

Welsh Water has led on the Source Apportionment Graphical Information System (SAGIS) modelling for sensitive river catchments in Wales, allowing us to build a virtual representation of the river bodies and better understand the impact of our assets on SAC rivers, with all results shared openly. The SAGIS models – that are audited by NRW - also allow us to identify other sources of pollution and test proposed improvements in our discharges to establish their impact on water quality in the river. This has helped us and NRW to identify where our investment can most effectively be directed to have the biggest impact.

By way of example, the results show that rural land use is contributing 84% of the phosphorous load for the Eastern Cleddau and 65% for the Western Cleddau. Our wastewater treatment works are contributing 11% and 22% respectively. SOs are contributing relatively little to the phosphorus loads: 2% and 5% respectively. On the Wye the modelling suggests that our WWTWs contribute 23% of the phosphorous in the SAC waterbody, with SOs accounting for 2% (see Fig. 4 below).

As a result of this work, we agreed with NRW and the Taskforce that we will commit to reducing phosphorous discharges from our WWTWs to SAC rivers by 2032 down to the levels needed to fully comply with our 'fair share' of the overall required reduction, subject to Ofwat approval of the required funding. This will involve tighter phosphorus limits at 159 of our 233 wastewater treatment plants on the five failing SAC rivers, and the removal of 98.3 kg of phosphorus per day from works discharges. 10 The Welsh Government has committed to the establishment of Nutrient Management Boards (NMBs) in each SAC catchment to find the optimal means to achieve the overall targets for nutrients. We are participating fully in this effort.

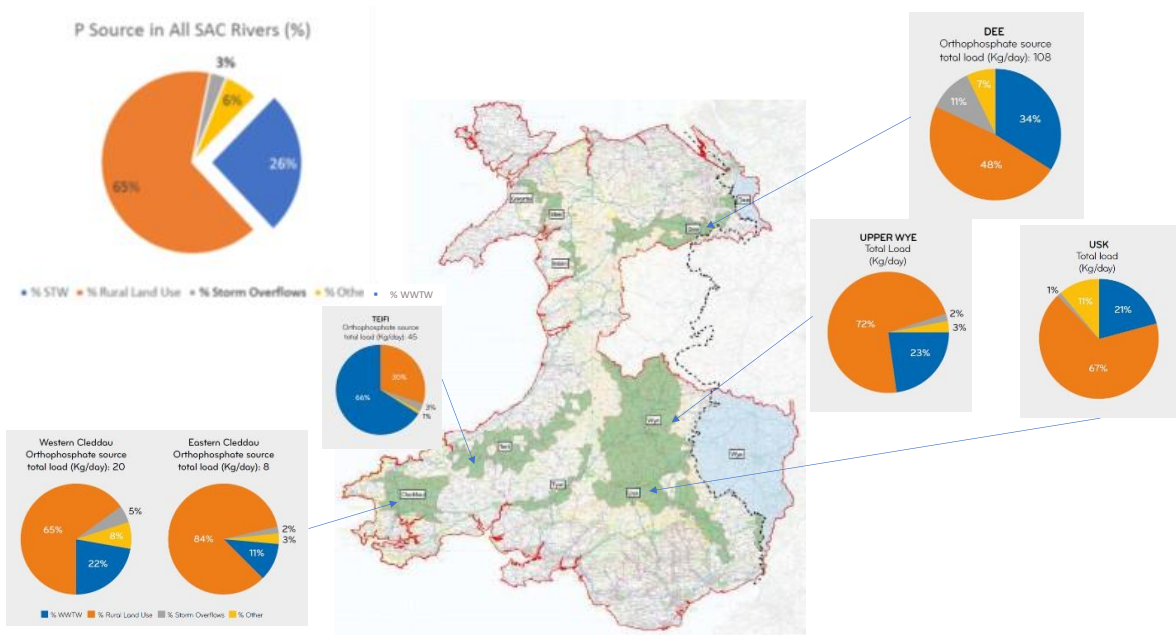


Fig. 4

We have agreed to work collaboratively with NRW and other partners on a project to bring a number of interventions together to improve the Teifi. This river has approximately 70% of the phosphorous load coming from wastewater and we are investing in a number of treatments to get river into compliance. However, we are not only doing improvement works at our works, we plan to work on land management improvements including reducing fertilizer user and developing wetlands to take out more of the phosphorous.

The Welsh Government has committed to the establishment of Nutrient Management Boards (NMBs) in each SAC catchment to find the optimal means to achieve the overall targets for nutrients. We are participating fully in this effort.

It is important to note the above approach will not only apply to SAC rivers, but to other (mostly smaller) rivers where there are also challenges around nutrient levels. These are not being ignored but the SAC rivers have been identified as the highest priority for action in the short to medium term.

#### 4.3 How river water and bathing water quality in Wales compares to other countries

The environmental quality of rivers and bathing waters in Wales are relatively high, with 40% of waterbodies in Wales meeting 'good' Water Framework Directive (WFD) ecological status, compared to 16% of waterbodies in England.

Scotland's Water Framework Directive river water quality data show that 67% of Scottish water bodies are achieving good ecological status. This reflects we believe the large area of Scotland which is of low population density and so anthropogenic impacts causing non-compliance are low.

In terms of river water quality, the State of Natural Resources Report (SoNaRR) 2020 confirms that 44% of rivers in Wales are achieving good ecological status under the [Water Framework Directive 2018 interim classification](#) (see Fig 5 below). We expect to see the next SoNaRR report published in 2025. A range of pressures are compromising the health of our freshwater ecosystems, including climate change; agricultural diffuse, mining legacy, sewage and other pollution; physical river modification; abstraction and invasive non-native species. Fig. 6 provides an international comparison of the ecological status of waterbodies.

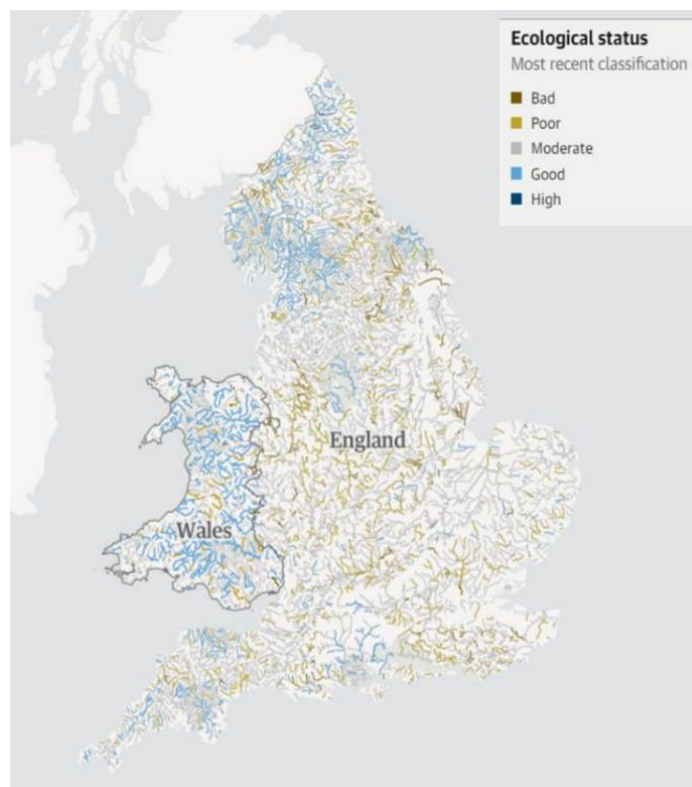


Fig 5: Created and published by The Guardian, on 12 September 2023



Ecological status of surface water bodies  
Second River Basin Management Plan

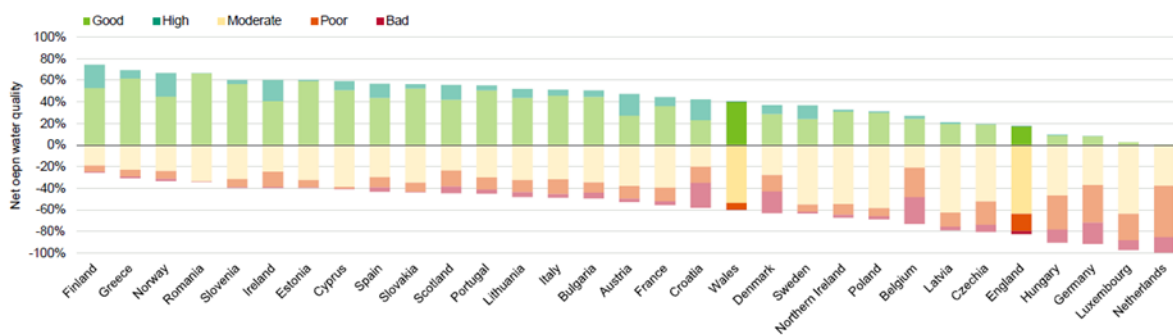


Fig 6: International comparison of ecological status of water bodies

As you can see from Fig 6, Wales has a very low number of “poor” waterbodies but a large number classified as “moderate” with a whole range of “Reasons for Not Achieving Good” status.

*Bathing water quality*

Coastal waters in Wales are overwhelmingly of high-quality. This is essential to the tourism sector in particular, as well as contributing to wider societal goals such as health and wellbeing.

There are 107 designated Bathing Waters around the coast of Wales, include two new designations in southern areas. In 2022 79% of the 107 designated bathing waters were classed as Excellent. The position is relatively stable and only one designated Bathing Water failed to reach the regulatory standard in 2022 (with the failure attributed primarily to an asset not owned by Welsh Water) and none in recent preceding years.

Bathing water classification for 2022	Wales	England
Bathing water assessed	107	419
Excellent	85 (79.4%)	302 (72.1%)
Good	16 (15.0%)	87 (20.8%)
Sufficient	4 (3.7%)	18 (4.3%)
Poor	1 (0.9%)	12 (2.9%)

Table 2

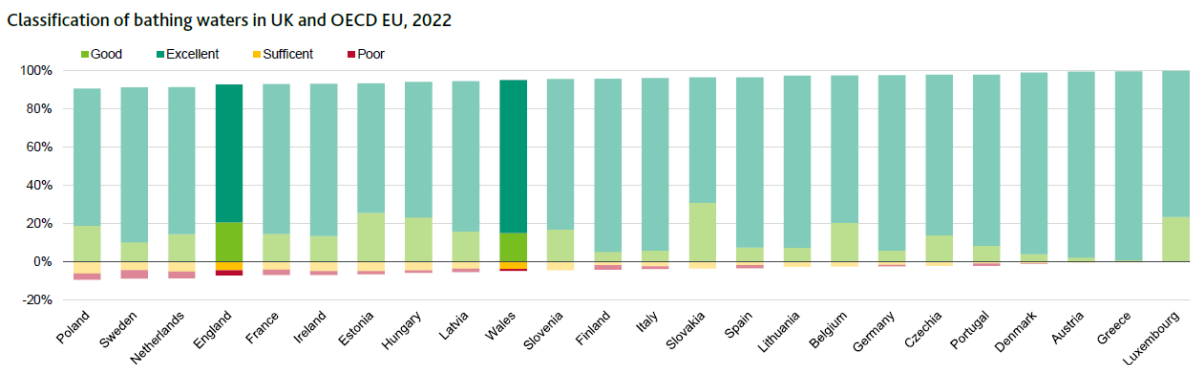
With 2,700 kilometres of coastline - approximately 15% of the total for the United Kingdom – Wales has a quarter of the Blue Flag beaches.

This strong position is largely attributable to investments in wastewater treatment works and networks in coastal areas in previous AMP periods, particularly from 1995 to 2010. Improvements to protect bathing waters focus on measures to reduce concentrations of e. coli and intestinal enterococci in discharges reaching the designated bathing water area.

The WFD also requires specification of protected areas designated for the protection of economically significant shellfish species, and there are a number of designated Shellfish Water Protected Areas in Wales. There has already been significant investment in investigations and improvements including in the Loughor estuary, with extensive modelling in AMP6 to understand the remaining sources of faecal bacteria preventing shellfish from meeting at least Class B. Based on this evidence we are investing to protect the Menai Straits shellfish waters in AMP7 and 8. Other improvements and investigations are planned for other shellfish waters.

We are therefore in a strong position on the quality of coastal and bathing waters in Wales, but we are not complacent. There are bathing and shellfish waters that are at risk of deterioration from wider trends such as impermeable area creep and climate change, on which we are working closely with NRW. The main example of this in AMP8 is Jackson's Bay near Barry which we have found to be affected by the growth in the local sewerage catchments. We plan to reduce the impact of our assets on the Barry bathing waters through implementing our sustainable £100 million RainScape programme as we did in Llanelli between 2010 and 2015 and also between 2015 and 2020.

We want to support the Welsh Government's aspiration to move towards designation of some inland water bodies as bathing waters, an aspiration which is shared with the Wales Environment Link and a number of other stakeholder organisations.



Source: European Environment Agency, Defra, Welsh Government, Moody's Investors Service

Fig 7: International comparison of bathing water classifications

## **5. Better River Quality Taskforce (BRQTF) and proposed approach to reduce environmental harm from storm overflows**

Welsh Government is leading a multi stakeholder Better River Quality Taskforce (BRQTF). This was established to “to evaluate the current approach to the management and regulation of overflows in Wales, to set out detailed plans to drive rapid change and improvement” and the development of a “Storm Overflow Action Plan”. The task force includes representatives from WG, Ofwat, Afonydd Cymru, the Consumer Council for Water, DCWW and Hafren Dyfrdwy. The goals of the task force are:

- Supporting the Welsh Government to achieve their environment and climate change ambitions,
- Reducing the adverse impact of any overflow discharges on the environment by targeting investment and taking regulatory action where required to deliver improvements.
- Working within the existing regulatory framework to ensure water and wastewater companies effectively manage and operate their network of sewers. Regulators will use their existing powers to drive the right outcomes and hold companies to account.
- Gathering greater evidence of the impact on our rivers through improved monitoring of both the discharge and the receiving water and through this drive towards truly smart networks making best use of technology and real time control.
- Working with the public to tackle sewer misuse.
- Working with the public and stakeholders to improve the understanding and role of overflows in Wales.

Tackling SOs is seen as only one of several elements that need to be addressed if we are to improve river quality in Wales. The BRQTF also recognise SO’s role in protecting customers and businesses from flooding and historic investment by water companies to reduce impact and improve monitoring and understanding.

Based on the direction from the BRQTF and PR24 Forum Strategic Steer, the approach in Wales differs from England where the focus is on reducing the frequency of spills from SOs. Here the target is to eliminate ecological harm and prevent adverse ecological impact of any SO.

The overall goal endorsed by the Taskforce is to maximise the reductions in ecological harm caused by SO spills. This is reflected also in the Strategic Steers from the Welsh Government and the PR24 Forum (see below). While this will also produce a reduction in the number of spills, this is not the principal objective. Achieving satisfactory status for all our SOs as defined by NRW is the ultimate objective for 2050. Owing to our well advanced SOAF programme we are in a position to target reducing ecological harm as the principal objective and tackle the highest priority SOs on this basis.

This approach has been endorsed by the independent report by Stantec which evaluated a range of options to tackle SO’s and evaluated the costs, the bill impacts on customers and evaluated the carbon impacts and a estimated a cost benefit. The approach planned in Wales delivers

environmental improvement at a lower cost on society than the currently proposed English approach.

There are significant differences in the legislative and regulatory context between England and Wales. In England SO spill frequency has been adopted as a surrogate for impact. Defra's

Storm Overflows Discharge Reduction Plan, published in August 2022, introduced long term spill frequency targets for water companies in England. The headline targets in England are:

- By 2035, English water companies will have: improved all overflows discharging into or near every designated bathing water; and improved 75% of overflows discharging to high priority sites.
- By 2050, no storm overflows will be permitted to operate outside of unusually heavy rainfall or to cause any adverse ecological harm. This means that storm overflows will not be permitted to discharge above an average of 10 rainfall events per year (or less if impact is modelled to occur at that frequency).

The common industry Performance Commitment on SOs prescribed by Ofwat as part of its PR24 methodology is aligned with this approach in England. If our investment plan were developed and incentivised on the basis of targeting the SO spills measure, we would tackle first those SOs that are spilling most frequently but not necessarily causing significant harm (perhaps because of the nature and topography of the catchment, the size of the SO pipe, and the flows in the river). This would clearly not maximise the improvements to the environmental benefits in terms of minimising impact.

The common industry PC also suffers from the problem that the 'performance' is likely to vary by year to year considerably with variations in rainfall patterns, which are likely to dwarf any improvements resulting from our investment plan, at least in the short-term. It would show year on year that those wetter parts of the UK have higher spills yet does not correlate with river water quality which is the outcome we are all seeking.

Therefore, we are following the approach agreed with the Taskforce and the PR24 Forum. Ofwat's proposed SO spills measure is not aligned with this approach, so we are proposing a 'bespoke' Performance Commitment which is aligned with the PR24 Forum Strategic Steers and Welsh Government policy, as the basis of our long-term plan on SOs.

As part of the process of developing our business plan for 2025-30 (PR24) we informed Ofwat that our SO performance measure would be targeting the reduction of environmental harm as opposed to spill numbers, in line with the steer from the PR24 and we have put forward the measure in the business plan submitted to Ofwat on 2<sup>nd</sup> October.

#### *PR24 Forum Strategic Steers: Storm Overflows*

- We expect DCWW to reduce the use of Storm Overflows (SOs) prioritised on the basis of delivering the maximum improvement to the environment in terms of reducing harm. This also applies to currently unpermitted SOs.

- We expect DCWW to work together with NRW to implement an approach to permitting all SOs by 2030 with completed ecological assessments and a plan for reducing ecological harm in line with the wider investment approach.
- Reductions in the numbers of spills are welcome but are not in themselves the priority for action, which should be focused on identifying and addressing SOs causing the greatest impact on the environment.
- We recognise the significant investment estimated to be required to address the problem of SOs causing ecological harm and recognise the need to take a phased approach in order to manage the impact on customer bills, financing and deliverability.
- We expect all DCWW assets to be classified against criteria set out in NRW's Storm Overflow classification guidance by 2030.
- We expect DCWW to invest to increase the proportion of SOs causing no harm (or 'very low' harm) to the environment to 100% by 2040 at the latest including all currently unpermitted SOs. We expect the company to achieve 60% by 2030, and 80% by 2035.
- We expect DCWW to work with local authorities to maximise opportunities from the flood risk management programme where projects can directly or indirectly support the SO programme. We expect the company to be an exemplar on surface water management in Wales.

### *5.1 Phosphate reduction investment*

Phosphorus is an element essential for plant growth and it is in lots of the food we eat and is a key part of fertiliser. When too much reaches the river, along with other nutrients, it can cause algal growth and eutrophication which is harmful to the ecology of the river. There are many sources of phosphorous entering rivers, of which our wastewater treatment works and SOs are just two, with agriculture being another major contributor. Phosphorous is also naturally occurring and is released slowly from natural sources.

Phosphorous levels in many of Wales's rivers are too high, seriously damaging their ecological health. This is a particular problem for Special Areas of Conservation (SAC) rivers, of which there are nine in Wales - Cleddau, Eden, Gwyrfai, Teifi, Tywi, Glaslyn, Dee, Usk and Wye. These rivers are particularly valuable in terms of their biodiversity, including special species such as Atlantic salmon and freshwater pearl mussels.

In 2021 the Joint Nature Conservation Committee (JNCC) recommended that tighter phosphate targets be adopted after reviewing new evidence about the impact of phosphates and the effects of climate change on the ecology of rivers. A subsequent evidence review by NRW showed that 60% of SAC river waterbodies were failing against the new targets.

Phosphate constraints are also impacting economic and community development, with planning rules blocking house building in a number of catchments due to the impact on phosphates. Solving this problem is a major priority for the Welsh Government, which has a target to build 20,000 new low carbon homes to address the housing shortage.

In AMP7 (2020-25), we are investing an additional £100 million from our 'not for profit' dividend to accelerate investment in phosphorous reduction at treatment works in SAC areas. Planned investment is outlined below::

*AMP7*

- Norton
- Presteigne
- Weobley
- Eign
- Rotherwas
- Leominster
- Builth Well
- Kingstone and Madeley
- Pontrilas
- Llandrindod
- Rhayader
- East Bovilston
- Clyro
- Crosshands
- Eglwysbach
- Llanarth
- Pontyberem
- St Nicholas
- Tattenhall
- Whitchurch
- No Man's Heath
- Malpas
- Farndon

*AMP8 (Early Delivery)*

- Llanfoist
- Lampeter
- Letterston
- Llanybydder
- Monmouth
- Corwen
- Spittal
- Llandrindod (tighter limit)
- Brecon
- Wolfscastle
- Five Fords

Our plan for phosphorous reduction should be understood as part of the multi-stakeholder effort to tackle this issue, and also in the context of the NEP and the regulatory landscape in Wales.

We have agreed with NRW and the Better River Water Quality Taskforce that we will commit to reducing phosphorous discharges from our wastewater treatment works to SAC rivers by 2032 (with 90% completed by 2030) down to the levels needed to fully comply with our 'fair share' of the overall required reduction, subject to Ofwat approval of the required funding. This will involve tighter phosphorus limits at 159 of our 233 wastewater treatment plants on the five failing SAC rivers, and the removal of 98.3 kg of phosphorus per day from works discharges,

### *5.2 Storm Overflow Investment*

DCWW has invested in storm overflow improvements over multiple 5 yearly investment or Asset Management Plan (AMP) periods since privatisation in 1989. There were significant investment programmes at selected storm overflows between AMP2 and 4 (1995 to 2010). These programmes of work were funded through the NEP to meet to ensure we met the requirements of the Urban Wastewater Treatment Regulations or to meet bathing and shellfish water quality obligations. We also invested a further £115m in the Loughor Estuary in AMP5 and 6 (2010 to 2020) to improve water quality in the area and undertook one of the largest programmes of retrofitting sustainable drainage in the UK as well as introducing novel technology to increase our treatment capacity in the area. More recently investment in Storm Overflows has introduced EDM monitoring and further improvements in bathing and shellfish waters usually in response to our investigations showing that our assets could pose a risk to compliance.

In this investment period, AMP7, we developed and agreed an industry leading program with NRW under the SOAF to investigate the impact of over 800 frequently spilling CSOs throughout AMP7. We are also delivering a small prioritised investment programme on those sites where the cost benefit of reducing the environmental impact of the SO met the criteria set out in the framework. This programme was extended from the original programme agreed in 2019 thanks to the additional investment made available by the board in 2022.

In AMP8 our investment programme will be based on the results of our impact assessments and, subject to approval by Ofwat, will be significantly larger than in AMP7. We plan to eliminate the ecological impact of around 186 sites and this will be the start of a much longer investment programme to reduce the impact of all our storm overflows. A significant difference between AMP7 and 8 is that we will no longer use out a cost benefit assessment to determine if investment should take place.

Our plans are based on our discussions with, and direction received from, the Better River Quality Task Force and PR24 Forum. The Forum has confirmed that our programme should be monitored and incentivised on reducing ecological harm and not spill frequency. We have agreed programme outcomes that will see 60% of our storm overflows having “no” of “very low” impact by 2030, 80% by 2035 and 100% by 2040.

Whilst we are undertaking these enhancements we have also made a significant allowance for storm overflow maintenance to ensure that they meet their permit requirements . Maintenance investment is taken from DCWW's base maintenance allowance and not from the NEP or enhancement programmes. The key areas for maintenance investment in AMP 8 include

- Approximately £31m to restore performance at SO's that have previously been improved to limit the average number of annual discharges (usually near bathing or shellfish waters) but which have breached their agreed trigger points.
- Strategic investigations in the Afan catchment have identified c£41m to be invested on a number of SOs based on a detailed study.
- Approximately £70m in maintenance investment to restore flow pass forward at WWTWs and ensure storm tanks do not operate sooner than they should.
- Separately we will be undertaking maintenance investment on our pumping stations and sewer networks to ensure we deliver our pollution, flooding and compliance performance.

We have previously estimated that to get all our storm overflows down to only operating in exceptional rainfall would cost around £9-14bn. The Welsh Government commissioned report by Stantec released last week estimated the cost at around £11bn. Clearly with only around 1.4million household customers, this level of investment would either have to take many, many years or risk being unaffordable to customers. This is why the approach to tackle SOs causing harm and targeting getting our rivers to good ecological status is a more sensible option, especially in a country where it rains so much more. The Stantec report estimates this to cost around £3bn which aligns with our plan and target out to 2040.

### *5.3 Using nature-based solutions*

We have used a number of nature-based solutions to reduce the frequency and impact of CSO discharges. These include the development of wetlands and also sustainable urban drainage schemes such as RainScape in Llanelli and Green Grangetown in Cardiff. We are committed to using more nature based solutions in future investment periods.

#### *RainScape Llanelli*

We invested £115 million across Llanelli and Gowerton in our innovative RainScape work between 2012 and 2020.

RainScape is Welsh Water's approach to managing surface water and reducing sewer flooding by separating rain water from the existing system, slowing down the rate it enters the network and by redirecting it to local rivers and watercourses, and in some cases, removing it completely. It helps reduce sewer flooding and pollution and creates greener, cleaner communities for us to live in.

Our RainScape work was particularly needed in Llanelli as the area sees almost as much storm water in its network as Swansea, despite the fact that Swansea serves three times the number of properties, and three times the area compared with Llanelli.



With the help of contractor partners, Morgan Sindall, we have completed 36 RainScape projects in the Llanelli area since the project was launched in 2012. This has involved laying around 14 miles of new pipework and kerb drainage, tunnelling just under one mile underground to create rainwater sewers and planting almost 10,000 plants and trees in swales, planters and basins.

RainScape catches rainwater and slows down the speed at which it goes into our sewer network using a range of interventions:

- Basins and Planters

Shallow basins, often filled with plants, catch and clean the water that runs from roofs and road before soaking into the ground or slowly making its way into our sewers.

- Swales

Long, shallow channels, often filled with plants and trees, catches, slows down and cleans rainwater before soaking into the ground or slowly making its way into our sewers.

- Porous paving

Paving with lots of tiny holes which allow water to pass through and soak into the ground, rather than running straight into our sewers.

- Grass channels

Long strips of grass that can be put on streets to help absorb rainwater.

- Underground storage

Underground storage boxes which catch water during heavy rainfall before either soaking into the ground or slowly running it into our sewers.

RainScape schemes are the most sustainable ways to reduce SO “spills” but they require partnerships with local authorities and landowners if they are to be delivered at scale.

### *Wetlands*

Constructed wetlands are engineered to mimic the physical, chemical, and biological processes occurring in natural wetlands. Wetlands work by taking partially treated wastewater and passing it through a series of interconnected ponds. All the ponds are planted with native aquatic species such as iris, rush, marsh marigold and watercress.

The wetlands naturally remove ammonia, nitrogen and phosphate. Wetlands are a much needed solution for some of our smaller wastewater treatment works where conventional solutions may not be possible, or may be too expensive or too carbon-intensive infrastructure. Wetlands also create fabulous rich habitats for local wildlife.

As well as providing water treatment benefits, wetlands are a rich and valuable habitat for biodiversity. Depending on the site of the wetlands and the land footprint required, they are often a

lower cost solution compared to conventional engineered approach, and don't require external chemicals and most of the time require zero energy demand.

Although a wetlands will not always be suitable, where they can confidently provide the water quality needs, we commit to working with wetlands and other nature based solutions, for the benefit of our rivers and biodiversity.

As part of our wetlands programme, 7 wastewater treatment works are progressing through feasibility studies, to understand if they would support a wetland solution to the water quality parameters required at site. A partnership wetlands framework is being advanced to enable Welsh Water to collaborate with catchment partners and deliver multiple benefit solutions.

All PR24 Nutrient investment drivers are being screened for Nature Based Solutions (NBS), as we aim to embed NBS as a business as usual option for us.

Our first collaborative wetlands in Herefordshire received flows in September 2022. This wetland is owned and managed by Herefordshire Council to deliver nutrient credits to the development sector. The scheme has been a multisector collaboration, and the first of its kind.

## 6. Cardigan Wastewater Treatment Works

Cardigan Wastewater Treatment Works (WwTW) was built in 2004 and commissioned over the course of four years. The site serves a population of 5,707. This covers the Cardigan area, Gwbert, Penparc and St Dogmaels. The works was built using a treatment process which uses membranes to filter and treat sewage. This process was chosen for several characteristics, not only was it innovative new technology, but the small footprint meant it could be constructed within the existing boundary of the treatment works. The process also, by its nature, provides the treated effluent disinfection required given the proximity of the treated effluent outfall to the designated bathing water at Poppit West.

However parts of the sewerage network draining to the sewage works suffers from seawater infiltration during high or spring tides which leads to the wide variation in the salinity of the sewage arriving at the works and this, in turn, has a negative impact on the ability of the membrane process to treat the volume required. The bacteria in the treatment process excrete an enzyme to protect themselves from the salinity. That enzyme coats the membrane reducing the flows that pass through the membrane and forward through the plant. This was not known at the time of installation, and it is the change in salinity that triggers this response, so different tide heights cause differing concentrations of seawater mixing with the sewage, impeding flows passing through the process.

Flows which cannot pass through the membrane received partial treatment, they are screened, through normal 6mm screens and then through a further 1mm screening process and then are settled in tanks, to remove the solids. It therefore incorrect to say that raw sewage is discharged. This level of treatment is equivalent to that which is released into the environment from the hundreds of private septic tanks in the catchment.

We have already made changes and alterations to the site that has successfully improved the performance of the membrane process but the treatment process has deteriorated again and this has led us to the decision to replace the treatment process. Given one of the characteristics of a membrane plant was its very small footprint, any replacement scheme becomes a very large and complex operation, and as such we have to build a much larger process and keep the existing plant in operation until we can switch over. This requires planning permissions and expansion of the site.

We agreed with NRW that we needed to find a process that could operate successfully with varying levels of seawater present in the sewage, so we agreed to pilot two different processes over a 12 month period to see which process could operate successfully in these difficult conditions. One of the processes we trialled has been found to operate successfully and so the detailed design is under way and the funds to carry this wholesale rebuild are included in our AMP8 investment plan.

In 2018 we carried out a detailed study into the estuary, the factors which impact water quality and particularly the bathing water at Poppit Sands. That study showed that the storm tank effluent from Cardigan WwTW, contributes around 1% of the pollution load within the estuary, in comparison to 30% coming down the Teifi river and 60% down the river in wet weather. Poppit West bathing water has achieved the highest standard *excellent* classification every year between 2018 and 2022. The regulatory responsibility for river and marine water quality sampling rests with NRW and we are not

aware that they have any data that points to any significant impact from the treatment works discharges.

We are currently in the detailed design phase for the new works. Whilst we aim to start building the works in 2025, if we can accelerate the programme, we will.

The timeline below sets out the work we have done specifically related to Cardigan WwTW flow compliance.

<b>Date</b>	<b>Correspondence Type</b>	<b>Comment</b>
24 <sup>th</sup> June 2014	Letter from NRW to DCWW	NRW undertook their first assessment of pass forward flow (PFF) sites by estimating whether we were treating the required maximum flows based on a crude assessment of whether max volume treated equated to 3 x DWF (“dry weather flow”). This caused them to question 153 sites.
29 <sup>th</sup> July 2014	Meeting	DCWW explained that the NRW assessment was too crude and did not relate directly to the flow conditions. We proposed a flow methodology which they noted was a positive step and welcomed us adopting this to generate an annual self-reporting process for FPF compliance risk. *
24 <sup>th</sup> Sept 2014	Letter from DCWW to NRW	Applying this new agreed methodology to all the sites with DWF meters we responded to NRW letter of 24 <sup>th</sup> June reporting a number of sites at risk of not treating flows, including Cardigan.
9 <sup>th</sup> July 2015	OSM inspection at Cardigan	NRW inspected the works and noted 1 breach of permit noting there was flow that would have been discharged to the Teifi without passing through the treatment process
10 <sup>th</sup> August 2015	Compliance Assessment Report (CAR) issued by NRW to DCWW on Cardigan	Requesting response on permit breach for using storm tanks before a storm event and not treating the required flow – 7 actions on DCWW
04 September 2015	DCWW response to NRW Compliance Assessment Report (CAR)	We responded to all 7 actions and NRW confirmed they were happy with response. We agreed to accelerate drainage study for the catchment and any network defects found as part of the survey would be resolved. We also committed to installing EDM monitoring across our sites in 2016 in order to refine the FPF methodology by

		making possible accurate analysis of storm tanks flows.
2015-2019		<p>Various measures taken to improve the effectiveness of Cardigan were delivered including:</p> <ul style="list-style-type: none"> <li>• Replaced storm screens.</li> <li>• Created more storm capacity to ensure we have enough for permit requirement and flow balancing.</li> <li>• Replaced 50% of the membranes (another 50% being done in 2023)</li> <li>• Replaced inlet control PLC.</li> <li>• Completed the drainage study (SDP) and identified hotspot areas for inflows.</li> <li>• Undertook work on valves in network.</li> <li>• Lined 197m sewer along the Strand in Cardigan</li> <li>• Increased the cleaning cycle for the membranes.</li> </ul>
23 <sup>rd</sup> August 2019	Environmental Permit Regulations (EPR) Assessment Audit Inspection at Cardigan wwtw by NRW	NRW inspected the works and noted issues with flows and storm tanks.
22 <sup>nd</sup> November 2019	2 CAR forms issued by NRW to DCWW	Issues noted with Flow and Storm tanks – NRW requested a plan of works to prevent untreated sewage being discharged due to high levels of salinity
19 December 2019	Meeting regarding Cardigan WwTW	DCWW met with NRW to discuss saline intrusion and issues at Cardigan following on from the issue of CARs after an EPR inspection
23 January 2020	Statutory Enforcement notice – Cardigan#1	Notice issued for 2 breaches of permit at Cardigan
28 May 2020	Statutory Notice response by DCWW – Cardigan#1	Response to notice sent to NRW outlining investigations to date and planned pilot trial of different processes able to cope with saline environment.
1 <sup>st</sup> October 2020	Statutory Enforcement Notice– Cardigan#2	Notice for permit breaches as a follow on to previous notice, requesting further work and pilot trials of the alternative treatment processes to be undertaken by Jan 2022.
13 <sup>th</sup> Jan 2022	Statutory Notice response by DCWW – Cardigan#2	Pilot plant study report and saline investigation reports sent to NRW. This successfully identified that one of the piloted

		processes would work with the salinity present, but the installation of that process would require a complete works rebuild.
23 <sup>rd</sup> 2023	October NRW issue new Enforcement Notice on Cardigan #3	Notice in response to DCWW letter of 13 <sup>th</sup> January acknowledging the work done to assess treatment options and the work to reduce salinity. It requires DCWW to inform NRW before 31/3/25, when, during the period 2025-2030, the full solution (rebuild of the treatment works) will be delivered.

\* In their pre-read document for the Annual Review of 2014 Performance NRW noted that “DCWW have developed an agreed methodology for assessing Pass Forward Flow Compliance and are carrying out this assessment annually. Any failing sites are self-reported to NRW and the required improvements are developed and delivered in line with the Dry Weather Flow Methodology”.

It was disingenuous of the BBC and Professor Hammond to assert that “they uncovered this”. We have been open with our regulators throughout this whole period and we shared with the BBC and Professor Hammond the data that we had been also supplying NRW every 6 months since 2016.

We have complained formally to the BBC about their coverage of this issue.

#### 6.1 Regulatory Reporting of relevant data

Since 2014 DCWW has self-reported performance against FPF to our environmental regulators. By 2018 this turned into a series of annual letters to EA and NRW regarding our self-assessment of compliance and then a series of six-monthly meetings with both regulators setting out our progress with a 5-step process: root cause analysis, solution development, delivery, monitoring (where we assess if the intervention has been successful and effective), and handover as compliant.

Since 2022, with the installation of the new AMP7 flow meters and the new industry guidance around how to assess compliance, there is much greater accuracy to the assessment of FPF compliance. As a consequence, we have seen an increase in sites being assessed as non-compliant, the causes of which are analysed, and solutions developed and delivered.

The table below is the picture of flow compliance reported to NRW and EA over the last few years. Clearly with the bulk of the new flow meters installed in the last 12 months, flow compliance for 2023 reporting will be much larger but this will be the peak and subsequent years will reduce as we tackle these sites.

Stage	Number of Sites								
	2013	2015	2016	2017	2018	2019	2020	2021	2022 <sup>4</sup>
<i>Progressing with RCA</i>	0	0	0	0	0	1	0	0	10
<i>Solution Development</i>	1	0	2	0	0	1	4	6	20
<i>In Delivery</i>	6	0	2	3	1	3	1	7	7
<i>Monitoring &amp; Handover</i>	3	2	0	1	1	5	4	2	10
<i>Total Ongoing</i>	10	2	4	4	2	10	9	15	47
<i>Total Resolved (Compliant)</i>	17	6	1	2	2	1	1	9	0

We have committed to NRW and EA that all the sites listed above up to and including 2022 will be resolved during AMP7, apart from Cardigan, which is set out separately, and Dale WwTW, where, in agreement with NRW, we are examining the options to remove the treatments all together and pump the sewage away to a nearby WwTW. Both sites will be resolved during AMP8.

As can be seen from the 2022 list where a good number of the sites identified have seen a solution completed, or are in progress, within a year. Some of the reasons for non-compliance are data recording issues, and some are minor fixes like new impellers on pumps or improved control software.

Since 2018 a summary of FPF compliance has been included in the Annual Performance Meetings the company holds with NRW/EA/OFWAT and more recently including Welsh Government.

We have also included flow compliance within the Annual Risk and Compliance Statements for 2021/22 and 2022/23, given the material number of sites shown to be non-compliant following the installation of the new flow meters and the agreement of the new methodology.

**7. Environmental Performance Assessment (The text below is the same as that included in the letter sent from Peter Perry to the Chair of the Committee on 4<sup>th</sup> August)**

Despite the disappointment of being downgraded to a 2\* Environmental Performance Assessment (EPA) rating in 2022, I want to assure you that we will be doing all we can to recover this and I thought it would be helpful if I set out the recent trend against these key environmental metrics contributing to the EPA.

Year	WWTW (Waste water treatment works – 597 in total)	WWTW Discharge Permit Compliance	Serious pollutions	Total pollutions	Self-reporting of pollution	EPA Rating
2019	5	98.3%	2	95	73%	3*
2020	3	99.7%	3	77	80%	4*
2021	5	98.3%	3	83	76%	3*
2022	6	98.7%	5	89 <sup>1</sup>	69%	2*

(<sup>1</sup> 89 total incidents was the 2<sup>nd</sup> lowest number of incidents recorded by Water & Sewerage Companies in England and Wales in 2022).

In line with our commitment to the First Minister, our Board places the highest priority on achieving the best possible standards of environmental performance. We take great pride in Wales having a significantly better record of waterbodies’ ecological performance than England, and in the number of blue flag bathing beaches in Wales. That pride is not just at Board level – it is shared by our people throughout the company, particularly on the wastewater side of our business, whose recent engagement survey results show that they are deeply committed to what they do for the environment and for Wales. That is why moving from 3\* to 2\* EPA as a consequence of the assessment placed on the 2 serious pollution incidents was of such significance to us.

Not as an excuse, but as an important factor in terms of our overall pollution performance, the drought and high temperatures experienced in 2022 should be taken into account when assessing our pollution performance. During the drought we saw some of the lowest ever river levels in Wales whereby any blockage leading to a sewage spill had a higher impact. Similarly, the lower flows in sewers saw our blockage rate increase by 7% leading to an increased risk of pollution.

The primary reason for the dip to 2\* EPA rating relates to a slight increase (2) in serious pollution incidents. The incidents were:

- **Crundale, Pembrokeshire** – a third party discharge from a local trader caused our pumping station to block and an emergency overflow activated. Regrettably, our remote telemetry alarm did not activate at the time. This has subsequently been rectified and similar installations inspected across Wales.



- **Cadoxton, Barry** – a connection was made by a developer to an abandoned sewer without our knowledge. We will continue close liaison with developers, but it is difficult to predict this type of incident.

- **Kilgetty sewage pumping station, Pembrokeshire** – there was a blockage on the final chamber before the pumps due to wet wipe detritus. We will therefore increase future inspections at the site.

- **Bridgend** – the incident was caused by a sewer blockage. We have increased inspection and monitoring to prevent recurrence.

- **Trebanos waste water treatment works, Swansea** – the discharge of storm water on this occasion was compliant with the treatment work’s permit, but it was still designated as a pollution incident by Natural Resources Wales. We are investing over £20m to improve the the plant in our next regulatory period 2025 – 2030.

As a means of comparison with performance across the sector the table below shows that two companies had more than 10 serious pollutions incidents and only two reported zero such incidents.

<b>Number of Serious Incidents 2022</b>	0 incidents	1 incident	2 incidents	4 incidents	5 incidents	> 10 Incidents	> 15 incidents
<b>Number of Water Companies</b>	2	1	1	1	2	1	1*

\* 19 serious incidents were actually reported

In terms of total non-serious pollution, the incidents occurred as follows;

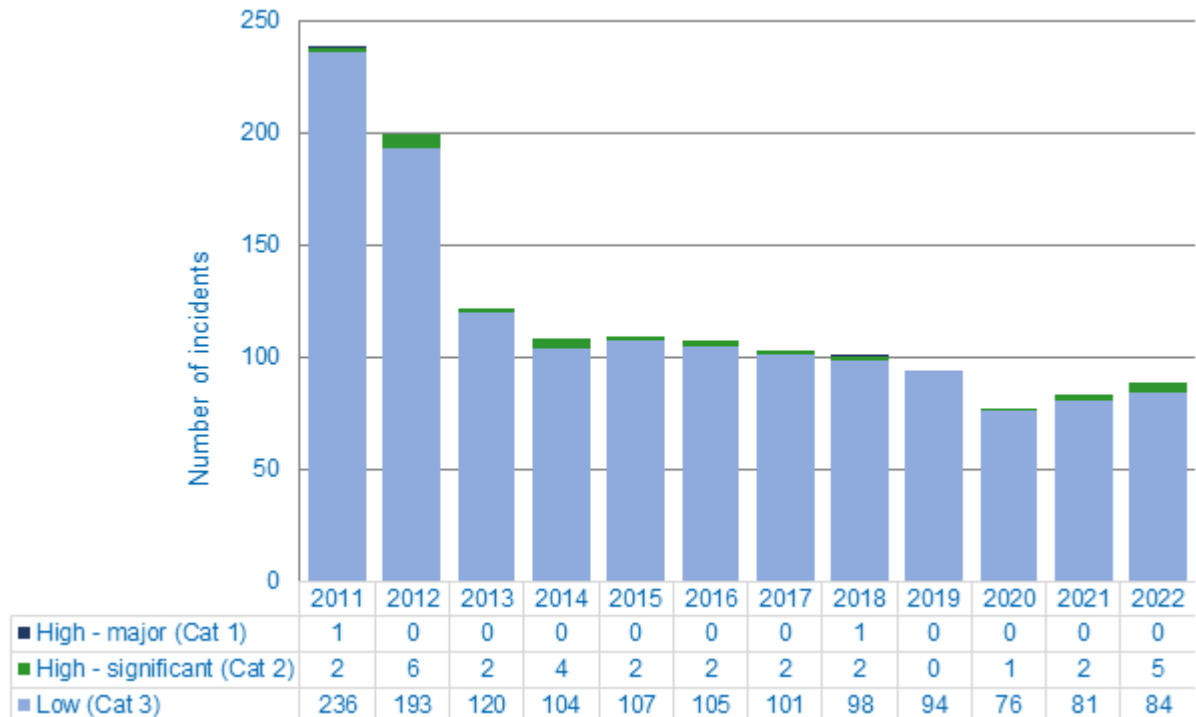
<b>Year</b>	<b>Foul Sewer</b>	<b>Combined Storm Overflow</b>	<b>Pumped Sewer</b>	<b>Pumping Station</b>	<b>Treatment Works</b>
<b>2021</b>	37	15	12	12	8
<b>2022</b>	47*	9	4	18**	11***

\* Increase due to low flows in sewers due to 2022 drought conditions

\*\* Increase due to blockages and minor levels of equipment failure

\*\*\* Increase linked to low river levels into which treated effluent discharged and due to drought conditions had more impact / was more visible

The table below shows the total pollution incidents per year since 2011.



The above data and more historical information is used to develop and implement our evidence-led improvement plans.

We have a comprehensive pollution reduction strategy combining a range of specific improvement activities which I have summarised below:

- **AMP7 (2020 – 2025) Capital Investment** - £52m has been allocated to reduce pollution risk. In addition, planned maintenance of sewers, storm overflows, sewage pumping stations and wastewater treatment works covered in our overall £830m waste water investment programme in AMP7.
- **Sewer Remote Monitoring** – early predictive warning alarms to enable earliest intervention, forming part of our wider ‘Smart Network’ programme. This combines real time data with a data science analytical approach to model our network and target preventative interventions. We have also increased the inspection frequency of sewer pumping mains, particularly those which are known serious incident risk assets. These monitors have helped us reduce sewer flooding (arguably the worst type of service failure for our customers) and where we have the best performance records in the industry despite the high rainfall in Wales.
- For above ground assets such as sewage pumping stations and treatment works we are installing new remote monitoring to confirm pumping capacity and flow measurement.
- **High Risk Asset Emergency Plans** – specific plans aimed at preventing potential high impact incidents. Including assessment and plans to deal with factors such as loss of mains power.

- **‘Stop the Block’ Campaign** – with over 90% of first time pollutions attributable to sewer blockages caused by wet wipes containing plastic, this is our effort to raise public awareness generally to prevent ‘sewer abuse’ but to target communities with emerging or known blockage history. This also includes working with traders to reduce fat and oil disposal to sewers, with the power to prosecute persistent offenders. We would welcome Welsh and UK Governments including these items in the list of banned single use plastic items.
- **Capability and engagement of our people** – we invest in providing our people with the latest maintenance equipment and the training to go with it. We have a sewer jetting simulation rig at our training centre in Abercynon. The awareness of preventing pollution and protecting the environment more generally is the subject of team meetings / briefings and is supported from the Executive team through communication such as my live call to all colleagues each month. We have also invested in River Quality Liaison Managers and more Pollution Prevention Technicians covering Wales, who interact daily with local communities and interest groups in river catchment areas. Our waste water teams are provided with performance target information and encouraged to contribute to our improvement plans.

Overarching our improvement plans deployment is regular oversight and constructive challenge from our Executive team and our Board. The Quality & Safety Committee of our Board (QSC), is unique in the sector, and is responsible for the detailed scrutiny of our performance which underlies it holding our management to account. It is also closely involved with the development of environmental improvement strategies. It includes an independent expert advisor (a former strategy Director of a leading water company and currently a respected environmental consultant) to aid scrutiny and to provide challenge in terms of our deployment of effective improvement plans and contemporary use of technology etc.

In terms of lessons learned from 2022 I would summarise as follows:

- We have an increasing level of remote monitoring technology equipment installed at our assets. Ensuring a consistent level of management oversight of the operation and maintenance of this technology is critically important. This is linked to the Crundale incident referenced above.
- Linked to the above, we will also continue to roll out remote monitoring equipment to confirm pump operation and equipment is online and performing to expected standard status.
- Ensuring that we are targeting future investment to mitigate potentially high risk assets – this includes £170m to replace strategic sewer pumping mains in north and south Wales. We will also increase levels of capital maintenance with a proposal to double sewer maintenance by £50m in AMP 8 (2025 – 2030).
- Continue to develop our Smart Network capability, with a sustained level of focus on potential new technology and ways of working to prevent pollution risk. (See *Comparing Performance with Other Companies* section below).

- Continue with public engagement to reduce the incidence of sewer blockages and continue to lobby for a plastic wet wipe ban in Wales.
- Our serious pollution risk assessment indicates that the greatest threat in terms of future incident lies with failure of a number of strategic sewage pumping mains. Such as the South East Wales Coastal Main, Kinmel Main in north Wales and the Bynea Main in south west Wales. We have included these in our AMP 8 investment plans. Clearly this will need regulatory approval to help mitigate these significant risks.

Given the scale of the challenge, with the number of assets, we are targeting returning to a 3-star performing company in 2024 and our AMP8 investment plan will allow us to further target returning to a 4-star company.

## **8. Ofwat Water Company Performance Report 2022/23**

In October 2023 Ofwat published their Water Company Performance Report for 2022/23. This report assesses and compares the annual performance achieved on 12 common measures by all water and wastewater companies in England and Wales.

Each company's assessment is based on performance on 12 common performance metrics.

Ofwat groups companies into three categories relative to each other (leading, average and lagging behind) based on how they have performed against the performance commitment levels.

In 2022/23 Ofwat has not assessed any company as 'leading'. Ofwat requires companies in the lagging behind category to publish service commitment plans, outlining when and how customers will receive the service they expect.

Welsh Water has met or exceeded its performance commitments in 5 out of 12 areas and is a top performer for the industry on internal sewer flooding. However, Ofwat assessed performance in the other 7 areas as being behind expectations and requiring and as a result, categorised Welsh Water as 'lagging behind'.

We have prepared a Service Commitment Plan that sets out the actions being taken as part of a recovery plan to return those performance levels assessed as not meeting expectations to the targeted levels our customers, stakeholders and regulators rightly expect.

Action plans have been developed based on a detailed understanding of the drivers of historic performance. These plans were already being proactively delivered as part of a recovery plan to return performance to targetted levels as quickly as possible. These are now being formalised and shared with Ofwat.

Root cause analysis has helped shaped the actions and prioritisation of those actions to return performance to targeted levels.

This service commitment plan addresses performance in the following areas:

- Leakage
- Per capita consumption
- Supply interruptions
- Drinking water quality
- Mains repairs
- Pollutions
- Treatment works compliance

Individual sections on each of the performance measures considers:

- Root cause analysis of underperformance
- Clear actions based on those root causes
- Benefits linked to those actions
- Expected forward trajectory of performance for future years

## 9. Business Plan 2025-30

Dŵr Cymru Welsh Water has submitted its proposed Business Plan (the 'Plan') for 2025-30 to Ofwat, the water industry regulator.

If approved, the Plan will result in the company's biggest ever investment programme, worth £3.5 billion investment over the five years, which will be equivalent to a 68% increase on the investment between 2020 and 2025.

A key focus of the Plan is to adopt a collaborative approach to reducing its impact on the environment, in particular playing its part in helping improve river water quality. Welsh Water is committing to invest nearly £1.9 billion in the environment between 2025 and 2030 – 84% more than across 2020-25. This will include substantially reducing phosphorous discharges from wastewater treatment to rivers in Special Areas of Conservation and starting on a multi-AMP programme to stop its network of 2,300 storm overflows causing ecological harm to rivers in its operating area.

Based on current performance (2022/23), the company's other key commitments by 2030 include:

- Improving **drinking water compliance and reducing by 57% contacts from customers about tap water quality** ;
- **reducing leakage by a quarter** in its network (against 2019-20 baseline) and helping customers address leaks in their homes and businesses;
- **reducing the total number of pollution incidents by 24%**;
- working towards a 'lead free Wales' by **replacing 7,500 customers' lead pipes**;
- **delivering £42 million of savings** on operating costs through efficiencies and innovative ways of working
- **contributing £13 million a year between 2025-30** to help maintain its social tariffs schemes and provide capacity to increase their coverage from 133,000 to 190,000 customers

By delivering this Plan, Welsh Water will contribute even more to the Welsh economy, building on the £1 billion it contributes now each year, and supporting more than 9,000 full time jobs. The Plan also reaffirms its intention to become a carbon neutral company by 2040, finding ways to deliver a major capital investment programme in low carbon and nature-friendly ways.

To support funding this ambitious and far-reaching investment programme, the average monthly bill will need to be £5 higher in 2025, and £10 by 2030. The company’s research has shown that 84% of customers find the plan acceptable – the highest in the sector. Recognising the ongoing cost-of-living challenges facing its customers, Welsh Water plans to increase the sector-leading support it provides to customers in vulnerable circumstances, deploying funding made possible by its not-for-profit status.

The development of this five year Plan has been shaped by household and business customers and by the strategic steers set by the PR24 Forum led by Welsh Government. It prioritises improving river water quality and addressing the challenge of storm overflows, enhancing key services, and strengthening resilience against the challenges facing the company, in particular climate change.

## 10. Customer Bills

As the charts below show, whilst the overall bill is second highest, looking at the cost of the bill separately for water and wastewater services points towards the underlying reason for the “high” bill. The water element of the bill is amongst the lowest in the sector, but the wastewater element of the bill is significantly higher. Whilst there was significant investment pre-privatisation in the treatment of sewage discharged to rivers and therefore paid for by taxpayers, the treatment of sewage discharged to the seas was only dealt with post-privatisation and therefore paid for by customers. Companies with the highest proportion of coastal cities, towns and communities have the highest wastewater bills.

	Total		Water		Waste
South West*	526	Wessex	261	South West	310
Wessex	504	Thames	258	DCWW	306
DCWW	499	Anglian	222	Anglian	270
Anglian	492	South West	216	Southern	253
Thames	456	Severn Trent	213	Yorkshire	248
Yorkshire	446	United Utilities	210	Wessex	243
United Utilities	443	Yorkshire	198	United Utilities	233
Southern	439	Hafren Dyfrdwy	195	Severn Trent	206
Severn Trent	419	DCWW	193	Northumbrian	203
Northumbrian	391	Northumbrian	188	Thames	198
Hafren Dyfrdwy	372	Southern	186	Hafren Dyfrdwy	177
Average	<u>453</u>		<u>213</u>		<u>241</u>

\* adding back the £50 rebate from the UK Government

As Wales has 15% of the UK’s coastline (compared to 5% of the population), significantly more investment was required to meet increased bathing water quality standards. All but one designated

bathing waters in Wales meet at least “good” water quality standards as a result of the investment over the past 30 years and 80% meet “Excellent” standard.

Whilst, our water bill has been high compared to the rest of the sector since privatisation. Comparing price increases across the sector, our bill has increased only 6% in real terms (2022/3 prices, using CPIH) since Glas acquired Welsh Water as a not for profit company in 2001. This compares to increases of up to 35% in other companies. For over a decade we kept bill increases below the rate of inflation whilst also significantly increasing our financial support for customers struggling to pay their bills which is sector leading. This is funded in part by financial surpluses that in some companies would be used to pay dividends to shareholders. This contribution is expected to total £60m in the five years to 2025.

Early analysis of companies business plans for 2025-30 show that the average household bill will increase by 32% compared to Welsh Water’s projected increase of 26%. The highest proposed increase in the sector is 66% over the period. However, having compared the proposed increases by all of the companies in the water sector, by 2030, our bill expected to be the 7<sup>th</sup> highest in the sector.

# Diweddariad Tachwedd 2023 a'r cynnydd hyd yma ar argymhellion y Pwyllgor Newid Hinsawdd, Seilwaith a'r Amgylchedd

**Argymhelliad 2: Rhaid i ni weld cynnydd amlwg yn y gwaith gan CNC i ddod â gorlifoedd storm 'heb eu trwyddedu' o fewn y gyfundrefn reoleiddio. Disgwyliwn i CNC adrodd yn ôl i'r pwyllgor ar gynnydd heb fod yn hwyrach na chwe mis o gyhoeddi'r adroddiad hwn.**

Ar 26 Hydref 2023, cyhoeddodd CNC ddau ddarn o ganllawiau i gwmnïau dŵr yng Nghymru ar ddsbarthu ac asesu gorlifoedd storm a'r broses ar gyfer trwyddedu gorlifoedd heb drwydded (y rhai sydd heb drwydded Rheoliadau Trwyddedu Amgylcheddol ar hyn o bryd).

**Asesu Gorlifoedd Storm (GN066)** Mae'r canllawiau'n amlinellu'r meini prawf, y broses a'r fethodoleg y dylai cwmnïau dŵr a charthffosiaeth eu defnyddio i ddsbarthu perfformiad gorlifoedd storm â thrwydded a'r rhai heb drwydded.

Bydd y dosbarthiad yn cael ei ddefnyddio i gynllunio a blaenoriaethu gwelliannau i ddod â holl orlifoedd storm i statws boddhaol. Yn gyntaf, disgwyliwn i gwmnïau dŵr flaenoriaethu'r asedau hynny sy'n achosi niwed gyda rhaglen ar gyfer gwella'r holl asedau eraill i fod yn foddhaol dros y cylchoedd buddsoddi sydd i ddod.

O dan ein canllawiau newydd, mae'n rhaid i gwmnïau dŵr ddsbarthu eu holl orlifoedd storm yn 'foddhaol', 'yn is na'r safon' neu'n 'anfoddhaol'.

Bydd hyn yn ein galluogi ni fel rheoleiddiwr i nodi lle gall asedau fod yn achosi niwed i'r amgylchedd yn well ac yn helpu'r cwmnïau dŵr i ganolbwyntio eu gwaith cynnal a chadw a buddsoddi'n well.

Mae'r canllawiau hefyd yn gosod diffiniadau clir o'r amodau y caniateir i orlif storm ollwng o dan ei drwydded amgylcheddol.

Mae hyn yn cynnwys diffiniadau o'r hyn sy'n gyfystyr â 'gollyngiad diwrnod sych' a'r cyfansymiau glawiad gofynnol i gyfiawnhau gollyngiad yn ystod 'glawiad trwm' gan ddefnyddio diffiniadau a osodwyd gan y Swyddfa Dywydd.

Mae'r **Canllawiau Gorlifoedd Storm heb Drwydded (GN021)** yn nodi'r camau y mae'n rhaid i chi eu cymryd pan fyddwch yn bwriadu gwneud cais am drwydded Rheoliadau



Trwyddedu Amgylcheddol. Mae'r wybodaeth a gyflwynir gyda chais am drwydded yn dibynnu ar ddsbarthiad perfformiad y gorlif storm ac a yw'r gorlif storm yn gollwng yn uniongyrchol neu'n anuniongyrchol i safle gwarchodedig.

### **Argymhelliad 3: Dylai CNC a chwmnïau dŵr gyhoeddi data blynyddol a/neu wybodaeth am y gyfran o ollyngiadau carthion nad ydynt o fewn amodau'r drwydded, pa categori o ddigwyddiadau llygredd a fu oherwydd y rhain, ac a gymerwyd camau gorfodi ai peidio.**

Ym mis Gorffennaf 2023, cyhoeddwyd ein hadroddiadau perfformiad amgylcheddol blynyddol ar gyfer cwmnïau dŵr yn 2022 ar gyfer [Dŵr Cymru Welsh Water](#) a [Hafren Dyfrdwy](#). Ar gyfer 2022, gostyngodd perfformiad Dŵr Cymru o statws tair seren i statws dwy seren.

Wrth i ni barhau i symud ymlaen drwy gyfnod adrodd pum mlynedd newydd yr Asesiad Perfformiad Amgylcheddol (2021-25), rydym yn disgwyl i Dŵr Cymru wneud cynnydd cadarnhaol ar draws pob un o'r saith metrig. Bydd metrigau'r Asesiad Perfformiad Amgylcheddol yn parhau i dynhau dros gyfnod adrodd hwn yr Asesiad Perfformiad Amgylcheddol (2021-25), gan sicrhau bod targedau'n heriol i'r cwmni. Disgwylwn iddynt roi mesurau ar waith i adennill a chynnal statws uchel cwmni. Yn benodol:

- lleihau cyfanswm y digwyddiadau carthffosiaeth flwyddyn ar ôl blwyddyn – gan anelu at sero
- atal yr holl ddigwyddiadau llygredd difrifol (carthffosiaeth a chyflenwad dŵr) yn y tymor byr
- gwella cydymffurfedd ansawdd dŵr rhifol – i gyflawni 100%
- gwrthdroi'r dirywiad yn y niferoedd sy'n hunanadrodd am ddigwyddiadau llygredd, gyda ffocws penodol ar wella hunanadrodd yn sylweddol mewn gorsafoedd pwmpio a gweithfeydd trin carthion
- cynnal perfformiad o ran defnyddio a chael gwared ar slwtsh yn foddhaol
- cynnal 100% o ddarpariaeth Rhaglen Amgylchedd Genedlaethol y Cynllun Rheoli Asedau
- cynnal perfformiad ar y Mynegai Cydbwysedd rhwng Cyflenwad a Galw

Yn unol â chamau gweithredu'r map trywydd ar gyfer gorlifoedd storm, gwnaethom hefyd gyhoeddi ein hadroddiad ar ddyddiadau gollwng o ganlyniad i orlifoedd storm am y tro cyntaf. Bydd CNC yn parhau i ddatblygu'r adroddiad blynyddol ar gyfer blynyddoedd y dyfodol, gan sicrhau ei fod yn cyd-fynd ag argymhellion y pwyllgor, yn ogystal â gosod targedau ar gyfer ansawdd data fel rhan o'n hadroddiadau.

## **Argymhelliad 4: Dylai CNC, cwmnïau dŵr a rhanddeiliaid perthnasol eraill ddatblygu trefniadau monitro manylach gyda golwg ar ddeall effaith gollyngiadau carthion ar ddŵr sydd yn eu derbyn yn well. Wrth symud y gwaith hwn yn ei flaen, dylid ystyried rôl bosibl gwyddoniaeth dinasyddion o fewn trefniadau manylach.**

Bydd CNC yn cyhoeddi ei ganfyddiadau tystiolaeth ym mis Rhagfyr 2023 fel rhan o gynllun gweithredu gorlifoedd storm. Bydd yr adolygiad yn llywio datblygiad rhaglen fonitro a fydd yn cefnogi'r sylfaen dystiolaeth ac yn cael ei defnyddio ar y cyd â'r canllawiau CNC a gyhoeddwyd yn ddiweddar ar gyfer gorlifoedd storm a nodir uchod.

Un o'r gofynion ar gyfer cwmnïau sy'n rhan o'r Rhaglen Amgylchedd Genedlaethol o fewn y Rhaglen PR24 yw bod cwmnïau dŵr ac Ofwat yn sicrhau bod gwaith monitro a'r cyllid ar gyfer y gwaith monitro yn eu lle i gwmnïau dŵr fonitro gorlifoedd storm mewn lleoliadau y cytunwyd arnynt i ddarparu mwy o dystiolaeth a dealltwriaeth o effaith gorlifoedd storm ar yr amgylchedd.

Ar hyn o bryd, nid ydym yn bwriadu cyfarwyddo cwmnïau dŵr i fonitro pob ased ledled Cymru. Bydd ein rhaglen fonitro a thystiolaeth yn edrych ar leoliadau strategol i ddechrau ac yn ystyried y canfyddiadau cyn cytuno ar unrhyw ofynion ychwanegol.

## **Argymhelliad 8: Dylai CNC adrodd yn ôl i'r pwyllgor ar y camau a gymerwyd o ganlyniad i ganfyddiadau ymchwiliadau Ofwat ac Asiantaeth yr Amgylchedd a hynny cyn gynted ag y bo'n ymarferol. Dylai hyn gynnwys manylion unrhyw adolygiad o ddull cydymffurfio CNC, ac unrhyw waith a wnaed gyda'r cwmnïau dŵr, neu gamau gorfodi a gymerwyd yn eu herbyn, o ganlyniad i'r canfyddiadau hynny.**

Mae CNC yn cadw mewn cysylltiad agos ag Ofwat ac Asiantaeth yr Amgylchedd ynglŷn â statws presennol y ddau ymchwiliad. Mae CNC yn ymwybodol o'r datblygiadau ond yn cydnabod natur sensitif a chyfrinachol unrhyw ymchwiliad.

Bydd CNC yn parhau i ddatblygu ein hymagwedd at reoleiddio gollyngiadau ysbeidiol, fel yr amlinellir yn y cynllun gweithredu ar gyfer gorlifoedd storm, ond ni fydd yn oedi cyn ymateb i ganfyddiadau'r ddau ymchwiliad wrth i wybodaeth am gwmnïau Cymru gael ei rhannu ac rydym yn cadw'r hawl i gymryd camau gorfodi pan fo angen.

# Unpermitted storm overflows

Guidance note

**Reference number:** GN021

**Document Owner:** Head of Business, Regulation and Permitting

## What is this document about?

This guidance note should be used in conjunction with GN066 How to classify storm overflow performance. It outlines the steps a Water and Sewerage Company should take when a storm overflow does not have an environmental permit. The pre-application requirements may depend on the agreed SO classification.

## Who is this document for?

Water and Sewerage Companies

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## Version History

Document version	Date published	Summary of changes
1.0	26 October 2023	Document published

Review Date: October 2024

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# 1. Introduction

We expect Water and Sewerage Companies to design, construct and maintain sewerage systems to minimise pollution of the environment and provide long term sustainability in accordance with the Well-being of Future Generations (Wales) Act 2015 and other applicable legislation.

All storm overflows (SOs) are required to have an Environmental Permitting Regulations 2016 (EPR) permit to authorise water discharge activities. However, some SOs may not benefit from an EPR permit. This may be because some discharges were unknown at the time of privatisation. Since then, they may have been identified during water company survey work, regulatory compliance activity or brought to our attention by the public. They may also be identified for example, where a pumping station that has a permit to discharge during emergency conditions only, has been found to be responsive to rainfall.

Unpermitted SO discharges must either be brought into regulation (benefit from an EPR permit) within timescales specified in this guidance or be decommissioned.

This guidance note sets out the steps that you must take when you intend to apply for an EPR permit. The information submitted with a permit application is dependent on the classification of the SO performance and whether the SO discharges directly or indirectly into a protected site.

Guidance to classify an SO is provided in GN066 How to classify storm overflow performance.

## 2. Newly identified unpermitted storm overflows

When you identify a previously unknown SO that does not benefit from an EPR permit you should report it to us, via our Incident Communication Centre (ICC) as soon as is reasonably practical. Following the self-report, you should log the unpermitted SO and the date it was identified, on a tracking system agreed with us.

Water discharges that may contain polluting matter, from an asset that does not benefit from an EPR permit are considered unlawful. As such, we will follow our normal regulatory response and consider enforcement options in accordance with our Enforcement and Sanctions Policy.

If you are already aware of an unpermitted SO, you should confirm that it is recorded on the register we hold.

If you become aware of a [pumping station](#) emergency overflow that is responsive to rainfall and is not permitted as a storm overflow, you should [carry out the steps in section 5](#). We normally refuse permit applications for existing emergency overflows to operate as storm overflows that were not originally designed to include a SO.

### 3. Process overview

You will need to classify the SO asset as satisfactory, substandard, or unsatisfactory using the process described in GN066 How to classify storm overflow performance. This does not apply if it is your intention from the out-set to decommission it.

The environmental impact assessment, may take up to 24 months to complete. This timeframe allows sufficient time to carry out seasonal invertebrate sampling and complete sewer and river impact modelling.

The supporting information that determines the classification, should be submitted to us for agreement within 24 months of it being identified. The information we need to be able to agree the classification, is specified in GN066 How to classify storm overflow performance.

Where an SO is classified as substandard or unsatisfactory, an appropriate level of investigation must be undertaken to define the requirements necessary to bring the SO in line with satisfactory status.

Where a full Urban Pollution Management (UPM) study is required to identify a solution to a hydraulic issue, the investigation must be completed within 24 months from agreement of the classification status. If the root cause is not an hydraulic issue, we expect a solution to be identified no later than 12 months following agreement of the classification status. If these timeframes cannot be met, they must be agreed in writing with us.

Where an SO has been classified as substandard or unsatisfactory the permit application must contain details about how the SO will be brought into satisfactory condition. You are required to agree the timescale for delivery of the improvement scheme with us, as this will be incorporated into an improvement condition, when a permit is issued. A tracking system to monitor progress with the improvement condition, should be agreed with us.

After the classification has been agreed with us, you should apply for an EPR permit.

### Habitat Regulations Assessment (HRA)

A permit application should include a Habitat Regulations Assessment (HRA) if the SO discharges into a European protected site, namely a Special Area of Conservation (SAC), Special Protection Area (SPA) or a Ramsar site.

You should consult with us for the purposes of the HRA before submitting a permit application.

A HRA should be carried out in accordance with the Conservation of Habitats and Species Regulations 2017 and Welsh Government Guidance on HRAs.

A HRA may be required irrespective of whether the SO discharges directly into a SAC, SPA, Ramsar designated waters or indirectly. Check with our permitting department to clarify if there is a need to carry out a HRA as early as possible.

We will review the HRA as part of the application in the permit determination process and will only grant one, if we are satisfied that adverse effects will be avoided to protected sites.

## Decommissioning a storm overflow

If a SO is identified which is no longer required, you will not need to apply for a permit. You should still notify us when it has been identified.

Information about the proposals to decommission a SO should be supplied to us. We will need to agree them. A completion date must be provided, and proof of decommissioning supplied.

You should also advise us if the SO should have been removed during a previous Asset Management Programme (AMP) round, as part of a National Environment Programme (NEP) funded scheme.

## 4. Permit application requirements

### Satisfactory storm overflows

Where the SO meets the satisfactory criteria set out in GN066 How to classify storm overflow performance, you should log the SO classification with us for agreement.

A permit application should be made no later than one month following agreement of the classification. You can apply for an EPR permit without further work required upfront.

The application should include a [HRA](#) where applicable. It should demonstrate that the continued operation of the SO will not have any adverse effects on a protected site. You should always consult with us for the purposes of the HRA.

You will need to carry out regular maintenance to ensure that the SO does not become substandard or unsatisfactory in the future.

### Substandard storm overflows

When you have classified the SO as substandard, using the criteria set out in GN066 How to classify storm overflow performance, the following steps will need to be undertaken:

- Log the SO classification with us for agreement.
- If the overflow is substandard due to insufficient hydraulic capacity, a further 24-month period will be allotted following agreement of classification. You must carry out a study to define the requirements which will bring the SO in line with satisfactory status.
- If the overflow is substandard due to reasons other than insufficient hydraulic capacity, a further 12 months will be allotted following agreement of the classification. You must carry out a study to define the requirements which will bring the SO in line with satisfactory status.
- Consult with us if a HRA is required

- Apply for a permit
- If applicable, include the HRA in the application, provide evidence to demonstrate there will be no adverse effects
- Provide detail in the application about how the SO will be brought into satisfactory condition, including timescales.
- Agree timescales for delivery with us as they will be included in the permit as part of an improvement condition.
- Agree in advance with us, in writing, if there is likely to be any deviation from the above steps.

## Unsatisfactory storm overflows

When you have classified the SO as unsatisfactory, using the criteria set out in GN066 How to classify storm overflow performance, the following steps will need to be undertaken:

- Log the SO classification with us for agreement.
- Investigate and identify an improvement scheme within 24 months of agreeing the classification with us.
- Undertake a suitable [urban pollution management](#) (UPM) investigation to define the required solution.
- Agree the scope of the investigation with us in advance.
- Ensure there are no knock-on impacts at other SOs or terminal Wastewater Treatment Works (WwTW) unless this has been agreed as part of a wider catchment solution.
- Consult with us if a HRA is required.
- Apply for a permit after the UPM investigation.
- Include detail in the permit application on how the SO will be improved to satisfactory condition.
- If applicable, include the HRA in the application, provide evidence to demonstrate there will be no adverse effects.
- The timescale for delivery must be agreed with us, as it will be included in the permit as part of an improvement condition.
- Confirm that the delivery of the scheme will be no more than 3 years from the date of permit issue.
- Agree in advance with us, in writing, if there is likely to be any deviation from the above steps.

## Derogation requirements

If the SO is classified as unsatisfactory either wholly or partly because the [HRA](#) appropriate assessment is unable to rule out adverse effects on a SAC, SPA or Ramsar site, we may issue the permit as a derogation. We will only do this if we are satisfied that there are no alternative solutions and if there are imperative reasons of overriding public interest (IROPI) for the continued operation of the SO.

In the situation described above, permit applications for SOs classed as unsatisfactory wholly or partly due to impacts on a SAC, SPA, or Ramsar site, must also include the following information:



- Evidence to demonstrate that there are no alternative solutions to the continued operation of the SO.
- The reasons why decommissioning the SO is not an option.
- Evidence to show that the continued operation of the SO is necessary for IROPI.
- Information about how and when the proposed improvement plan (when implemented), will ensure that the SO will not adversely affect the SAC, SPA, or Ramsar site.

As part of the permit determination, we will review the HRA along with the information you provide, in support of a derogation. Before we can issue a permit of this nature, we are required to notify Welsh Government. They will either confirm that they have no objections to granting the permit or they may direct us, not to issue the permit pending further consideration. A decision will be made within 21 days.

## Urban Pollution Management (UPM)

UPM is a procedure for managing wastewater discharges from sewer and sewage treatment systems in wet weather, to meet the requirements of the receiving water in a cost-effective way. Use UPM to plan all work affecting storm overflows.

A permit application for an unsatisfactory storm overflow must include a report summarising the UPM procedure undertaken. This procedure must be directed at achieving the relevant environmental quality targets. The objective of no deterioration at point of mixing, must be met by all schemes.

Relevant details of the study undertaken, should include:

- environmental standards
- requirements for no deterioration of WFD water body status
- no deterioration in wet weather of the quality of receiving water (any percentile including percentiles higher than 99 and, or fundamental intermittent standards)
- emission standards
- design standards
- the modelling approach used
- the solution

The modelling undertaken, should include:

- type of model(s) used
- statements about each model's purpose
- its limitations and range of use
- its reliability
- types of sensitivity testing required
- method for using model(s)
- statement of fitness for purpose of the overall modelling plan
- scope and source of data used
- other discharges included in the assessment and length of stretch or area extent used in assessment

The solution summary, should include but is not limited to:

- modelling results
- solutions investigation optimisation analysis
- solution conceptual design
- solution compliance results
- solution audits
- assessment of risk of non-compliance through sensitivity analysis

You must carry out modelling work according to the following modelling codes of practice. These codes supplement the UPM procedure and provide specific guidance on modelling and data collection:

- Chartered Institute of Water and Environmental Management (CIWEM) Urban Drainage Group (UDG) code of practice for the hydraulic modelling of urban drainage systems
- Wastewater Planning Users Group (WaPUG) guide to quality modelling of sewer systems
- WaPUG river data collection guide
- WaPUG river modelling guide
- WaPUG integrated urban drainage modelling guide
- CIWEM UDG rainfall modelling guide

These [modelling codes of practice](#) (and any updates) are published by the CIWEM UDG.

Where permit applications are based on the outline or conceptual design you may need to agree subsequent changes that are proposed during the detailed design, by applying for a variation of your permit if it has already been issued.

Improvement condition(s) with the agreed scheme delivery date, shall be included in the permit, based on the conceptual solution.

## Solutions to unsatisfactory SOs

Traditionally, solutions to SOs classed as unsatisfactory, comprise one or more of the following elements:

- separation from combined system of sewers and drains carrying surface water flows only
- aesthetic controls (such as screens and scum boards)
- additional storm storage near the overflow (such as on-line, or off-line storage, upsized sewers)
- increased sewer capacity downstream (gravity sewer or pumped sewer)
- re-direction of upstream flows
- raising overflow levels or controlling flows through chamber to reduce spills
- reducing overflow outlet throttles
- preventing reverse flow from receiving water (non-return valves, relocated outfall)
- relocating point of discharge to less sensitive location
- green solutions to increase attenuation or as storage
- real time control of sewers to utilise more in sewer storage capacity

The option(s) selection should pay due regard to sustainability and to whole life carbon dioxide emissions.

## 5. Sewage pumping station discharges

You must [notify us](#) where you become aware that an emergency overflow is responsive to rainfall and operates as a storm overflow. If you do not intend to remove the hydraulic response to storms you must submit a report within 12 months of the notification, detailing the steps below. You must state the reason for retaining the storm overflow.

If a discharge from an emergency overflow indicates a hydraulic response to rainfall which is not covered by the conditions in the environmental permit, the following steps must be carried out:

- Provide details of the catchment's sewerage history and development.
- Provide the permitting history of the pumping station and the history of storm discharges.
- Provide evidence if the original design intent of the discharge was as an SO.
- Investigate the catchment to identify and quantify the cause of the storm discharges (such as connected to an impermeable area, infiltration, land drainage connections, shortfalls in pumping capacity, network deterioration, cross connections or growth).
- Provide the reason for any deterioration in performance.
- Construct a verified hydraulic model that predicts the observed storm discharges.
- Assess whether the sewerage system, including the pumping station, has been designed, constructed, and maintained according to best technical knowledge not entailing excessive costs (BTKNEEC)
- Develop a costed plan to deal with any shortfalls contributing to storm discharges for which you are responsible.
- Develop a plan to resolve inflows for which you are not directly responsible.
- Produce an action plan to implement this work together with relevant interested groups such as local authorities, householders, and landowners.
- Use the verified hydraulic model to predict the wet weather performance of the pumping station following the BTKNEEC improvements.
- Appraise options to resolve the need for residual storm discharges following the BTKNEEC improvements, including alternatives to a new SO.
- Provide evidence that pollution from the overflow will be limited according to BTKNEEC by following UPM procedure. You must meet all relevant water quality and aesthetic standards and minimise any deterioration in quality.

Where storm discharges are predicted to continue, we may consider permitting a new SO together with the BTKNEEC improvements.

We will normally refuse permits for existing emergency overflows to operate during storms where sewage pumping stations were not originally designed to include a SO.

If we accept there is no alternative following the steps carried out above, the SO must be classified and assessed against the criteria set out in GN066 How to classify storm overflow performance.

## Abbreviations

AMP	Asset management programme
BTKNEEC	Best technical knowledge not entailing excessive costs
CIWEM	Chartered Institution of Water and Environmental Management
EPR	Environmental permitting regulations
GN	Guidance note
HRA	Habitats regulations assessment
IROPI	Imperative reasons of overriding public interest
MCERTS	Monitoring certificate scheme
NEP	National environment programme
SAC	Special area of conservation
SO	Storm overflow
SPA	Special protection area
UDG	Urban drainage group
UPM	Urban pollution management
UWWTR	Urban wastewater treatment regulations
WaPUG	Wastewater planning users group
WFD	Water framework directive

# How to classify storm overflow performance

Guidance note

**Reference number:** GN066

**Document Owner:** Head of Business, Regulation and Permitting

## What is this document about?

This guidance outlines the criteria, process and methodology Water and Sewerage Companies should use to classify the performance of permitted and unpermitted storm overflows. The classification will be used to plan and prioritise improvements to bring all storm overflows up to satisfactory status.

There is additional guidance for unpermitted storm overflows in GN021 Unpermitted storm overflows.

## Who is this document for?

Water and Sewerage Companies

## Contact for queries and feedback

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## Version History

Document version	Date published	Summary of changes
1.0	26 October 2023	Document published

Review Date: October 2024

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# 1. Introduction

This guidance sets out the [definitions \(Section 2\)](#), [classification criteria \(Section 3\)](#), assessment methodology ([summary in Section 4](#) and [detail in Annex 1](#)) and [data collection and submission requirements \(Annex 2\)](#). Water and Sewerage Companies (WaSCs) must use it to classify storm overflows (SOs) as either:

- Satisfactory
- Substandard
- Unsatisfactory

The guidance is applicable to all SOs, unpermitted and permitted. It should be used for SOs that discharge to rivers and Transitional and Coastal (TraC) waters. For unpermitted SOs, WaSCs should also use GN021 Pre-application requirements for unpermitted storm overflows.

This guidance replaces the relevant sections in 7.01 How to comply with your environmental permit. Methodologies and scoring set out in User Guide for Assessing the Impact of Combined Sewer Overflows FR 0466 (Foundation for Water Research, 1994) and the Storm Overflow Assessment Framework (SOAF) (Environment Agency, 2018) should no longer be used.

## 1.1. Requirements

This guidance is underpinned by the [Urban Wastewater Treatment Regulations \(UWWTR\) 1994](#). We expect WaSCs to design, construct and maintain sewerage systems to limit pollution of the environment and provide long term sustainability.

SOs should not discharge on a [dry day](#). When a discharge from an SO on a dry day has been identified, it should be self-reported as soon as is reasonably practicable, not at the end of the classification process.

We will consider the appropriate regulatory response for SOs that are substandard or unsatisfactory. We may take enforcement action and or vary permits to add improvement conditions or amend existing conditions as appropriate.

We require WaSCs to assess and understand how their sewerage system is operating. WaSCs should notify us where there is potential or actual pollution from a SO. This guidance does not alter the existing requirement for WaSCs to self-report pollution incidents to us. WaSCs should also self-report when an unpermitted overflow is identified.

We expect WaSCs to ensure that SO classifications are kept up to date to reflect current performance if new evidence shows a change in performance. WaSCs should submit an updated assessment as soon as reasonably practicable.

The classification assessment should be focused on identifying and assessing hydraulic and engineering design issues that will need investment and scheme planning/design to resolve. If the SO has maintenance issues (for example blockages, siltation, worn pump impellers) you should notify us as soon as is reasonably practicable and ensure the issues are rectified as soon as possible. We would expect these types of issues to be resolved within 12 months from the date they are identified.

Data affected by the issue should be excluded from the assessment. For example, the relevant Event Duration Monitoring (EDM) annual dataset where high spills were caused by a partial blockage can be excluded from Stage 1 of the assessment, but this should be made clear in your assessment submission and evidence should be available on request (AOR).

## 1.2. Good practice

WaSCs must use Urban Pollution Manual (UPM) version 3.1 (Foundation for Water Research, 2018): <http://www.fwr.org/UPM3/>

WaSCs should follow all relevant good practice guides and codes, including those produced by CIWEM: <https://www.ciwem.org/special-interest-groups/urban-drainage-group>

## 2. Definitions

### 2.1 Flow passed forward (FPF)

FPF is defined as the rate of flow (litres per second) of the wastewater arriving at the overflow from its upstream collection system and passed forward to the [continuation flow](#). FPF must be maintained for the duration of the spill event, or the hydraulic capacity of the downstream sewer shall be deemed to have been exceeded (as per the individual permit condition of the SO).

For Wastewater Treatment Works (WwTW) and Last In Line (LIL) Sewage Pumping Stations (SPS), FPF does not include any flows drawn from a continuation flow that has already been passed forward by the overflow and reintroduced to the incoming flow upstream of that SO.

Achievement of FPF rate can be demonstrated using monitoring certificate scheme (MCERTS) accredited flow monitors or pumping station rates, using the permitting conditions as standard. In the absence of these data sources within the sewer network, DWMP (Drainage and Wastewater Management Plan) network models should be used. FPF rates for the duration of spills can be assessed to ensure that the permitted rate is being achieved.

### 2.2 Continuation flow

As defined in [Urban Pollution Management \(UPM\) manual version 3.1](#) (Foundation for Water Research, 2018), the continuation flow is the rate at which flow is passed forward for treatment from the structure or device. It is expressed as a proportion of the design peak inflow rate for the structure or device.

### 2.3 Formula A

Formula A is the flow passed forward to a network or terminal SO.

A minimum retained flow in the sewer of Formula A is the normal minimum requirement for SOs on the sewer network and for Last in Line (LIL) unsettled SOs at the inlet to a WwTW.

It is calculated as:

- Formula A (litre/day) = DWF + 1360P + 2E

Where:

- DWF = total [dry weather flow](#) (litre/day) calculated from PG + I + E
- P = catchment population (number)
- G = per capita domestic flow (litre/head/day)
- I = infiltration (litre/day)
- E = trade effluent flow (litre/day)

Where Formula A equivalent storage is provided at an SO and in very large sewerage systems where significant smoothing of flows occur, this can be considered in defining the performance equivalent to Formula A, subject to agreement with us.

Where there are significant areas within the catchment that were designed, and remain, separately drained, an allowance for separately drained areas may be made. You will need to provide evidence that the storm response in these sewers is minimal (less than or equal to 3DWF). Consequently, the minimum FPF required from those populations served by separately drained areas is:

- $3PsG + Is + 3Es$

Where:

- Ps = population in areas served by a separate system
- G = per capita domestic flow (litre/head/day)
- Is = infiltration flow from separately drained areas (litre/day)
- Es = trade flow from separately drained areas (litre/day)

Formula A becomes:

- Formula A (litre/day) = DWF + 2PsG + 1360 Pc + 2Et

and:

- $DWF \text{ (litre/day)} = PtG + It + Et$

Where:

- Pc = population in areas served by combined and partially separate sewers
- Pt = total population
- It = total infiltration (litre/day)
- Et = total trade flow (litre/day)

## 2.4 Flow to full treatment (FFT)

The WwTW must be designed to treat peak dry weather flow ([DWF](#)) and additional flows from light rainfall.

The normal minimum FPF is set as:

- Flow to full treatment (FFT) =  $3PG + I_{max} + 3E$

Where:

- P = catchment population (number)
- G = per capita domestic flow (litre/head/day)
- E = trade effluent flow (litre/day)

This FFT setting is also known as 3DWF.

$I_{max}$  is the maximum infiltration rate over the whole year. In certain circumstances you will need to consider the infiltration for summer and winter separately.

To find the maximum infiltration ( $I_{max}$ ), calculate infiltration for every dry day as:

- $I_{dry\ day} = \text{measured TDV} - PG - E$

The value of  $I$  within this calculation includes all flow above  $PG$  and  $E$ , thereby encompasses, groundwater infiltration, water entering a sewer, drain, or manhole chamber due to leaking joints, cracks, or faults or via purpose formed routes such as land drains and illegal connections. Where  $I_{max}$  exceeds 40% (typical rate as set out in [Future Impacts on Sewer Systems in England and Wales, report prepared for Ofwat by Mott MacDonald, June 2011](#)) of domestic flow an infiltration study needs to be undertaken to understand how to reduce this flow. A reduction plan which includes justification for not reducing infiltration, should be provided. This will include a definition of the extent of infiltration, identifying any point source discharges, along with a plan detailing the solutions and timescales for implementation.

## 2.5 Dry weather flow (DWF)

Dry weather flow (DWF) is the average daily flow to a WwTW during a period without rain.

The flow in a combined sewerage system will increase when it rains. This flow may vary seasonally due to changing levels of sewer infiltration and population numbers. You need to design your WwTW with enough capacity to treat the flows from the sewerage collection systems it serves.

It is calculated as the total daily flow value that is exceeded by 80% of the total daily flow values in any period of twelve months.

## 2.6 Dry day and dry day discharges

A “dry day” is a day (midnight-midnight) with total rainfall accumulation not exceeding 0.25 millimetres.

“One dry day” is one whole calendar day (midnight-midnight) after cessation of rainfall.

A “dry day discharge” is any discharge that occurs or continues on a “dry day”, allowing “one dry day” after rainfall ends. This provides allowance for network drain-down for the first dry day after rainfall or snowmelt.

For example, if rainfall ceases at 5pm on 10 December, a dry day discharge is where an overflow discharges any time after midnight on 12 December.

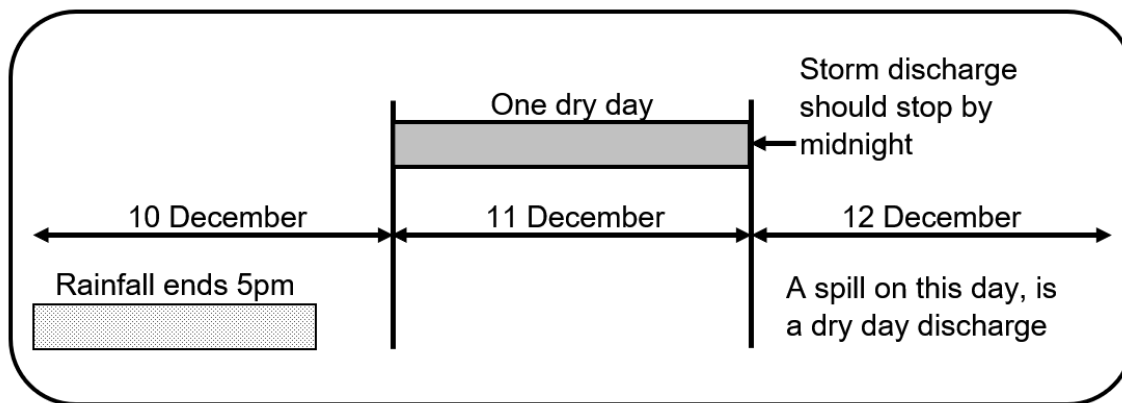


Figure 1. Diagram showing a dry day and a dry day discharge

Scenario	24-48 hours prior to spill	0-24 hours prior to spill	Spill	If spill occurs on dry day 0-24 hours after spill, classify spill as:	If spill occurs on dry day 24-48 hours after spill, classify spill as:
1	Dry day	Dry day	Yes	Unsatisfactory	Unsatisfactory
2	Dry day	Not dry day or heavy rain (>0.25 mm/day but less than 4 mm during any 1 hour)	Yes	Substandard	Unsatisfactory
3	Dry day	Heavy rain during any 1 hour	Yes	Satisfactory	Unsatisfactory

Table 1: Storm overflow spill rainfall assessment

## 2.7 Heavy rainfall

The Met Office classify rainfall above 4 millimetres per hour, as “heavy rainfall”. Where a rainfall event totalling 4 mm or more in any one-hour period has been recorded (at a representative rain gauge or triangulated rain gauge in the previous 24 hours), then the spill can be considered as “due to heavy rainfall”. Radar data may be used in the absence of representative rain gauge data where the approach is agreed with us.

## 2.8 Drain down time

SOs may operate, or continue to operate, after rainfall or snowmelt has ceased. This is due to the time it takes for water to enter the sewer system and the time it takes to travel

along the sewers to the relevant SO. We expect the allowable drain down time, in even the largest sewerage catchments, from directly and or positively drained areas (roofs, roads, pavements, drives, patios, yards), is highly unlikely to exceed 24 hours.

24 hours drain-down time is the minimum allowance for any given event when applying the one calendar day criterion, so the actual allowance may be higher depending on when the rainfall ceased.

Drain down times more than 24 hours are likely to be due to one or more of the following:

- run-off from indirectly drained (remote) areas
- land drains
- excessive infiltration

These are all unacceptable causes for a storm overflow to operate. They should be reduced, or the excess flow accommodated with the sewer system and WwTW treatment capacity.

## 2.9 Mixing zone

The mixing zone is defined as the location downstream from a discharge point where the discharge is adequately mixed with the waterbody. Typically, a distance equivalent to seven river widths can be used, but local conditions may mean it is less or more than this.

## 3. Criteria to classify a storm overflow

### 3.1 Satisfactory

There are specific criteria which must be met for a SO to be classified as satisfactory. The SO must:

- meet all minimum design standards
- be compliant with permit conditions
- have no environmental impact (includes aesthetic, biological, water quality, protected sites and groundwater).

### 3.2 Substandard

If the SO is compliant with the permit and does not have an environmental impact, but at least one of the following minimum design standards are not achieved, the SO will be classified as substandard, if it does not:

- discharge on a dry day
- contain flows up to heavy rainfall
- screen to 6 mm
- have adequate settled storm storage (storm tank only)
- have a FPF equal to FFT (storm tank only)
- pass forward Formula A (SO or SPS (Sewage Pumping Station) only).

### 3.3 Unsatisfactory

If any of the tests confirm unsatisfactory performance, the asset will be classified as unsatisfactory overall. The tests include:

- discharging on a dry day
- causing at least a low environmental impact (includes aesthetic, biological, water quality, protected sites and groundwater) as defined in [Annex 1](#)
- non-compliance with permit conditions.



## 4. Classification methodology summary

### 4.1 Overview

There are four stages in the Storm Overflow Classification Methodology, as summarised below. Detail on how to carry out the tests, score the assessment results and determine if any results confirm substandard or unsatisfactory status, are provided in [Annex 1 – Classification methodology](#).

The methodology has been developed from the User Guide for Assessing the Impact of Combined Sewer Overflows FR 0466 (Foundation for Water Research, 1994) and Storm Overflow Assessment Framework (SOAF) (Environment Agency, 2018) methodologies. This Guidance Note methodology replaces these documents. They should no longer be used or referenced.

If an SO has already been through the SOAF assessment, the WaSC can reuse the assessment results if they are still representative of the SOs current performance. However, the scoring and classification set out in this guidance must be used.

#### Stage 1: Minimum design standards

This stage has six tests:

1. [Dry day discharges](#)
2. [Heavy rainfall spills](#)
3. [6 mm screening](#)
4. [Settled storm storage](#) (storm tank only)
5. [FPF equal to FFT](#) (storm tank only)
6. [Passing forward Formula A](#) (SO or SPS only)

#### Stage 2: Permit compliance

This stage has four tests to check if the SO is compliant with permit conditions related to:

1. [FPF rate](#)
2. [Screen requirements](#)
3. [Storage requirements](#)
4. [Discharging only due to rainfall/snowmelt](#)

## Stage 3: Environmental impact assessment

This stage has three tests:

1. Stage 3a: Aesthetics, comprising of 6 elements:
  - [Pollution incidents](#)
  - [Substantiated public complaints](#)
  - [Sewage litter](#) (separate methodology for rivers and TraC waters)
  - [Sewage fungus on outfall](#) (separate methodology for rivers and TraC waters)
  - [Sewage fungus on substrate](#) (separate methodology for rivers and TraC waters)
  - [Amenity value](#)
2. [Stage 3b: Invertebrate \(biological\)](#) (separate methodology for rivers and TraC waters)
3. [Stage 3c: Water quality \(WQ\) modelling](#) (separate methodology for rivers and TraC waters)

## Stage 4: [Other evidence](#)

The WaSC should consider any other available sources of known information. If a SO causes an environmental impact which has not been evidenced in any other stage of the classification assessment, the information should be summarised in the submission to us.

## 4.2 The stages required

To ensure there is a robust assessment of SO performance that can be used for planning and prioritisation, for:

- permitted SOs you must complete stages 1, 2, 3a, 3b and 4. If 3b is not possible you must do 3c
- unpermitted SOs you must complete stages 1, 3a, 3b and 4. If 3b is not possible you must do 3c.

## 4.3 How to determine the overall classification

An unsatisfactory classification can be determined during any of the four stages.

A substandard classification can only be determined in Stage 1 (minimum design standards). But if any of the other tests are unsatisfactory, the final classification will be unsatisfactory.

A satisfactory classification can only be given if all four stages are passed.

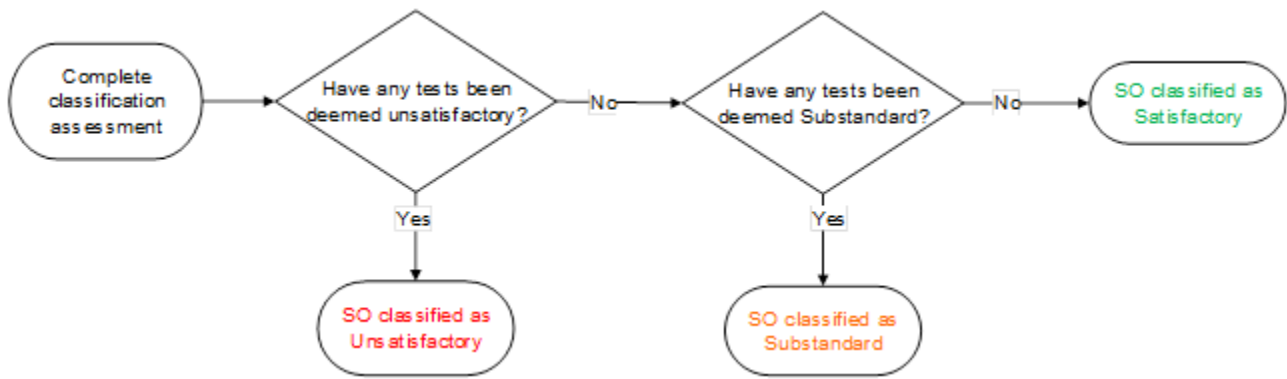


Figure 2: Flow chart for determining overall asset classification

## 4.4 Submission and confirmation of classification

Once the WaSC has completed the assessment, they should submit the assessment findings (specified in [Annex 2](#)) and evidence to us with a proposed classification. We will review the submission and once any queries or requests for further information have been resolved, we will confirm the classification.

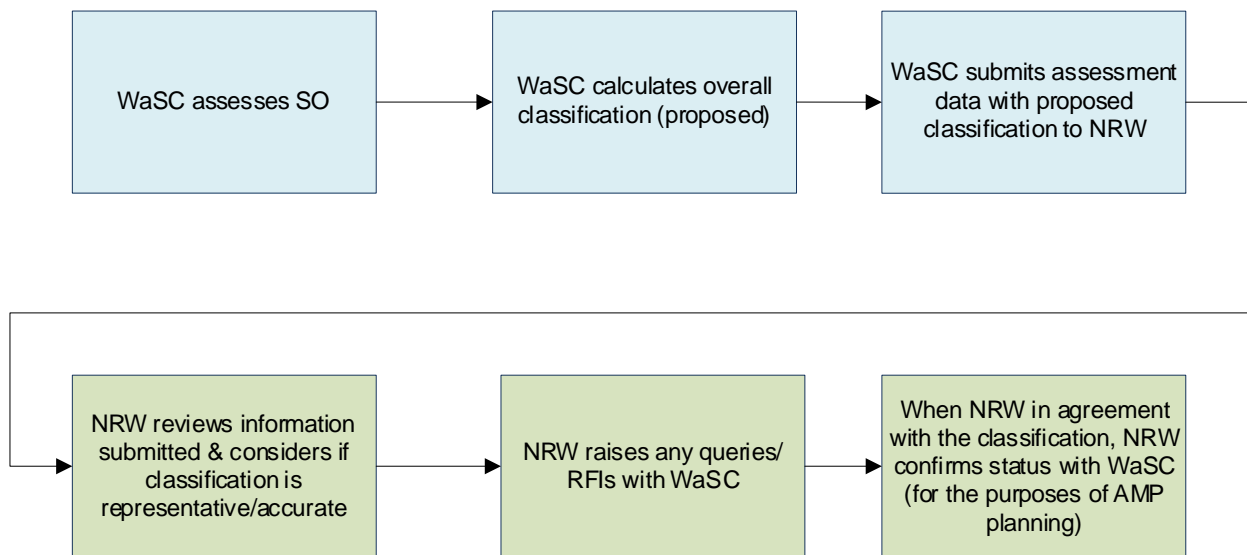


Figure 3: Flow chart showing how classification is confirmed

# Annex 1 – Classification methodology

## Stage 1 – Minimum Design Standards

### Test 1: Dry day discharges

WaSCs should use EDM recorded spills and rainfall data to assess:

“Does the SO have any dry day discharges in the last 3 years (minimum) that are due to hydraulic reasons?”

Yes = Unsatisfactory; No = Indicates satisfactory; N/A = EDM data not available

EDM recorded spills can be compared to rainfall records. For SOs where you have less than 3 years EDM data, provide what is available. Where maintenance issues, such as blockages, lead to dry day discharges, these can be excluded from the assessment if the WaSC can demonstrate that these have been fully investigated and rectified. The WaSC should make this clear in the assessment submission and provide evidence on request.

Where a dry day discharge is due to hydraulic reasons the SO will be classified as unsatisfactory.

Use rain gauge data that is the most representative for the SO. Where there is no nearby rain gauge, the three closest gauges can be triangulated. Radar data can be used where the approach is agreed with us.

Additional factors, as reported by the Met Office, will be considered as evidence for snow melt. Factors include the extent of snow cover and how quickly it thaws across the catchment served by the SO.

### Test 2: Heavy rainfall spills

“In the last 3 years (minimum) is the SO only spilling due to heavy rainfall?”

Yes = Indicates satisfactory; No = Substandard; N/A = EDM data not available

This assessment can be carried out using EDM recorded spills and comparing with the preceding rainfall. The assessment will need to be carried out against all spills. For SOs where you have less than 3 years EDM data, provide what is available.

Where discharges occur that are not because of heavy rainfall, the SO should be investigated to determine the cause of the discharge(s). The outcome of the investigation should be provided to us with the assessment submission.

### Test 3: 6 mm screening requirements

“Are the minimum 6mm screening requirements (described below) achieved?”

Yes = indicates satisfactory; No = substandard

All SOs should meet the following screening criteria and provide 6 mm solids separation. This should provide separation from the effluent, of a significant quantity of persistent material and faecal and organic solids, greater than 6 mm in any 2 dimensions. The discharge shall not be comminuted or macerated. All screenings shall be removed from the discharge.

The screen shall be adequately maintained and included within regular maintenance works. Where a mechanically cleaned screen is provided, a telemetry alarm system shall be installed and maintained, to give the operator immediate notification of a failure of the screen cleaning mechanism, unless otherwise agreed in writing by us. The operator must return the screen cleaning mechanism to normal operation as soon as reasonably practicable.

Flows up to and including the 1 in 5-year storm return period must be screened as a minimum. You must provide a bypass weir to prevent flooding due to flows greater than the 5-year screen design flow, or if the screen becomes fully blinded. Screens and chambers must not increase flood risk. The 5-year return period design should consider forecast development and make a suitable allowance for partial screen blinding during spills.

Where 6 mm solids separation is not already in place but the SOs are otherwise performing satisfactorily the SO can be upgraded at end of screen life or whenever other upgrade works are carried out. Where there is currently no screening in place the SO will need to upgrade within a timescale agreed with us.

#### Test 4: Settled storm storage (storm tank only)

“Is the storm overflow dealing with either:

- 3DWF is allowed in combination with storm storage which must settle out solids and have a minimum capacity of 68 litre per head served, or
- a storage equivalent of 2 hours at the maximum flow rate to the storm tanks?”

Yes = indicates satisfactory; No = substandard

The capacity and availability of storage needs to be assessed and compared with the requirements. This assessment should be based on the total population that could be served within the existing WwTW design horizons, so that the storm storage provision is in line with the [DWF](#) permitted volume.

#### Test 5: FPF equal to FFT (storm tank at a WwTW only)

“Is [FPF](#) equal to [FFT](#)?”

Yes = indicates satisfactory; No = substandard

This test will assess whether the WwTW is passing forward the correct amount of flow to treatment.

## Test 6: Passing forward Formula A (SPS and SOs only)

“Is the SO passing forward [Formula A](#)?”

Yes = indicates satisfactory; No = substandard

## Stage 2 – Permit Compliance

Where non-compliances are readily addressed through maintenance or quick wins and compliance restored then they are unlikely to contribute to a classification of unsatisfactory. If a maintenance issue is identified, we would expect these to be resolved within 12 months from the date they are identified.

### Test 1: Flow Passed Forward (FPF) permitted rate

“Is the SO meeting permitted [FPF](#)?”

Yes = indicates satisfactory; No = unsatisfactory; N/A = not specified in permit

### Test 2: Screen requirements

Assess all relevant screening permit conditions.

“Is the SO compliant with its permitted screen requirements?”

Yes = indicates satisfactory; No = unsatisfactory; N/A = not specified in permit

### Test 3: Storage requirements

“Is the SO compliant with its permitted storage requirements?”

Yes = indicates satisfactory; No = unsatisfactory; N/A = not specified in permit

The volume of storage specified in the permit must be available. Effluent returned from the storm tank to the continuation flow must be adequately managed to prevent loss of volume (for example by sediment build up or debris). Ensure efficient emptying of the storm tank. Storage capacity should not be unduly compromised from a failure to adequately empty the tank from a previous storm event.

### Test 4: Rainfall/snowmelt condition

“Is the SO compliant with the rainfall/snowmelt condition?”

The discharge shall only occur when, and only for as long as, the flow passed forward is equal to or greater than the overflow setting indicated due to rainfall and/or snowmelt

Yes = indicates satisfactory; No = unsatisfactory; N/A = not specified in permit

To comply with this permit condition:

- a discharge shall only occur when the FPF is equal to or greater than the overflow setting due to rainfall or snowmelt, and
- all offline storage (storm tanks):
  - must be fully utilised before a discharge can occur, and
  - should only fill when the FPF is equal to or greater than the overflow setting indicated due to rainfall and/or snow melt, and
  - should be emptied and its contents returned to the continuation flow as soon as reasonably practicable.

To ensure clarity on how we will regulate this permit condition, we will use the following principles:

- Using our definition of drain down time of a sewer catchment, we will consider any overflow operating after “[one dry day](#)” as non-compliant with this permit condition.
- For the purposes of UWWTR, we consider rainfall or snowmelt to be that which has fallen on hardstanding in the urban catchment (for example including roofs, pavements, roads, yards, drives). Run-off from indirectly drained areas such as fields and hills, and inflow from field drains, rivers and streams is not included.
- Significant infiltration of groundwater is excluded for the purposes of assessing the rainfall and/or snowmelt condition. UWWTR requires that infiltration through ground and soil shall be minimised in accordance with best technology knowledge not entailing excessive cost (BTKNEEC). Groundwater is ultimately due to rain or snow melt that has percolated through the soil, but the precipitation event may have occurred many days, weeks or even years previously. It is not appropriate to drain significant groundwater flows via a foul sewer and for this flow to be included in achieving the permitted FPF rate if the infiltration rate exceeds the infiltration rate used in the calculation of the permitted FPF.
- Infiltration encompasses groundwater, water entering a sewer, drain, or manhole chamber due to leaking joints, cracks, or faults or via purpose formed routes such as land drains and illegal connections.

## Stage 3 – environmental impact assessment

### Stage 3a – aesthetic impact assessment

There are two different methodologies to use to assess aesthetic impact: one for [discharges to rivers](#) and one for [discharges to TraC waters](#).

#### Discharges to rivers

Two site surveys and an assessment of incident and complaint records are required to complete an aesthetics impact assessment. This is due to the potential effects of bankside vegetation on access, visibility, and the potential for litter to collect. You should separate the two site surveys with a reasonable time span, by at least three months and ensure that one of the visits is when bankside vegetation is minimal (late autumn-spring). You should submit the data for both surveys, but the worst score from the two surveys must be used as the element score.

The assessment is split into six aesthetic elements, which are scored separately and then a combined score is used to categorise the aesthetic impact as per Table 2 below:

Total score of 6 elements	Aesthetic impact	Aesthetic impact classification
0	No impact	Indicates satisfactory
1 – 10	Very low	Indicates satisfactory
11 – 25	Low	Unsatisfactory
26 – 50	Moderate	Unsatisfactory
51 – 75	High	Unsatisfactory
Greater than 75	Severe	Unsatisfactory

**Table 2: Aesthetic impact and classification**

### Element 1: Pollution incidents

“Has the SO had any substantiated pollution incidents (category 1-3) that are attributed to hydraulic causes in the last 3 years (minimum)?”

Take the highest category and score this element as follows:

- If highest category of incident/s is Category 1, score 100
- If highest category of incident/s is Category 2, score 60
- If highest category of incident/s is Category 3, score 20

You should request information from us as part of this check. Pollution incidents with an environmental impact of category of 1, 2 or 3 are considered to have an adverse impact on the receiving water environment, so the SO would be classed as unsatisfactory.

Where an incident has been investigated and the root cause resolved these can be excluded from the assessment, but they should be made clear in the data submission as detailed in [Annex 2](#). These could include maintenance issues such as blockages and tree roots that have since been resolved.

### Element 2: Substantiated complaints

“How many substantiated public complaints (to the WaSC, local authority or NRW) has the SO had, in the last 3 years (minimum), which have been attributed to hydraulic causes?”

Calculate a score for this element as follows:

- 0 complaints, score 0
- 1-4, score 10
- 5-9, score 20
- 10-14, score 30
- >=15, score 40

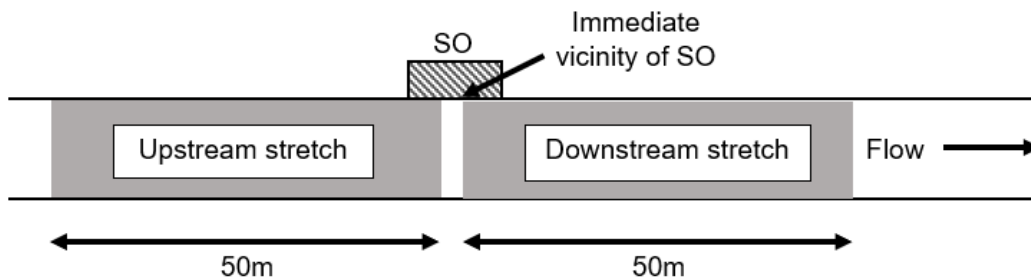


### Element 3: Sewage litter

Sewage derived litter includes hygiene products, contraceptives, toilet paper, faeces, wet wipes, and earbuds.

At each SO, estimates should be made of the number of identifiable items of sewage derived litter at three locations (see Figure 4: Diagram showing three locations to count sewage litter):

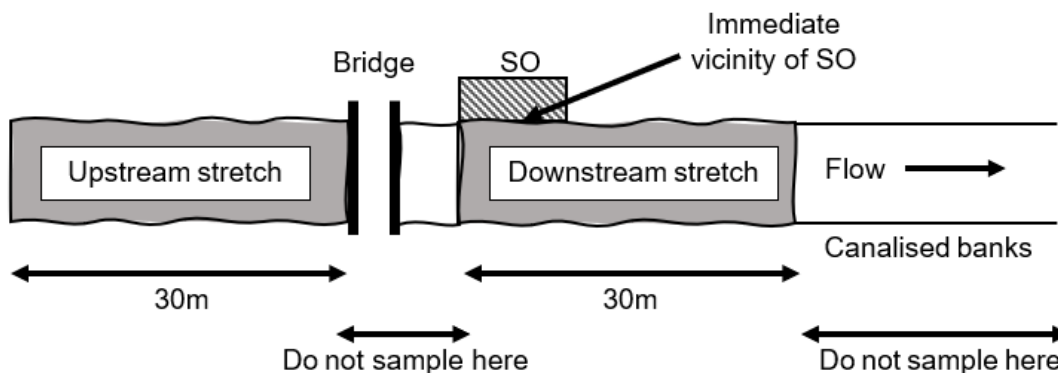
1. In the immediate vicinity of each SO
2. Along a stretch of river extending 50 m upstream of each SO or SO group
3. Along a stretch of river extending 50 m downstream of each SO or groups of SO.



**Figure 4: Diagram showing three locations to count sewage litter**

When estimating items in the immediate vicinity of the SO, include any on the external structure (screen, flap valve, apron etc) and, for SOs set back from the water's edge, on the bank immediately in front of the SO. Do not include items in the river immediately in front of the SO as these will be counted in the downstream assessment.

For the upstream and downstream stretches select, where possible, a 50 m stretch starting at the SO. These should be as similar as possible. If, for example, there is a bridge adjacent to the SO, choose a stretch starting beyond the bridge. If the nature of the banks or watercourse changes such that a relatively uniform 50 m stretch cannot be found, then shorter but equal length stretches should be selected. For example, if the river enters a canalised section 30 m downstream, then stretches extending 0-30 m downstream and 0-30 m upstream of the SO should be selected (see Figure 5).



**Figure 5: Diagram showing how to select upstream and downstream sewage litter sampling stretches to avoid non-uniform river sections**

If it is not possible to identify similar upstream and downstream stretches, then this part of the assessment should be abandoned.

To assess the number of sewage-derived litter items, walk the length of each stretch once, counting visible items. Wherever possible, assess the stretch by wading in the water (ensuring that safety regulations/guidelines are met). Include items in the water, on the bank or beach and on overhanging vegetation. When a large amount of sewage litter is present, the number of items can be estimated to save time.

Where it is foreseeable that litter may be stranded and visible in areas downstream of the notional 50 m survey area, the survey should be extended to include this area. This will be important where the amenity class increases downstream of the immediate 50 m reach. For example, where there is a park alongside the watercourse 300 m downstream of the outfall, then this would be included in the aesthetics assessment.

Where the upstream-downstream assessment of sewage derived litter has been made, the number of items of sewage derived litter attributed to the SO should be calculated by subtracting the upstream count from the downstream count. Compare this count with the immediate vicinity count and the higher of the two to determine the score as described below.

Where multiple SOs discharge into a stretch of river, sewage litter should be assessed upstream and downstream if the group of SOs and the highest 'immediate vicinity' count should then be compared with the difference between the upstream and downstream count and the highest of the count used to determine the score as described below.

Separately score the immediate vicinity count and the difference between the upstream and downstream count as follows:

- 0 items, score 0
- 1-10, score 5
- 11 – 25, score 10
- 26 – 50, score 15
- >50, score 20

Use the highest score for the element score.

#### **Element 4: Sewage fungus on outfall**

“Is sewage fungus present on the outfall?”

Present = score 5, absent = score 0

#### **Element 5: Sewage fungus on substrate**

“Is sewage fungus present on substrate downstream of mixing zone?”

Yes = score 25, No = calculate the mean % cover within mixing zone and score as follows:

- 0% mean cover, score 0
- >0% but <2%, score 5
- 2-10%, score 10
- 11-25, score 15
- 26-50, score 20
- >50, score 25

Where possible, assess the percentage cover of sewage fungus on the substrate (riverbed) at three locations, explained below and illustrated in Figure 6: Diagram showing where to sample stones to assess sewage fungus.

At each site, pick up ten cobble-sized stones (usually defined as >64 millimetre – <256 millimetre) and estimate the percentage cover of sewage fungus over the whole stone, including top and bottom to the nearest 10%. Ensure that the stones are taken from locations at each site that are similar in terms of flow, depth, and riverbed composition. Record the value for each stone separately.

### Three sites:

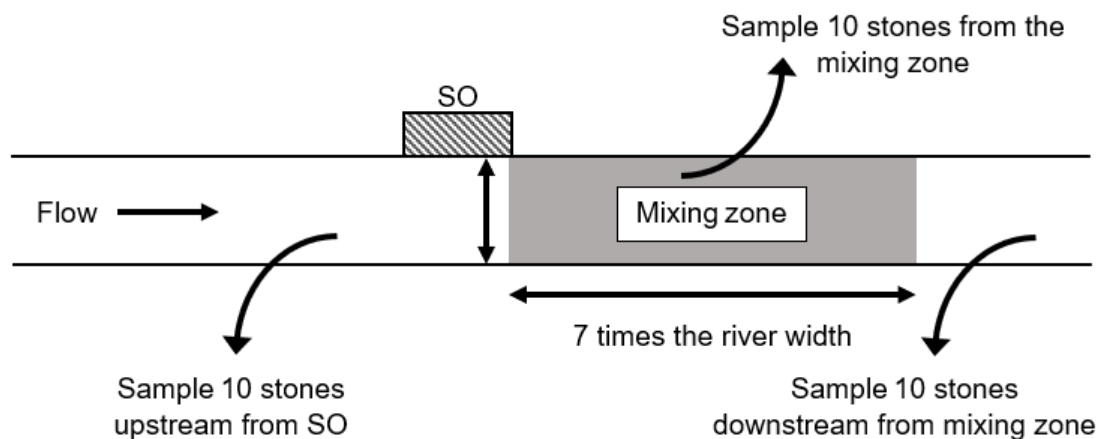
1. A suitable site within about 50 m upstream of the SO.

The percentage cover of sewage fungus upstream of the SO is not used for scoring purposes, but if present, the site should be investigated further to ascertain the cause.

2. Within the [mixing zone](#), immediately downstream of the SO and adjacent to the bank on which the SO is situated.
3. After the mixing zone downstream of the SO.

If sewage fungus is present assign a score of 25.

If it is not present downstream, then average the percentage cover for the ten stones assessed within the immediate mixing zone.



**Figure 6: Diagram showing where to sample stones to assess sewage fungus**

### Element 6: Amenity value

“What is the highest amenity value within 1 km downstream of the overflow?” Use judgement as appropriate.

Determine the amenity value and score using Table 3 below.

Moderate and high amenity sites will always trigger, as a minimum, a ‘very low impact’ aesthetic impact category (as per Table 3) even where there is no evidence of debris, public complaint, or pollution incidents. This is because two seasonal aesthetics surveys may not be sufficient to identify a problem. The SO will always pose a risk of aesthetic impact and complaint in areas of moderate to high amenity.

Amenity value	Examples	Score
High	<ul style="list-style-type: none"> <li>• Influences an area where bathing and water contact sport (immersion) is regularly practised (for example wind surfing, sports canoeing)</li> <li>• Receiving watercourse passes through formal public park</li> <li>• Formal picnic site</li> <li>• Designated shellfish waters</li> <li>• Designated bathing waters</li> <li>• Waters designated under the Conservation of Habitats and Species Regulations 2017 that are Sensitive Areas</li> </ul>	10
Moderate	<ul style="list-style-type: none"> <li>• Boating on the receiving water</li> <li>• Popular footpath/coastal path adjacent to waterbody</li> <li>• Recreation and contact sport (non-immersion) areas</li> <li>• A watercourse that passes through a housing development or frequently used town centre area (for example bridge, pedestrian area, shopping area)</li> <li>• It is linked, through substantiated “reasons for failure”, to an element of the Water Framework Directive classification being less than Good</li> </ul>	5
Low	<ul style="list-style-type: none"> <li>• Basic amenity use only</li> <li>• Casual riverside access on a limited or infrequent basis, such as a road bridge in a rural area, footpath adjacent to watercourse</li> </ul>	0
None	<ul style="list-style-type: none"> <li>• Seldom or never used for amenity purposes</li> <li>• Remote or inaccessible area</li> </ul>	0

**Table 3: Amenity value example criteria**

## Discharges to Transitional and Coastal (TraC) Waters

The methodology for assessing impact on aesthetics from discharges to TraC waters is in development – this guidance will be reissued as soon as its available.

## Stage 3b – invertebrate (biological) impact assessment

### Discharges to rivers

#### Introduction

Where it is possible to collect representative benthic invertebrate samples immediately upstream and downstream of the overflow, impact will be assessed using abundance weighted Whalley Hawkes Paisley Trigg (WHPT) indices with the River Invertebrate Classification Tool (RICT). This is the method used for WFD assessments ([River Assessment Method Benthic Invertebrate Fauna: Invertebrates \(General Degradation\) UKTAG, 2014](#)). The method is designed to detect impacts due to organic pollution and is also sensitive to toxic pollutants. The RICT was developed by the three UK environmental agencies to classify the ecological quality of rivers.

Invertebrate sampling is only appropriate in simple scenarios where there is a single storm overflow discharging to that reach of the river. You should not carry out an invertebrate assessment (instead go to [Stage 3c](#) and model the water quality impact) if any of the following apply:

- multiple outfalls in close proximity
- there are other sources of pollution which could account for differences in invertebrate quality between sampling sites upstream and downstream of the outfall
- if the SO discharges into a degraded urban watercourse where background / upstream invertebrate quality has a WFD status of Poor or Bad then this method should also not be used
- there are physical constraints that prevent sampling.

If none of the above apply you must carry out an invertebrate impact assessment.

A minimum of two separate seasonal samples are required – one taken in the spring (March – May), and one taken in the autumn (September – November). These should be consecutive but could either be the spring and autumn of the same calendar year or autumn and the following spring. You should also visit in the summer to record the environmental variables (habitat information), but if this is not possible, then you may be able to use 'Model 44' in RICT which allows you to input the NGR grid reference and it will use GIS to assign site base data for you.

#### Methodology

##### 1. Record observed NTAXA and calculate ASPT scores

The number of abundance weighted WHPT scoring families found during sampling (WHPT NTAXA), and their individual abundance weighted scores for sensitivity to organic pollution are recorded. An average score per taxon (ASPT) for the sample is then calculated.

##### 2. Predict scores if site undisturbed (or reference scores) using RICT

The observed abundance weighted WHPT NTAXA and ASPT values are compared to the values that might be expected under undisturbed or reference conditions for that site.

These undisturbed or reference scores are predicted by statistical models in the RICT software.

### 3. Calculate Environmental Quality Ratio using the observed and predicted scores

The observed values of WHPT ASPT and WHPT NTAXA are compared to the predicted values to generate an Environmental Quality Ratio (EQR). EQRs close to 1.0 indicate that invertebrate communities are close to their natural state. Use Table 4: EQR ratios for different WFD invertebrate status classes to assign an invertebrate status class.

<b>EQR values for WHPT NTAXA</b>	<b>EQR values for WHPT ASPT</b>	<b>Invertebrate status class</b>
>=0.8	>=0.97	High
>=0.68	>=0.86	Good
>=0.56	>=0.72	Moderate
>=0.47	>=0.53	Poor
<0.47	<0.53	Bad

**Table 4: EQR ratios for different WFD invertebrate status classes**

### 4. Calculate a mean EQR for the two seasons (spring and autumn)

A mean EQR is then calculated for the two seasons.

### 5. Estimate confidence of status class difference using RICT Compare Module

The RICT uses Monte Carlo processes to simulate uncertainty in observed and expected EQRs due to factors such as sampling variation, error in measuring environmental variables, and laboratory processing errors (bias). The software typically uses 10,000 'shots' to build up a distribution of potential EQRs to estimate confidence of status class.

Use the RICT Compare Module's 'Compare – At a Glance' report to compare the quality of the upstream and downstream sampling sites. The report shows the percentage number of simulations where the downstream sample is in a different status class to the upstream sample for both WHPT NTAXA and ASPT. Use the scoring system in Table 5 and Table 6 below for both indices (WHPT NTAXA & ASPT):

Percentage of simulations the downstream sample is one or more classes worse than upstream (%)	Score	Multiply score by no. of classes the downstream sample is worse than upstream
1-4	1	Yes
5-9	2	Yes
10-29	4	Yes
30-49	6	Yes
50-70	8	Yes
71-90	10	Yes
>90	12	Yes

**Table 5: Invertebrate impact scoring for WHPT NTAXA & ASPT**

Total score	Invertebrate impact	Overall SO classification
1	No impact	Indicates satisfactory
2 – 3	Very low	Indicates satisfactory
4 – 5	Low	Unsatisfactory
6 – 7	Moderate	Unsatisfactory
8 – 9	High	Unsatisfactory
10 – 11	Very high	Unsatisfactory
12 – 15	Severe	Unsatisfactory
16 – 19	Very severe	Unsatisfactory
20 or more	Extremely severe	Unsatisfactory

**Table 6: Invertebrate impact for WHPT NTAXA & ASPT**

#### 6. Calculate overall classification

As shown in Table 6, if there is evidence of at least a 'Low impact' on invertebrates, the SO will be classified as unsatisfactory.

Overall classification is based on the worst status class assigned for the multi – season mean WHPT NTAXA and WHPT ASPT.

The worst score for WHPT NTAXA and ASPT should be used to assign impact. The scoring process will be repeated for each of the individual spring and autumn samples, and the overall mean of the seasons to produce a short-term and long-term impact assessment (Table 7).



Type	Description	Impact
Short-term	Worst single season impact result for WHPT NTAXA and ASPT	No impact – extremely severe
Long-term	Worst of WHPT NTAXA and ASPT for the overall multi season (spring & autumn impact)	No impact – extremely severe

**Table 7: Short-term and long-term impact assessment**

### 7. Check existing data

Where available, existing biological monitoring data for fish and invertebrates used for WFD classification may be used to provide additional evidence that the overflow is not causing an environmental impact. For example, where representative sampling points are present downstream of the overflow, in close proximity, or in locations likely to be sensitive to discharges from the overflow, and these consistently record good or high status, then this may be used as evidence to support no impact classifications.

## Discharges to Transitional and Coastal Waters (TraC)

The methodology for assessing impact on invertebrates (biology) from TraC discharges is in development – this guidance will be reissued as soon as its available.

## Stage 3c – Water quality (WQ) impact assessment

### Introduction

You do not need to complete a WQ impact assessment if you have carried out an invertebrate impact assessment as specified in [Stage 3b](#).

If you wish to carry out a WQ impact assessment you can submit this with the classification assessment evidence, but the invertebrate impact assessment will take precedence.

If it was not possible to carry out an invertebrate impact assessment for one of the reasons specified in Stage 3b, you must carry out the water quality impact assessment methodology as detailed below.

This stage assesses whether the SO is likely to cause an environmental impact using WQ modelling.

You should explain the risk-based approach to the level of modelling you have used to determine the impact.

### Discharges to rivers

#### Carry out initial screening

Determine if the overflow is likely to cause water quality issues and jeopardise water quality standards, by checking the following:

“Does the SO meet all three dilution criteria below?”

- the SO must pass forward a retained flow of Formula A over the full duration of spills
- the dilution in the receiving water must be >8:1 (Q95 river flow: sewer DWF)
- there is no potential for interaction with other discharges”

Yes = assign a water quality classification of ‘very low’ and no need to use a water quality model

No = water quality modelling is required to assess the impact of the overflow

### WQ assessment overview

The assessment should quantify the impact of the storm overflow on either:

- the duration of 99 percentile exceedance, or
- 99 percentile quality for total ammonia and BOD, and the number of exceedances of the fundamental intermittent standards (FIS) for dissolved oxygen and un-ionised ammonia.

This should be undertaken as a relative assessment by comparing the impact of the urban drainage system on downstream river quality with and without the discharge from the SO.

New models are not required in all cases. Where they are 'fit for purpose', existing sewer and river impact models from recent drainage planning or UPM studies should be used.

## Model complexity levels

Although a verified sewer model is required to assess impact, it is not expected that complex sewer quality and dynamic river quality modelling is carried out in all cases. The [Urban Pollution Management \(UPM\) manual version 3.1](#) (Foundation for Water Research, 2018) provides guidance on modelling the impact of storm discharges.

The level of complexity involved depends on the complexity of the problem and the potential cost of any solutions. A complex problem, for example where many storm overflows discharge into a river channel which contains structures such as weirs or sluices likely to affect quality, will need more detailed models and data collection. In contrast, simplified impact approaches will be sufficient for simple scenarios, for example where a single or very small number of overflows discharge into a simple river reach and dilution levels are relatively high.

There are four levels of complexity:

1. Level 1 is the simplest form of impact assessment. Time series outputs from the verified sewer model are mixed with random picks of upstream river flow and quality selected from statistical distributions. Default or sampled values for storm sewage BOD and total ammonia concentrations can be used and applied as an event mean concentration. The river reach is simplified to a trapezoidal channel. Hydraulic equations are used to estimate the depth and velocity of the mixed flow of river and storm sewage. A simplified water quality model usually representing the main oxygen demand processes (BOD decay and nitrification) and re-aeration is used to predict levels of dissolved oxygen and un-ionised ammonia at the end of the reach. Checks against 99 percentile standards and initial un-ionised ammonia can be made at the point of mixing.
2. Level 2 is similar to level 1. However, instead of a stochastic approach to representing upstream river flow, a river flow time series is used. This allows the flow, and therefore dilution available in the river at the time of a spill, to be better represented. As in level 1, simplified river hydraulics and water quality are still used to predict the time of travel for pollutants along the reach, and the depth and velocity of flow used to predict re-aeration rates.
3. Level 3 studies use calibrated flow routing models to predict time of travel along longer and more complex water bodies more accurately. This allows better representation of advective pollutant transport. More complex water quality simulation can be used with the model calibrated for the key parameters – BOD, ammonia, and dissolved oxygen – using observed event sampling and water quality sonde data. Storm sewage quality is represented using observed sampling data or calibrated sewer quality models.

4. Level 4 is the most complex form of impact model. Calibrated hydrodynamic river models used to simulate the varying depth and velocity of flow within the watercourse. Advection and dispersion is calibrated against observed data (e.g., dye tracing). Various levels of water quality simulation are possible with calibration and verification against event sampling and water quality sonde data.

For all levels, a long (minimum 10 year) historic or synthetic rainfall time series representative of the catchment is required.

Further on potential modelling approaches and levels of complexity is provided below.

## Potential modelling approaches and the four levels of complexity

### Urban drainage inputs

- SO flow:
  - Levels 1-4: verified sewer model
- Storm sewage quality:
  - Levels 1 & 2: Event mean concentrations using default values (e.g., Dempsey, 2005) or sampled values
  - Levels 3 & 4: Sampled values or calibrated sewer quality model
- WwTW flow:
  - Level 1: Statistical distribution from MCertified data
  - Levels 2-4: Predicted flow time series from verified sewer model
- WwTW quality:
  - Levels 1-4: Statistical distribution from sampled effluent quality

### Boundary river conditions

- Upstream river flow
  - Level 1: Statistical distribution from gauged data or ungauged estimate
  - Levels 2-4: 10-year historic flow time series from EA gauging station or calibrated rainfall runoff model
- Upstream river quality
  - Levels 1-4: Statistical distribution from EA routine samples

### River model

- Hydraulic
  - Levels 1&2: Simplified channel, steady & uniform
  - Level 3: Calibrated flow routing model
  - Level 4: Calibrated hydro-dynamic model
- Water quality
  - Levels 1&2: Simplified WQ processes & re-aeration using default values for rate coefficients
  - Level 3: Advective pollutant transport, WQ simulation calibrated from event sampling & sonde data
  - Level 4: Calibrated advection – dispersion model, WQ simulation calibrated from event sampling & sonde data

### Rainfall series

- Levels 1-4: 10-year representative historic or synthetic time series.

## Impact scoring

The worst water quality score from the two types of assessment (99 percentile quality and FIS) should be used as follows:

### (1) 99 percentile quality

Two approaches are available depending on the type of modelling tool used:

#### i. Estimate of 99 percentile

Select the relevant 99 percentile BOD and total ammonia standards for the receiving water according to WFD water body typology. These standards can be obtained from the [Urban Pollution Management \(UPM\) manual version 3.1](#) (Foundation for Water Research, 2018). As an example, Table 8 below shows the 99 percentile classes for water body types 3, 5 and 7. Where there is a drop in 99 percentile status class between the modelled upstream and downstream assessment points assign a score of 45.

WFD status for water body types 3, 5 and 7	99 percentile for biological oxygen demand (BOD) (mg/l)	99 percentile for total ammonia (mg/l)
High	9.0	0.7
Good	11.0	1.5
Moderate	14.0	2.6
Poor	19.0	6.0

**Table 8: 99 percentile standards for WFD water body types 3, 5 and 7**

Where the overflow does not cause a drop in status class but causes a degree of within class deterioration, assign a score according to the percentage within class deterioration as shown in Table 9 below. Use the worst score returned for the BOD and total ammonia assessments.

Percentage within class deterioration	Score
1 – 10	5
11 – 25	15
26 – 50	25
51 – 75	35
>75	45

**Table 9: 99th percentile within class deterioration scores**

**ii. Duration of exceedance**

Where modelling tools are used which do not calculate a 99th percentile, but instead estimate the duration for which a 99th percentile standard is exceeded, then use the scoring system in Table 10 below in conjunction with the 99th percentile BOD and total ammonia standards for good status. The impact duration with the worst score should be used.

Impact duration	Allowable exceedances (number/year)	Score
1 hour	87.6	+ 0.5 points for every 1.0/year increase in exceedances
6 hours	14.6	+ 3.0 points for every 1.0/year increase in exceedances
24 hours	3.65	+ 12.0 points for every 1.0/year increase in exceedances

**Table 10: Scoring system for duration / number of 99th percentile exceedances**

**(2) Fundamental intermittent standards (FIS)**

Select the relevant fundamental intermittent standards for the receiving water according to fishery type (sustainable cyprinid, sustainable salmonid, and salmonid spawning). The FIS for dissolved oxygen and un-ionised ammonia are available in the [Urban Pollution Management \(UPM\) manual version 3.1](#) (Foundation for Water Research, 2018).

Compare the frequency of FIS exceedances in the receiving water with and without the storm discharge. For example, the FIS for dissolved oxygen in sustainable cyprinid waters (correction factors are also required) are shown in Table 11 below.

Frequency (return period)	DO concentration (mg/l) 1 hour	DO concentration (mg/l) 6 hours	DO concentration (mg/l) 24 hours
1 month	4.0	5.0	5.5
3 months	3.5	4.5	5.0
1 year	3.0	4.0	4.5

**Table 11: Fundamental intermittent dissolved oxygen (DO) standards for sustainable cyprinid waters**

Use the scoring system in Table 12 where the discharge causes a deterioration (increase) in the frequency of allowable exceedances:

Frequency (return period)	Allowable exceedances (number/year)	Score
1 month	12	+ 1.5 points for every 0.5/yr increase in exceedances
3 months	4	+ 4 points for every 0.5/yr increase in exceedances
1 year	1	+ 6 points for every 0.2/yr increase in exceedances

**Table 12: Scoring system for increases in FIS exceedances for un-ionised ammonia and dissolved oxygen**

### Determine SO classification for WQ impact

The worst score obtained from the FIS and 99 percentile assessments should be used for the water quality impact classification set out in Table 13: Water quality impact and classification below.

Water quality score	Water quality impact	Overall SO classification
0 – 5	No impact	Indicates satisfactory
6 – 9	Very low	Indicates satisfactory
10 – 19	Low	Unsatisfactory
20 – 29	Moderate	Unsatisfactory
30 – 39	High	Unsatisfactory
40 or more	Severe	Unsatisfactory

**Table 13: Water quality impact and classification**

A score of 'Low impact' or worse results in the SO being classified as unsatisfactory.

### Discharges to Transitional and Coastal Waters

The methodology for assessing the impact on water quality from discharges to TraC waters is in development – this guidance will be reissued as soon as its available.

## Stage 4 – Other evidence

The WaSC should consider any other available sources of known information. If a SO causes an environmental impact which has not been evidenced in any other stage of the classification assessment, the information should be summarised in the submission to us.

“Is there any other evidence that demonstrates that the SO is having an environmental impact, alone or in combination with other discharges, on the following protected sites (but not limited to):

- a deterioration in biological or chemical status of the receiving water (Water Framework Directive) or a water body downstream
- a failure in bathing quality standards for a designated bathing water
- a failure in shellfish quality standards for designated shellfish water
- unfavourable conservation status of protected site features (including a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, or Site of Special Scientific Interest (SSSI))
- an impact to an UWWTR sensitive area designation
- an impact to a drinking water protected area
- groundwater Source Protection Zones (SPZ)”?

Yes = provide a summary in your submission; No = confirm no other evidence known in submission

“Is any other information available for the SO (that has not already been used in Stages 1-3) that evidences environmental impact?”

Yes = provide a summary in your submission; No = confirm no other evidence known in submission

Other information could include, but is not limited to:

- Historic surveys of the SO or receiving water
- Sewer network model results that are likely to have been generated during the production of Drainage and Wastewater Management Plans (DWMPs) or other programmes that could be utilised to assist in the classification of SOs
- Other data that may have been gathered and assessed during the DWMP or other programmes, including but not limited to as-built drawings and/or surveys
- Any known intermittent issues impacting on chemical or biological water quality.



# Annex 2 – data collection and submission requirements

## General information on SO

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
1	Permit reference (or unique identifier if unpermitted)	No EPR or NPS prefix, no variation number suffix	Must match permit reference on public register	Submit
2	Site name		If permitted, must match public register	Submit
3	WaSC asset ID			Submit
4	Sewerage catchment			Submit
5	Storm discharge asset type	SO on sewer network / Storm discharge at pumping station / Inlet SO at WwTW / Discharge from storm tank at WwTW / Other storm discharge asset type (specify)	Same as used on EDM returns	Submit
6	NGR of SO location	Use 12 figure grid ref, for example SN5110064321		Submit
7	NGR of discharge point	Use 12 figure grid ref, for example SN5110064321		Submit
8	Receiving water category	River / TraC / Other (specify)		Submit
9	Permitted BW / SFW trigger no.	BW## / SFW## / N/A	e.g., BW5, SFW14	Submit
10	Has SO had a SOAF assessment	Yes / No		Submit
11	Any confirmed NEP schemes for this SO	Provide planned start and end dates with a short description of the scheme		
12	Representative rain gauge/s identification		Include station name and number	Submit
13	Approx river width (m)			Submit
14	Photos of SO, outfall and sampling locations	Must be date and time stamped		AOR
15	Outfall type	Bankside / Short sea outfall / Long sea outfall	Also state if permanently submerged	Submit
16	Outfall condition	Good / Damaged / Overgrown / Other (specify)		Submit

17	Does SO discharge directly or indirectly into a SAC catchment?	Yes / No		Submit
18	Name of receiving WFD waterbody			Submit
19	Waterbody ID of receiving waterbody			Submit

## Event Duration Monitoring (EDM) data

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
20	EDM annual datasets used for assessment	State years		Submit
21	Excluded annual EDM datasets	State years	If any in last 3 years have been excluded due to maintenance issues that causes high spills	Submit
22	Reason for dataset exclusion	Free text		Submit
23	Any known issues with EDM data accuracy or operability	Yes / No	At least 90% monitor operability expected	Submit

## Stage 1: Minimum design standards

### Test 1: Dry day discharges

No.	Data field	Data/information validation	Submit / AOR?
24	Does the SO have any <u>dry day discharges</u> in the last 3 years (minimum) that are due to hydraulic reasons?	Yes / No / N/A	Submit
25	Analysis report	Demonstrate how the dry day definitions have been applied to the rainfall and EDM data, including deviations from overarching methodologies that you may refer to. Include description of assessment method and data sources. Provide a summary representation of outputs, using graphs as appropriate	Submit
26	Classification	Unsatisfactory / Indicates satisfactory	Submit

## Test 2: Heavy rainfall spills

No.	Data field	Data/information validation	Submit / AOR?
27	In the last 3 years (minimum) is the SO only spilling due to heavy rainfall?	Yes / No / N/A	Submit
28	Analysis report	Demonstrate how the heavy rainfall definition have been applied to the rainfall and EDM data, including deviations from overarching methodologies that you may refer to. Include description of assessment method and data sources. Provide a summary representation of outputs, using graphs as appropriate	Submit
29	Classification	Substandard / Indicates satisfactory	Submit

## Test 3: 6 mm screening requirements

No.	Data field	Data/information validation	Submit / AOR?
30	Are the minimum 6mm screening requirements achieved?	Yes / No	Submit
31	Type of screen present	4 mm 1D, 4 mm 2D, 6 mm 1D, 6 mm 2D, 10 mm 1D, 10 mm 2D, other, none	Submit
32	Classification	Substandard / Indicates satisfactory	Submit

## Test 4: Settled storm storage (storm tank only)

No.	Data field	Data/information validation	Submit / AOR?
33	What can the settled storm storage deal with?	At least 3DWF / At least 2hrs equivalent storage / Neither	Submit
34	Classification	Substandard / Indicates satisfactory	Submit

## Test 5: FPF equal to FFT (storm tank at a WwTW only)

No.	Data field	Data/information validation	Submit / AOR?
35	Is FPF equal to FFT?	Yes / No	Submit
36	Classification	Substandard / Indicates satisfactory	Submit

## Test 6: Passing forward Formula A (SPS and SOs only)

No.	Data field	Data/information validation	Submit / AOR?
37	Is the SO passing forward Formula A?	Yes / No	Submit

38	Formula A (l/s)		Submit
39	Classification	Substandard / Indicates satisfactory	Submit

## Stage 2: Permit compliance

### Test 1: Flow Passed Forward (FPF) permitted rate

No.	Data field	Data/information validation	Submit/AOR?
40	Is the SO meeting permitted FPF?	Yes / No / N/A	
41	Permitted FPF (l/s)	Value or N/A	Submit
42	Actual FPF (l/s)		Submit
43	How is actual measured	Observed / Modelled	Submit
44	Classification	Unsatisfactory / Indicates satisfactory	Submit

### Test 2: Is the SO compliant with its permitted screen requirements?

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
45	Is the SO compliant with its permitted screen requirements?	Yes / No / N/A		
46	Permitted screen requirement	4 mm 1D, 4 mm 2D, 6 mm 1D, 6 mm 2D, 10 mm 1D, 10 mm 2D, other, N/A		Submit
47	Screen present	4 mm 1D, 4 mm 2D, 6 mm 1D, 6 mm 2D, 10 mm 1D, 10 mm 2D, other, none		Submit
48	Screen replacement date	End of Life (EOL) / Upgrade required	Upgrade date needs to be agreed with us	Submit
49	Classification	Unsatisfactory / Indicates satisfactory		Submit

### Test 3: Storage requirements

No.	Data field	Data/information validation	Submit / AOR?
50	Permitted storage requirement (m <sup>3</sup> )	m <sup>3</sup> or N/A	Submit
51	Storage available (m <sup>3</sup> )	m <sup>3</sup>	Submit
52	Following cessation of rainfall how is storm tank contents returned to FFT?	Auto / Manual / None	Submit
53	Classification	Unsatisfactory / Indicates satisfactory	Submit

## Test 4: Rainfall/snowmelt condition

No.	Data field	Data/information validation	Submit / AOR?
54	Is the SO compliant with the rainfall/ snowmelt condition?	Yes / No / N/A	Submit
55	If no, give reason	Free text	Submit
56	Classification	Unsatisfactory / Indicates satisfactory	Submit

## Stage 3a: Aesthetics assessment

### Site visit information

No.	Data field	Data/information validation	Submit / AOR?
57	Date of Spring assessment	DDMMYY	Submit
58	Date of Autumn/Winter assessment	DDMMYY	Submit
59	Discharging at time of visit?	Yes / No	AOR
60	Discharge colour/quality	Clear / Grey / Other (specify)	AOR
61	Weather at time of visit	Free text	AOR
62	Weather in last 24 hours	Free text	AOR
63	Are any of the following present: oil sheen, silt or sediment at outfall or downstream substrate, odour?	Free text	AOR
64	Is there a visible plume?	Yes / No	Submit

## Element 1: Pollution incidents (hydraulic related)

No.	Data field	Data/information validation	Submit / AOR?
65	WIRS reference number/s		Submit
66	WIRS reference number/s excluded as due to maintenance issues		AOR
67	Highest environmental impact category of hydraulic WIRS	Cat 1 / 2 / 3 / 4 / None	Submit
68	Element score	100 / 60 / 20 / 0	Submit

## Element 2: Substantiated complaints

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
69	No. received by WaSC		Include dates, details, references	AOR
70	No. received by Local Authority		Include dates, details, references	AOR
71	No. received by NRW		Include dates, details, references	AOR
72	Total no. of complaints			Submit
73	Element score	0 / 10 / 20 / 30 / 40		Submit

### Element 3: Sewage litter

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
74	If assessment is for a group of SOs, provide all permit/unpermitted unique refs	Permit refs or N/A-single asset assessed		Submit
75	Stretch starts how many metres u/s of outfall (m)			AOR
76	Length of stretch (m)			AOR
77	No. of items of sewage litter upstream			Submit
78	Stretch starts how many metres d/s of outfall (m)			AOR
79	Length of stretch (m)			AOR
80	No. of items of sewage litter downstream			Submit
81	Difference between u/s and d/s count			Submit
82	Score for u/s d/s difference	0 / 5 / 10 / 15 / 20		Submit
83	No. of items of sewage litter in immediate vicinity & on structure			Submit
84	Score for immediate vicinity	0 / 5 / 10 / 15 / 20		Submit
85	Element score	0 / 5 / 10 / 15 / 20	Use worst score between u/s d/s difference & immediate vicinity	Submit

### Element 4: Sewage fungus on outfall

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
86	Is there fungus on outfall	Present / Absent		Submit
87	Element score	0/5	0 for absent, 5 for present	Submit

### Element 5: Sewage fungus on substrate

#### Upstream of SO

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
88	% Coverage on 10 stones u/s of SO	%	Not used for scoring, but should investigate cause	AOR
89	Average % coverage on u/s substrate	%		Submit

## Within mixing zone 0-50 m downstream of SO

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
90	% Coverage on 10 stones d/s of SO	%	To nearest 10%	AOR
91	Average % coverage on d/s substrate	%		Submit
92	Score	0 / 5 / 10 / 15 / 20 / 25		Submit

## Beyond mixing zone

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
93	% Coverage on 10 stones d/s of SO	%	To nearest 10%	AOR
94	Average % coverage on d/s substrate	%		Submit
95	Score	0 / 25	0 = absent, 25 = present	Submit
96	Element score	0 / 5 / 10 / 15 / 20 / 25	Use highest of two scores (92 and 95)	Submit

## Element 6: Amenity value

No.	Data field	Data/information validation	Submit / AOR?
97	Amenity category	High / Medium / Low / None	Submit
98	Reason for category	Free text	Submit
99	Element score	0 / 5 / 10	Submit

## Total aesthetics impact

No.	Data field	Data/information validation	Submit / AOR?
100	Total of 6 element scores		Submit
101	Aesthetic impact	None / Very low / Low / Moderate / High / Severe	Submit
102	Classification	Satisfactory / Unsatisfactory	Submit

## Stage 3b: Invertebrate (biological) assessment

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
103	Assessment data and outputs		Includes WHPT indices, EQR, Sims	AOR
104	Worst short-term invertebrate impact (spring)	No impact / Very low / Low / Moderate / High / Very high / Severe / Very severe / Extremely severe		Submit

105	Worst short-term invertebrate impact (autumn)	No impact / Very low / Low / Moderate / High / Very high / Severe / Very severe / Extremely severe		Submit
106	Worst long-term invertebrate impact (spring and autumn)	No impact / Very low / Low / Moderate / High / Very high / Severe / Very severe / Extremely severe		Submit
107	Overall invertebrate classification	Unsatisfactory / Indicates satisfactory	Use worst out of three above	Submit

### Stage 3c: WQ impact assessment

No.	Data field	Data/information validation	Additional guidance	Submit / AOR?
108	Does the SO meet all three dilution criteria?	Yes / No	Yes = Very low impact	Submit
109	If no, provide a summary report of WQ modelling undertaken and conclusions			Submit
110	Which parameters have failed			Submit
111	Overall WQ impact	No impact / Very low / Low / Moderate / High / Severe		Submit
112	Classification	Unsatisfactory / Indicates satisfactory		Submit

### Stage 4: Other evidence

No.	Data field	Data/information validation	Submit / AOR?
113	Is there any other evidence that demonstrates that the SO is having an environmental impact, alone or in combination with other discharges, on any protected sites?	Yes / No	Submit
114	If yes, provide a summary report	Free text	Submit
115	Is any other information available for the SO (that has not already been used in Stages 1-3) that evidences environmental impact?	Yes / No	Submit
116	If yes, provide a summary report	Free text	Submit
117	Classification	Unsatisfactory / Indicates satisfactory	Submit

### Overall proposed classification

No.	Data field	Data/information validation	Submit/AOR?
118	Overall proposed classification	Unsatisfactory / Substandard / Satisfactory	Submit
119	Submission date	Date submitted	Submit



## Abbreviations

AOR	Available on request
DWMP	Drainage and wastewater management plans
EDM	Event duration monitoring
EOL	End of life
FFT	Flow to full treatment
FPF	Flow passed forward
HRA	Habitat Regulations Assessment
LIL	Last in line
MCERTS	Monitoring certificate scheme
RFI	Request for information
SAC	Special Areas of Conservation
SO	Storm overflow
SOAF	Storm overflow assessment framework
SPA	Special Protection Areas
SPS	Sewage pumping station
SSSI	Site of Special Scientific Interest
TraC	Transitional and coastal waters
TSR	Timeseries rainfall
UPM	Urban Pollution Manual
UWWTR	Urban Wastewater Treatment Regulations
WaSC	Water and sewerage company
WFD	Water Framework Directive
WIRS	Wales Incident Recording System
WWTW	Wastewater treatment works

Mae cyfyngiadau ar y ddogfen hon



Llywodraeth Cymru  
Welsh Government

Llyr Gruffydd MS  
Climate Change, Environment, and Infrastructure Committee  
Senedd Cymru  
Cardiff Bay  
Cardiff  
CF99 1SN  
SeneddClimate@senedd.wales

25 October 2023

Dear Llyr,

Further to the Minister for Climate Change's letter of 1 September, which responded to the Climate Change, Environment and Infrastructure Committee Report on the Environment (Air Quality and Soundscapes) (Wales) Bill, I am writing to update you on recommendations 26 & 27.

The Summary of Responses document to our consultation entitled 'Reducing Emissions from Domestic Solid Fuel Burning' has been published and can be found [here](#).

The responses to the consultation highlighted positive support for our policy ambition to restrict the sale of solid fuels and improve air quality in Wales. I have instructed officials to gather further evidence, undertake an impact assessment and develop policy with a view to regulations being made under section 87 of the Environment Act 1995 to come into force in Autumn 2025.

It is likely that we will have a transition period associated with any solid fuel bans or restrictions to allow suppliers to deplete existing stocks. Alongside development of the regulations, we will collaborate with public bodies and industry to produce communication materials which will inform businesses and public bodies about the new rules. Many respondents highlighted that communication would be key to a successful transition.

I will be looking at how we can support both local authorities to enforce the regulations, and households in the transition away from a reliance on solid fuels or a desire for aesthetic burning. This approach is supported in the draft [Heat Strategy for Wales](#) which outlines our ambitions to transition to low carbon heating.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 118  
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

For ease of reference, a table listing the responses to each question within the consultation is in the Annex below.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lee', is centered on a light gray rectangular background.

**Lee Waters AS/MS**

Y Dirprwy Weinidog Newid Hinsawdd  
Deputy Minister for Climate Change



## Reducing Emissions from Domestic Burning of Solid Fuels Consultation Table of Responses

Question	Response
1. Do you agree that we should phase out the use of bituminous/traditional house coal for domestic/residential burning?	We will bring in legislation to ban the sale of bituminous house coal in domestic settings.
2. What do you consider is a reasonable transition period to allow industry and householders to use up existing stock?	We aim to provide a transition period and will agree the duration during the development of the regulations.
3. In the event of a ban, we would need to ensure that bituminous/traditional house coal products are prevented from being marketed as “smokeless” or “low smoke” fuels?	We will explore the practicalities of adopting the Ready to Burn scheme, or something similar, in Wales.
4. In order to comply with any proposal to phase out bituminous/traditional house coal what adjustment, if any, would your business need to make?	We will take on board the information provided in response to the question.
5. What support might you require to make these adjustments?	We will engage further with coal suppliers across Wales to better understand the support required. This includes understanding the implications of different approaches for disseminating information to individual households on cost-effective and less polluting alternatives to coal.
6. Do you agree that we are taking appropriate steps in view of the need to reduce our carbon emissions?	The domestic combustion sector is not the largest emitter of CO <sub>2</sub> but addressing these emissions is one of a wide range of measures we are putting in place to achieve our statutory climate targets set by the Senedd in 2021.
7. If you have any further comments or suggestions on this section, please provide them here.	We will take key themes from this response into account in the development of the regulations.
8. We are considering a minimum volume for the sale of wet wood to householders. We are proposing that this is set at 2m <sup>3</sup> , but we are inviting your views on this point. Please indicate what limit you think this should be set at.	We will be placing a limit on the sales of wet wood in Wales and the volume will be determined during the development of the regulations. We will take the themes from this question into account.
9. Do you think that suppliers and retailers should be given a transition period to sell existing stocks of wet wood?	We aim to provide a transition period and will agree the duration during the development of the regulations.
10. If so, how long should any transition period be?	We will involve work closely with the wood supply industry during any transition period.

<p>11. Do you agree that wood fuel suppliers should be required to be members of a certification scheme that provides assurance (via testing and auditing) that the wood is of a moisture content of 20% or less?</p>	<p>We will liaise with Defra about the possibility of aligning with the Ready to Burn scheme.</p> <p>We will develop a campaign to accompany any regulations.</p>
<p>12. Do you agree that retailers selling wood should be legally required to store the wood in such a way that it will maintain at least the stated moisture content?</p>	<p>Any scheme certifying wood sales would require some form of legal enforcement and we will clarify to whom the rules apply when aligning to any certification scheme.</p> <p>We will engage further with relevant stakeholders during the development of the regulations.</p>
<p>13. Alternatively, would you welcome a campaign to provide guidance to both retailers and households on how best to store both wet and dry wood, and how long to store to ensure it is seasoned properly?</p>	<p>We intend to collaborate with all appropriate stakeholders and delivery partners to develop an information campaign, engaging with suppliers, retailers and households.</p>
<p>14. Do you feel Welsh Government should treat kiln dried wood differently to naturally dried wood or treat both types equally?</p>	<p>We will take the responses into consideration with Defra and the other administrations to establish consensus and a way forward.</p>
<p>15. Should the sale of wet wood to domestic properties be treated differently in rural as opposed to urban settings?</p>	<p>We will apply a consistent approach throughout Wales.</p>
<p>16. If you are a supplier/retailer, how would these proposals affect your business?</p>	<p>We will engage further with relevant stakeholders to ensure any regulation of the sale of wood is managed in a way that is sensitive to the needs of business, whilst preventing potential harm caused by the storing and burning wood inappropriately.</p>
<p>17. What support might you require to make these adjustments?</p>	<p>See response to question 16.</p>
<p>18. If you have any further comments or suggestions on this section, please provide them here.</p>	<p>We acknowledge the need to raise awareness of the impacts of solid fuel burning, particularly within urban communities. We will develop communications to support householders in their transition to cleaner fuels.</p>
<p>19. Do you agree that we should introduce a standard for all manufactured mineral solid fuels which confirms they are below 2% sulphur and meet a smoke emissions limit of 5g/hr?</p>	<p>We intend to develop regulations to apply this standard to all fuels used in a domestic setting.</p>
<p>20. In order to comply with any proposal to apply sulphur and smoke emissions standards to all manufactured mineral solid fuels,</p>	<p>With the support of industry, we will introduce this standard in Wales and work together to bring forward regulations.</p>

what adjustment, if any, would your business need to make?	
21. Would you agree that the Welsh Government should seek to endorse the Sustainable Fuel Register, or seek to adopt a similar scheme, for application in Wales?	Further investigation is required before endorsing a scheme such as the Sustainable Fuel Register.
22. Would you agree that any registration scheme for manufactured biomass solid fuels covering Wales should be expanded to include testing and certification for PM and other emissions?	We will work with UK Government and other administrations to consider amendment of the requirements of such a scheme to address Particulate Matter alongside CO <sub>2</sub> and other emissions.
23. If you have any further comments or suggestions on the sections on manufactured fuels, please provide them here.	We will consider comments going forward.
24. Accepting that regular maintenance by qualified professionals improves the efficiency of any appliances, do you agree that an appropriately qualified technician (installers, service engineers and sweeps) should be trained and certified to enable them to give environmental guidance and condemn dangerous appliances?	We will develop a communications campaign to demonstrate best practice for solid fuel use and this will include the importance of regular maintenance by a trained professional.
25. In regions of France a chimney must be swept annually by a registered and qualified sweep otherwise in the event of a fire caused by the stove the home insurance will not be valid. Would you agree that this approach should be adopted in Wales?	Insurance services are not devolved to Wales and any initiative such as the regular maintenance of appliances and chimneys as a condition of household insurance would need to be introduced by UK Government.  We strongly advocate regular maintenance of appliances and flues chimneys and will provide guidance on safe ways of doing this.
26. Would you consider some form of scrappage scheme to be an appropriate method to encourage the replacement of inefficient appliances currently in use?	Our 'Heat Strategy for Wales' supports the need for enabling actions to provide homeowners with advice and support for the transition to low carbon heat. Along with other initiatives within the strategy, we propose to prioritise low carbon heat as part of the next iteration of the Warm Homes Programme to support households in fuel poverty in owner-occupied and private rented homes.
27. Should any scrappage scheme be limited to households where the burning of solid fuels is the primary heat source, or should this be expanded to encourage people to use non-carbon heating?	See response to question 26.



<p>28. While it is presently outside the scope of the Welsh Government to set taxation rates would you support a proposal to explore a lower VAT rate on domestic fire and stove maintenance to encourage householders to maintain their appliances regularly?</p>	<p>A number of respondents made the valid point that lower VAT rates might encourage installation of wood burners. This unintended consequence would be counter-productive to our policy ambition to transition to low-carbon, more efficient heating sources.</p> <p>Therefore, we will not be taking forward this proposal.</p>
<p>29. Do you have a preference for any of the options for supporting households to change, outlined above?</p>	<p>As outlined in question 26, proposals to support households in the transition to low-carbon heating sources, will be captured in the Heat Strategy for Wales.</p>
<p>30. Would you agree that the coverage of smoke control areas should increase in order to better manage emissions from domestic burning?</p>	<p>We will be producing smoke control guidance as part of the Environment (Air Quality and Soundscapes) (Wales) Bill and will be encouraging local authorities to consider new smoke control areas as part of their holistic approach to local air quality.</p>
<p>31. If so in your opinion what additional coverage would be appropriate?</p>	<p>Consultation feedback on the Environment (Air Quality and Soundscapes) (Wales) Bill highlighted the need for proportionate action and a need to gather further evidence on the distinction between urban and rural areas in relation to smoke control.</p>
<p>32. Do you agree that the Welsh Government should consider available options to regulate the types of appliance and fuels that can be used in outdoor settings?</p>	<p>Based on the mixed response to this question, our focus will be on reducing emissions from the more regular practice of indoor domestic combustion.</p>
<p>33. We would like to know your views on the effects that reducing emissions from domestic burning will have on the Welsh language, specifically on opportunities for people to use Welsh.</p>	<p>We are committed to supporting the Welsh language and culture as we develop future policy and communication tools to support air quality improvements.</p>
<p>34. What effects do you think there would be? How could the positive effects be increased, or negative effects be mitigated?</p>	<p>As outlined in question 33.</p>
<p>35. Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</p>	<p>As outlined in question 33.</p>
<p>36. We have asked a number of specific questions. If you have any related issues that we have not</p>	<p>Our 'Heat Strategy for Wales' will support our ambition to improve air quality and provide support for householders to</p>

specifically addressed, please use this space to report them.	transition to low carbon ways of heating their homes.
37. Do you agree that we should stop using house coal and wet wood for heating our homes and businesses?	Our responses to questions 1-18 are reinforced by the comments received in this easy read question.
38. How long do you think we should give people and industry to stop using house coal and wet wood?	Our responses to questions 2, 9 and 10 are reinforced by the comments received in this easy read question.



Llyr Gruffydd AS

Llyr.gruffydd@senedd.cymru

30 Hydref 2023

Annwyl Llyr

Yn ystod trafodion Cyfnod 2 ar y Bil Ansawdd Aer a Seinweddau, buom yn trafod y gwelliannau a gynigiwyd mewn perthynas â hyrwyddo teithio llesol, fel modd i wella ansawdd aer ac yn fwy cyffredinol. Rwy'n ddiolchgar i'r Pwyllgor am ystyried hyn yng Nghyfnod 1 a 2.

Fel y nodwyd yn ystod y cyfarfod, byddaf yn cydweithio â'r Aelodau perthnasol gyda'r nod o gyflwyno gwelliannau newydd a fydd, gobeithio, yn gallu sicrhau cytundeb trawsbleidiol yn y Senedd.

Yn y cyfamser, i roi cyd-destun, hoffwn dynnu sylw'r Pwyllgor at yr ystod o weithgareddau hyrwyddo a gynhaliwyd hyd yma y mae awdurdodau lleol wedi'u crynhoi yn eu hadroddiadau blynyddol a gyflwynwyd i Lywodraeth Cymru.

Ar hyn o bryd rydym yn dal i gael ffurflenni ar gyfer 2022-23 ac felly rwyf wedi atodi'r ffurflenni ar gyfer y flwyddyn flaenorol, 2021-22. Bydd yr Aelodau'n nodi, er gwaethaf effaith aflonyddgar pandemig Covid, fod llawer o awdurdodau lleol yn hyrwyddo teithio llesol mewn ystod eang o ffyrdd, y tu hwnt i'w dyletswyddau statudol. Yn wir, mae'n debygol y bydd cryn dipyn o danadrodd ar raddfa lawn eu gweithgareddau oherwydd gwahaniaethau o ran dehongli.

Yn gywir,

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth Gymraeg sy'n dod i law yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 126  
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

**Lee Waters AS**

Y Dirprwy Weinidog Newid Hinsawdd  
Deputy Minister for Climate Change

## Atodiad 1 - Gweithgareddau Hyrwyddo - 2021-22, wedi'u nodi mewn Adroddiadau Blynyddol

### Abertawe

- Parhau i ddarparu mapiau o'i rwydwaith teithio llesol mewn fformat caled ac yn electronig. Mae'r mapiau'n parhau i wella'r wybodaeth sydd ar gael am y llwybrau teithio llesol mewn lleoliadau ar draws y Ddinas a'r Sir.
- Parhau â'r ymgyrch newid ymddygiad, Llwybrau Bae Abertawe, i ddarparu gwybodaeth i'r cyhoedd er mwyn eu cefnogi i fanteisio ar gyfleoedd teithio llesol a'u gwneud yn fwy ymwybodol ohonynt. Yn fwy penodol, wrth hyrwyddo Map y Rhwydwaith Teithio Llesol drafft, defnyddiwyd hysbysebion radio, y cyfryngau cymdeithasol ac ymgyrchoedd e-bost. Roedd dau bwrpas i'r hysbysebion; hyrwyddo'r rhwydwaith teithio llesol yn Abertawe gan ddefnyddi'r ymgyrch 'Fy Ffordd i...' newydd, sy'n cynnwys llawer o gyrchfannau, gweithleoedd ac ysgolion ledled Abertawe, ac yn ail, annog pobl i 'Dweud Eich Dweud' am deithio llesol yn Abertawe drwy hyrwyddo cyfleoedd ymgysylltu ac ymgynghori. Datblygwyd a hyrwyddwyd cyflwyniad ar-lein i roi rhagor o wybodaeth i'r cyhoedd am ddatblygiad Map y Rhwydwaith Teithio Llesol, ochr yn ochr â phum digwyddiad ymgynghori wyneb yn wyneb a gynhaliwyd ledled Abertawe. Cynhaliwyd digwyddiadau ymgysylltu, gweithdai i randdeiliaid a digwyddiadau ar brosiectau teithio llesol unigol ac ehangach trwy gydol y flwyddyn.
- Mae adrannau penodol ar wefan Cyngor Abertawe yn darparu gwybodaeth am deithio llesol, a gwybodaeth am gynlluniau penodol. Rydym yn eu hyrwyddo'n rheolaidd mewn erthyglau newyddion ac ar y cyfryngau cymdeithasol ar lwyfannau'r Cyngor.
- Mae Abertawe wedi datblygu rhaglen ardderchog o fuddion cymunedol yn ystod y blynyddoedd diwethaf, gan ddefnyddio Contractwyr o Fframwaith Adeiladu Peirianeg Sifil Rhanbarthol De-orllewin Cymru. Parhaodd y gwaith hwn yn 2021-22 i ddarparu rhaglen o fuddion gan gynnwys mannau parcio beiciau a sgwteri mewn ysgolion lleol. Enillodd Cyngor Abertawe Wobr Adeiladu Rhagoriaeth yng Nghymru 2020 am ei Raglen Buddion Teithio Llesol y mae wedi'i chreu i ategu'r seilwaith ar lwybrau ac mae'n parhau i adeiladu ar y rhaglen hon.

### Blaenau Gwent

- Cynhelir gweithdai ar-lein i helpu i gynyddu ymgysylltiad ar ddatblygiad Map Rhwydwaith Teithio Llesol (ATNM). Cynhaliwyd cystadleuaeth yn ystod y gweithdy fel cymhelliad i ymgysylltu am Deithio Llesol.
- Gwnaethom ddefnyddio Commonplace ar gyfer ein hymgyngoriadau cyhoeddus a statudol ar Fapiau'r Rhwydwaith Teithio Llesol. Roedd hwn yn blatfform digidol i holi pobl am eu harferion teithio llesol presennol a dysgu sut y gallem wella'r llwybrau a chynyddu'r defnydd o deithio llesol.

### Bro Morgannwg

- Fflyd Feiciau, storfeydd, helmedau a chloeon i Ysgol Uwchradd Whitmore yn sgil cyflwyno Cynllun Teithio Llesol eu Hysgol. Bydd y beiciau'n cael eu defnyddio i ennyn hyder, i osgoi teithio ar fws mini i ddigwyddiadau chwaraeon ac yn cael eu benthyg i ddisgyblion i deithio i/o'r ysgol.
- Bu Swyddogion Ysgolion Teithio Llesol Cyngor Caerdydd yn gweithio gyda 10 o ysgolion i lunio'u Cynlluniau Teithio Llesol er mwyn cael mwy o ddisgyblion i gerdded, beicio a sgwtera i'r ysgol bob dydd, gan leihau tagfeydd a gwella diogelwch ger gatau'r ysgol.
- Gosod marciau iard chwarae mewn 8 ysgol i wella sgiliau Diogelwch ar y Ffyrdd trwy chwarae.
- Darparwyd beiciau i ysgolion sy'n gweithio ar eu cynlluniau Teithio Llesol er mwyn gallu rhoi Hyfforddiant Hyfedredd Beicio i ddisgyblion Blwyddyn 5 a 6 (40 beic mewn 13 ysgol).
- Rhoi cyfleusterau storio sgwteri a beiciau i 12 ysgol yn y Fro.

- Gosod storfa/lloches beiciau yng nghartrefi gofal Tŷ Dyfan, Porthceri a Tŷ Dewi, Canolfan Gymunedol Murchfield, Canolfan Chwaraeon Colcot, Gerddi Alexandra, Canolfan Hamdden Penarth ac Arcot Street.
- Gwella'r troedffyrdd mewn gwahanol leoliadau yn y Fro gan gynnwys pantio cyrbau, palmentydd botymog, gwelliannau o amgylch bonion coed a lledu troedffordd.
- Mae'r Cyngor yn parhau'n weithgar o fewn Grŵp Siarter Staff Iach y Fro, gan weithio gyda'u partneriaid ar y Bwrdd Gwasanaethau Cyhoeddus.
- Oherwydd llwyddiant y cynllun llogi e-feiciau a lanswyd ym Mhenarth ym mis Tachwedd 2020, cafodd ei estyn i'r Sili a Dinas Powys ym mlwyddyn ariannol 21/22. Mae gan Y Fro bellach 9 gorsaf ac mae wedi ysgrifennu achos busnes ar gyfer ei estyn i'r Barri.
- Cyflwyno cynlluniau 20mya yn Saint-y-brid, Aberthin a Llanbedr-y-fro.
- Mae'r Cyngor yn diweddarau ei dudalen Teithio Llesol yn rheolaidd ac mae'n parhau i hyrwyddo ar y cyfryngau cymdeithasol:  
<https://www.valeofglamorgan.gov.uk/cy/living/Transportation/Active-Travel-and-Safe-Routes-in-Communities-Projects.aspx>
- Mae'r Cyngor wedi dylunio Logo Teithio Llesol i'w ddefnyddio i gyfathrebu ac at ddibenion cyhoeddusrwydd yn y dyfodol i hyrwyddo TLI yn y Fro.
- Gweithio gyda JamJar i gynhyrchu animeiddiad sy'n esbonio beth yn union yw Teithio Llesol. Bydd clipiau byrrach yn cael eu rhyddhau ar y cyfryngau cymdeithasol yn rheolaidd i drosglwyddo'r negeseuon.
- Mae'r Cyngor yn mynd i gyfarfodydd rheolaidd gydag Awdurdodau Lleol eraill, Llywodraeth Cymru, Sustrans ac Iechyd Cyhoeddus Cymru er mwyn rhannu arfer da a gwybodaeth. Rydym yn cynnal cyfarfodydd rheolaidd bob 6 wythnos gyda chynrychiolwyr Llywodraeth Cymru/Trafnidiaeth Cymru i drafod prosiectau cyfredol a rhai'r dyfodol.
- Mae'r Cyngor yn cynnig Hyfforddiant Beicio Lefel 1 a Lefel 2 y Safon Genedlaethol i'w holl ysgolion cynradd. Hyfforddwyd 392 o fyfyrwyr at Lefel 2 yn ystod 21/22.
- Darparwyd hyfforddiant Kerbcraft a hyfforddiant Cerddwyr Ifanc mewn ysgolion cynradd yn ystod 21/22. Parhaodd dau o dîm Diogelwch y Ffyrdd ar eu secondiad i Tracio ac Orlhain o fis Ebrill i fis Medi. Fodd bynnag, er gwaethaf problemau staffio fe wnaeth 428 o ddisgyblion gymryd rhan yn yr Hyfforddiant Cerddwyr Ifanc a 61 yn yr hyfforddiant Kerbcraft.
- Cynhaliwyd sesiynau ennyn hyder ar feic i oedolion ar y Morglawdd a chynhaliwyd digwyddiadau Dr Beic am ddim ledled y Fro i sicrhau bod beiciau trigolion y Fro yn addas i fod ar y ffordd.
- Cofrestrodd 18 ysgol ar brosiect Taith Stryd Fyw Wythnosol (WOW) i annog teithio llesol i'r ysgol o oedran ifanc.
- Gosodwyd gorsafoedd pwmp/atgyweirio beics mewn 11 lleoliad i helpu gyda gwaith trwsio brys. mae gorsafoedd ychwanegol i'w gosod yn gynnar yn 22/23.

### **Caerdydd**

- Trefnu pedwar digwyddiad hyrwyddo yn y gymuned yng Ngerddi Grange, Canolfan Gymunedol Sblot, Parc Victoria a Chastell Caerdydd fel rhan o'r ymgyrch 'Get Cycle-Ready for Spring'. Roedd pob digwyddiad yn cynnwys Dr Beic, codau diogelwch beiciau'r Heddlu, gweithgareddau hwyliog i blant gyda Pedal Emporium, cerddoriaeth fyw a stondinau ar gyfer mudiadau beicio lleol.
- Darparu standiau beiciau am ddim i sefydliadau drwy'r cynllun Parciwch eich beic.
- Hyfforddiant beicio safonol cenedlaethol mewn ysgolion
- Hyfforddiant beicio safonol cenedlaethol i bobl ifanc mewn 'Addysg heblaw yn yr ysgol' (AHY)
- Hyfforddiant beicio yn ystod gwyliau ysgol, gan gynnwys hyfforddiant Lefel 1, 2 a 3 y Safon Genedlaethol a chwrs Dysgu Reidio.

- Hyfforddiant beicio y Safon Genedlaethol un i un am ddim i oedolion sy'n byw, yn gweithio neu'n astudio yng Nghaerdydd.
- Hyfforddiant beicio y Safon Genedlaethol ar gyfer Heddlu De Cymru a Gwasanaeth Tân ac Achub De Cymru.
- Hyfforddiant teithio annibynnol ar gyfer plant ysgol ag anghenion arbennig ac oedolion bregus.
- Hyfforddiant i Gerddwyr i blant blwyddyn 2 ar draws Caerdydd. Yn dysgu'r plant sut i groesi'r ffordd yn ddiogel gydag oedolyn dros y tymor.
- Streetwise: Annog annibyniaeth a hyrwyddo teithio llesol i ddisgyblion sy'n trosglwyddo i flwyddyn 7, trwy gyfuniad o sesiynau ystafell ddosbarth a sesiynau hyfforddi ymarferol.
- Darparu hyfforddiant sgwteri gan athrawon mewn ysgolion gan ddefnyddio sgwteri a ddarperir drwy'r Grant Chwarae Digonol.
- Ymgysylltu ag ysgolion cynradd ac uwchradd i'w helpu i ddatblygu Cynlluniau Teithio Llesol
- Cynlluniau Strydoedd Ysgol i gyfyngu ar y traffig y tu allan i ysgolion a chefnogi teithiau llesol yn yr ysgol
- Gyda chymorth, cyflwyno WoW Tracker yn ysgolion Caerdydd - mae Wow yn fenter dan arweiniad disgyblion lle mae plant yn hunan-adrodd sut maen nhw'n cyrraedd yr ysgol bob dydd. Os ydynt yn teithio'n gynaliadwy (cerdded, beicio neu sgwtera) unwaith yr wythnos am fis, maent yn cael bathodyn yn wobr.
- Datblygu adnoddau addysgol ar thema teithio llesol gan gynnwys cynlluniau gwersi sy'n gysylltiedig â'r Cwricwlwm Newydd
- Rhaglen Ysgolion Teithio Llesol Hyrwyddedig trwy ffrwd pwrpasol ar Twitter

### Caerffili

- Cwblhau Map y Rhwydwaith Teithio Llesol gan ymgynghori ac ymgysylltu'n eang â rhanddeiliaid a'r cyhoedd
- Cynllun llwybr beicio arbrofol Lewis Street fel Ymateb i Covid, Ystrad Mynach: wedi'i droi'n barhaol
- Cynllun llwybr beicio arbrofol Bwl Road fel Ymateb i Covid, Ystrad Mynach: wedi'i droi'n barhaol

### Casnewydd

- Adolygu Map Rhwydwaith Teithio Llesol : Defnyddio Lle Cyffredin i Adolygu'r Map. Defnyddio'r holl gyfryngau cymdeithasol i hyrwyddo'r adolygiad. Datblygu fideo ar gyfer Ysgolion Uwchradd i'w hannog i gymryd rhan yn yr arolwg o'r Map.
- Darlledu Fideo Hyrwyddo Teithio Llesol ar sianeli cyfryngau cymdeithasol ac ar dudalen laniio Teithio Llesol.
- Datganiadau i'r wasg ynghylch agor yr holl lwybrau teithio llesol
- Ymgysylltu ag ysgolion lleol i gymryd rhan yn y Diwrnod Aer Glân sy'n cynnwys llwybrau Teithio Llesol sy'n berthnasol i'w lleoliad
- Ymgysylltu ag ysgolion cynradd lleol i gymryd rhan yn Grantiau Llwybrau Diogel mewn Cymunedau (SRiC).

### Castell-nedd Port Talbot

- Adnewyddu mapiau teithio llesol – i gydymffurfio â Deddf Teithio Llesol (Cymru) 2013 cyflwynwyd ein Map Rhwydwaith Teithio Llesol i Lywodraeth Cymru ar 31 Rhagfyr 2021 yn dilyn tri ymgynghoriad. Cymeradwywyd Map Rhwydwaith Teithio Llesol y cyngor ym mis Awst 2022. Er mwyn darparu rhagor o wybodaeth gefndirol am y Map Rhwydwaith Teithio Llesol diwygiedig, mae'r cyngor wedi cynnal archwiliadau o 4 llwybr beicio, 92 o lwybrau cerdded a 204 o lwybrau ar y cyd yn ystod y flwyddyn ariannol hon. Mae'r llwybrau hyn yn cynnwys holl lwybrau'r dyfodol byr dymor ar y mapiau newydd.
- Hyrwyddo Cynlluniau a Monitro a Gwerthuso - Mae ffotograffydd wedi tynnu ffotograffau hyrwyddo mewn mannau allweddol yng Nghastell-nedd Port Talbot.

Cafodd 47 o lwybrau eu monitro a'u gwerthuso i gofnodi data am gerddwyr, beiciau a thraffig. Cyflogodd y cyngor ymgynghorydd i ddylunio tudalennau gwe teithio llesol gwedd newydd ynghyd â brandio, strapline ac asedau cyfryngau cymdeithasol. Disgwylir i'r tudalennau gwe newydd hyn gael eu lansio pan fydd ein Map Rhwydwaith Teithio Llesol ar gael i'r cyhoedd.

- Cyswllt Mewnol â chydweithwyr o adrannau Cynllunio, Priffyrdd, Diogelwch ar y Ffyrdd, Gofal Stryd (cynnal a chadw llwybrau) ac adrannau Addysg i annog hyrwyddo a darparu teithiau llesol mewn datblygiadau newydd.
- Ffyrdd Cynhaliodd y Tîm Diogelwch Ffyrdd nifer o weithgareddau i hyrwyddo Teithio Llesol gan gynnwys:
  - Cyclecraft (Hyfforddiant beicio ar y ffordd): 16 ysgol, 508 o ddisgyblion
  - Addysg Dosbarth Cynradd: 31 ysgol 5822 o ddisgyblion
  - Ymwybyddiaeth am Feicio (Blwyddyn 3- Blwyddyn 6): 16 ysgol, 972 o ddisgyblion
  - Hyfforddiant Sgwtera (pob oedran): 16 ysgol, 750 o ddisgyblion
  - Beicio Cyfnod Sylfaen (Blwyddyn 1 a 2): 1
  - Clwb Afancod, 35 o blant
  - Teithiau Cerdded Diogelwch ar y Ffyrdd (pob oedran): 2 ysgol, 87 o blant
  - Cwrs Hyfforddi Byrt i Gerddwyr (hyfforddiant 6 wythnos): 67 Ysgolion, 2,143 o ddisgyblion
  - Big Pedal (y cyngor yn cefnogi Sustrans): 67 o ysgolion, 2717 o deithiau
  - Criw Hanfodol - 51 ysgol, 1704 o ddisgyblion

### **Ceredigion**

- Cynnal trydydd cam yr ymgysylltiad cyhoeddus drwy Commonplace ar gyfer yr Adolygiad o Fap Rhwydwaith Teithio Llesol Ceredigion. Gyda chymorth Sustrans, cafodd yr ymgynghoriad cyhoeddus 12 wythnos statudol hwn sylw a chyhoedduswyd eang. Yna gwnaed gwelliannau terfynol i Fap y Rhwydwaith Teithio Llesol cyn ei gyflwyno i'r Gweinidog ddiwedd Mawrth 2022.
- Mae swyddog Teithiau Llesol Sustrans wedi cyflwyno amryw o sesiynau mewn ysgolion ar draws Ceredigion yn dilyn llacio cyfyngiadau COVID19. Roedd y rhain yn cynnwys sgiliau beicio/sgwtera, Dr Beiciau (peirianwyr beiciau a'r swyddog Teithiau Llesol yn archwilio a thrwsio beiciau/sgwteri'r ysgol gyfan - disgyblion a staff), sesiynau Llwybrau Diogel Mewn Cymunedau i nodi rhwystrau rhag teithio llesol a chanfod atebion, sesiynau trwsio tyllau mewn teiars a chynnal a chadw beiciau gyda blynnyddoedd 4/5/6, cydweithio ag E-Symud (cynllun e-feic / e-feic cargo Sustrans, a ariannir gan Lywodraeth Cymru) i gefnogi'r gymuned ysgol yn gyffredinol, cymorth rhithwir parhaus, hyrwyddo a hwyluso digwyddiadau a chystadlaethau ysgol gyfan/cenedlaethol e.e. wythnos 'Beicio i'r Ysgol', 'Stroliwch a Roliwch' a mentrau eraill, cyflenwi ysgolion â sgwteri ar gyfer 'sgwter yr wythnos' / cronfa sgwteri.
- Tîm Diogelwch ar y Ffyrdd Cyngor Sir Ceredigion (CSC) yn darparu Hyfforddiant Beicio Lefel 1 a 2 y Safon Genedlaethol i 341 o ddisgyblion cynradd.
- Darparu Hyfforddiant Beicio Lefel 2 y Safon Genedlaethol i 10 o oedolion hefyd.
- Gweithiodd Ceredigion efo Sustrans i adolygu a diweddarau'r Map Teithio Llesol ar gyfer Aberystwyth, sydd wedi'i lwytho ar we-dudalen Teithio Llesol CSC.
- Cynigiwyd y cynllun 'Beicio i'r Gwaith' i weithwyr CSC, gyda 2 ffenestr ymgeisio yn ystod y flwyddyn.

### **Conwy**

- Ymgyrch hyrwyddo ac ymwybyddiaeth barhaus ynghylch Teithio Llesol;
- Ymgyrch codi ymwybyddiaeth am Deithio Llesol ar y cyfryngau cymdeithasol
- Hyfforddiant beicio a rhaglenni Kerbcraft mewn ysgolion
- Cyfarfodydd gyda datblygwyr, ymgynghorwyr a chysylltwyr i'w hysbysu a'u cynghori ar eu dyletswyddau, cyfrifoldebau, amcanion a gofynion o ran Teithio Llesol;



- Ymgysylltu â thrigolion a busnesau lleol lle cynigir llwybrau newydd, i'w hysbysu am ddyluniad llwybrau ac am Ddeddf Teithio Llesol Cymru ehangach.

### **Gwynedd**

- Mae'r Cyngor wedi gwneud tipyn o waith cynnal a chadw ar lwybrau cerdded a beicio o fewn y sir yn ogystal ag ymgynghori gyda thrigolion ar ffyrdd o wella'r rhwydwaith cerdded a beicio. Mae gan y Cyngor wefan sy'n hybu teithio llesol. Mae'r wefan yn cynnwys fideos defnyddiol a gwybodaeth berthnasol parthed y fenter Teithio Llesol.

### **Merthyr Tudful**

- Gwaith gwella llwybrau gan gynnwys gosod wyneb newydd, draenio a phantau ar gwrbinau
- Lledu llwybrau troed a chreu gerddi glaw gan blannu 3000 o goed
- Croesfannau mwy diogel i gerddwyr ar linellau awydd yng nghanol y dref a chroesfannau newydd i gerddwyr
- Neilltuo lle ar y ffordd i gerddwyr a beicwyr ar hyd Llwybr Taf
- Bolardiau newydd
- Arwyddion Llwybr Taf gwell
- Arweinwyr teithio llesol mewn ysgolion cynradd yn hyrwyddo teithio llesol i'r ysgol
- Hyrwyddo Merthyr fel cyrchfan i dwristiaid cerdded a beicio gyda fideos a thafenni
- Lefel 1 a 2 y Safon Genedlaethol i 235 o ddisgyblion. 'Balanceability' i 2232 o ddisgyblion, sesiynau Dysgu Reidio i 1146 o ddisgyblion, Lefel 3 i 120 o ddisgyblion.

### **Pen-y-bont ar Ogwr**

- Cynnal ymgynghoriad ffurfiol ar Fap y Rhwydwaith Teithio Llesol rhwng Medi 2021 a Thachwedd 2021. Fe'i trefnwyd gennym ni, Sustrans a Llywodraeth Cymru, gyda'r nod o ofyn i aelodau'r cyhoedd am eu hadborth ynghylch lle mae'r angen mwyaf am newid a'r potensial uchaf i fwy o bobl ddewis teithio llesol. Roedd yn ymgynghoriad cyhoeddus statudol cam 3 12 wythnos o hyd ar fap drafft diwygiedig o'r Rhwydwaith Teithio Llesol cyn ei gyflwyno i Lywodraeth Cymru.
- Comisiynu map ar ffurf llyfryn o lwybrau teithio llesol ar gyfer preswylwyr ac ymwelwyr
- Darparu hyfforddiant Kerbcraft i 25 ysgol a manteisiodd 750 o ddisgyblion
- Gweithredu cynllun Beicio i'r Gwaith HMRC lle mae gweithwyr yn cael eu hannog i brynu beiciau ar gyfraddau gostyngedig. Mae'r cynllun hwn ar agor i weithwyr ddwywaith yn y flwyddyn galendr.
- Datganiadau i'r wasg i godi ymwybyddiaeth am lwybrau a chyfleusterau newydd a ddarperir yn 2021/2022.
- Cyswllt parhaus â chydweithwyr o'r adrannau Cynllunio, Priffyrdd ac Addysg i'w hannog i hyrwyddo a darparu teithio llesol fel rhan o ddatblygiadau newydd
- Parhau i weithio mewn partneriaeth gyda chymdeithasau tai i gynnwys teithio llesol o fewn prif gynlluniau/gweithgareddau hyrwyddo.
- Cadw cyswllt ac ymgysylltu cyson â swyddogion cynllunio wrth asesu gofynion Teithio Llesol datblygiadau defnydd tir yn unol â Pholisi Cynllunio Cymru.
- Gweithio mewn partneriaeth ag Ecolegydd y Fwrdeistref i hyrwyddo teithio llesol a seilwaith gwyrdd mewn datblygiadau newydd a chynlluniau priffyrdd/eraill.
- Yn ei adroddiad asesu llesiant, rydym wedi cydnabod pwysigrwydd cynlluniau teithio llesol ac yn bwriadu hyrwyddo teithio llesol yn ein cynllun llesiant ar gyfer y flwyddyn nesaf.
- Mae sesiynau Teithiau Iach wedi cael eu cyflwyno i ysgolion cynradd ac uwchradd sy'n cymryd rhan yn rhaglen Teithiau Iach Sustrans: Ysgol Maesteg ac Ysgol Gynradd Aberogwr a'r Fro: 3 sesiwn cynnal a chadw beiciau, 3 sesiwn sgiliau sgwter x 460 o ddisgyblion yn cymryd rhan.

- Stroliwch a Rholiwch, a drefnir gan yr elusen Sustrans ac a gefnogir yn lleol gennym ni. Canlyniadau 2022: 20 o ysgolion yn cymryd rhan. Cyfanswm y teithiau: 16514

### **Powys**

- Mae'r cyngor yn defnyddio ei sianeli cyfryngau cymdeithasol a'i wefan teithio llesol i ddarparu gwybodaeth am deithio llesol, gan gynnwys: - manteision teithio llesol - yr holl fentrau cyfredol yn y sir - Map y Rhwydwaith Teithio Llesol (ar gael i'w lawrlwytho).
- Mae teithio llesol hefyd yn cael ei hyrwyddo a'i annog gan feysydd gwasanaeth eraill - gan gynnwys adrannau addysg, tai, rheoli datblygu a chynllunio - gan alluogi cyhoeddusrwydd ac ymwybyddiaeth ehangach
- Mae'r Cyngor yn cydnabod pwysigrwydd ysgolion a phobl ifanc o ran cyflawni newid moddol ac mae'n cynnal mentrau a gweithgareddau mewn ysgolion i hyrwyddo teithio llesol yn rheolaidd. Yn ystod 2021/22 roedd hyn yn cynnwys gwahodd ysgolion a disgyblion i gymryd rhan ym mhrosiect Map y Rhwydwaith Teithio Llesol a darparu Hyfforddiant Beicio Kerbcraft a'r Safon Genedlaethol. Bu'r cyngor yn cefnogi mentrau ysgolion Sustrans hefyd, gan gynnwys gwersi teithio llesol a "Stroliwch a Rholiwch". Mae'r cyngor yn parhau i gynorthwyo Sustrans i hyrwyddo'r rhwydwaith beicio cenedlaethol yn y sir, a thrwy gydol 2021/22 mae hefyd wedi cydweithio mwy â rhanddeiliaid allweddol eraill i hyrwyddo a chodi mwy o ymwybyddiaeth leol am deithio llesol. Roedd hyn yn cynnwys trafodaethau rheolaidd gyda chynghorau tref a chymuned, Bwrdd Iechyd Addysgu Powys, Parc Cenedlaethol Bannau Brycheiniog, Awdurdod Cefnffyrdd Gogledd a Chanolbarth Cymru, Cymdeithas Cefnffyrdd De Cymru
- Mae'r cyngor yn gwella'r ddarpariaeth yn barhaus i'w gwneud hi'n haws cerdded neu feicio o fewn trefi. Yn 2021 dechreuwyd adolygiad llawn o arwyddion llwybrau o fewn ardaloedd penodol. Rhoddwyd y gwaith hwn ar gomisiwn i Sustrans, gydag amserlen lawn wedi'i chynhyrchu ar gyfer Ystradgynlais a'r Drennewydd. Yn ystod 2021/22 hefyd daeth peilot beiciau trydan bach i ben, a welodd ychydig o staff rheng flaen cyngor Powys a Bwrdd Iechyd Addysgu Powys yn cael beic trydan ar gyfer teithiau busnes byr. Yn ystod y cynllun gwnaed cyfanswm o 4000 o filltiroedd ar e-feic!

### **Rhondda Cynon Taf**

- Cynnal rhaglen barhaus o waith i uwchraddio / gwella rhannau o droedffyrdd ar draws y Fwrdeistref Sirol gan gynnwys gosod wyneb newydd, pantio cwrbynau, rheiliau newydd a lledu troedffyrdd.
- Symud rhwystrau, mewn lleoliadau dethol a fesul achos, yn dilyn asesiad o feini prawf ym mhob lleoliad
- Parhau i gymryd rhan mewn mentrau i hyrwyddo RhCT fel cyrchfan i dwristiaid cerdded a beicio.
- Parhau i gymryd rhan yn y rhaglen Teithiau Llesol (mewn Ysgolion). Wedi'i drefnu ar y cyd â Sustrans.
- Sicrhau bod tudalennau gwefan y Cyngor sy'n ymwneud â theithio llesol yn cael eu diweddarau.
- Ar y cyd â Halfords, bwrw ymlaen â Chynllun Cycle2Work y Cyngor i staff fel rhan o'i Raglen Buddion i Staff.
- Darparu hyfforddiant beicio'r Safon Genedlaethol i 801 o ddisgyblion yn 2021 - 2022 gan roi'r hyfforddiant angenrheidiol i feicwyr ifanc fod yn feicwyr mwy diogel a chymwys.
- Cyflwyno Hyfforddiant Kerbcraft / Cerddwyr i Blant i 2142 o ddisgyblion yn 2021 - 2022 i roi i ddisgyblion ifanc y sgiliau a'r ymwybyddiaeth o ddiogelwch ar y ffyrdd i fod yn gerddwyr mwy diogel
- Gwaith adfer gerllaw Ynys-hir lle bu tirlithriad arall gan arwain at gau'r llwybr teithio llesol yn dilyn tywydd garw. Mae'r llwybr hwn bellach wedi'i ailagor.

- Gwaith adfer helaeth yn y Rhondda Fach, yn dilyn tirlithriad mawr ger Tylorstown a gaeodd lwybr teithio llesol allweddol yn dilyn Storm Dennis. Yn sgil cwblhau Camau 1 – 3, mae'r rhan fwyaf o'r llwybr teithio llesol wedi ailagor. Bwrw ymlaen nawr â Cham 4 er mwyn gallu ailagor yn llawn.
- Pont droed well rhwng Stryd Dyfodwg a River Terrace yn Nhreorci, yn lle'r hen un, er lles teithwyr llesol.  
Cynnal ymarfer ymgynghori ar-lein ac wyneb yn wyneb mawr (mewn lleoliadau cyhoeddus) i gael adborth gan drigolion a rhanddeiliaid lleol am Fap y Rhwydwaith Teithio Llesol drafft yr oedd y Cyngor yn ei baratoi fel rhan o'i ddyletswyddau o dan Ddeddf Teithio Llesol (Cymru) 2013.

## Sir Benfro

- Yn sgil hyfforddiant i gerddwyr mewn ysgolion drwy'r rhaglen Kerbcraft gwelwyd 1,415 o ddisgyblion yn cymryd rhan ar gost o £45,096 wedi'i ariannu gyda Grant Diogelwch ar y Ffyrdd Llywodraeth Cymru.
- Darparwyd hyfforddiant Safonau Beicio Cenedlaethol i 827 o ddisgyblion Lefel 2 a 51 ar Lefel 1 ar gost o £44,925 wedi'i ariannu gyda Grant Diogelwch ar y Ffyrdd Llywodraeth Cymru.
- Cynhaliwyd sesiynau Criw Hanfodol ar gyfer 1,400 o ddisgyblion drwy ddigwyddiad ar-lein gyda Teithio Llesol wedi'i gynnwys yn y rhaglen.
- Cyswllt parhaus â chydweithwyr o'r adrannau Cynllunio, Priffyrdd ac Addysg ihyrwyddo a darparu Teithio Llesol fel rhan o ddatblygiadau newydd.
- Mae Teithio Llesol wedi cael ei ystyried mewn modd cynhwysfawr yn y Cynllun Datblygu Lleol a'r Seilwaith Gwyrdd
- Mae'r Awdurdod wedi gweithio gyda Sustrans a nifer o randdeiliaid sy'n adeiladu Llwybr Aml-Ddefnyddiwr sy'n cysylltu aneddiadau Teithio Llesol Arberth a Hwlfordd.
- Ymwelodd Sustrans a swyddogion Cyngor Sir Benfro â Hook Primary i gwrdd â phennaeth a llywodraethwyr i holi sut y gellid gwneud cerdded a beicio yn fwy diogel. Sustrans wedi ymweld ag Ysgol Glannau Gwaun yn Abergwaun i gyflwyno 3 diwrnod o sgiliau sgwtera (25 sesiwn wedi'u cyflwyno) - a'u helpu i brynu 60 o sgwteri a helmedau drwy'r rhaglen Teithiau Mwy Diogel. Mae Sustrans wedi cofrestru mwy o ysgolion yn Sir Benfro i ymuno â'r Rhaglen Teithiau Mwy Diogel. Gan gynnwys tair Ysgol Penrhyn Dewi.
- Cyhoeddiad Parc Arfordir Penfro 'Arfordir i'r Arfordir' yn hyrwyddo mynediad cynaliadwy gan gynnwys cerdded a beicio. (Wedi'i ariannu trwy hysbysebion).
- Parhau mewn partneriaeth ag Awdurdod Parc Cenedlaethol Arfordir Penfro i ddatblygu llwybrau newydd a hyrwyddo cerdded a beicio gyda sefydlu seminar i addysgu staff am fanteision cerdded, gan gynnwys cyfarwyddyd ar fesurau diogelwch. (Awdurdod Parc Cenedlaethol Arfordir Penfro).
- Mae'r rhaglen "Let's Walk Pembrokeshire" yn cynnwys partneriaid yn y sector gwirfoddol, y Parc Cenedlaethol, adrannau'r Cyngor a'r Sector Iechyd i edrych ar gynlluniau arloesol i hyrwyddo cerdded a beicio.
- Mae prosiectau Walkability fel rhan o'r cynllun atgyfeirio Ymarfer Corff wedi bod yn annog pobl sydd â phroblemau iechyd i ymarfer mwy ac yn cael eu rhedeg mewn partneriaeth ag Awdurdod Parc Cenedlaethol Arfordir Penfro. Llwybrau cerdded a beicio yn cael eu hyrwyddo ar wefannau Sir Benfro (wedi'u hariannu gan Gyngor Sir Penfro a Pharc Cenedlaethol Arfordir Penfro). Hyrwyddwyd hefyd ar y cyfryngau cymdeithasol
- Cynhaliwyd menter beicio Bike Mobility ar gyfer pobl o wahanol alluoedd mewn partneriaeth â Value Independence.
- Cynghori datblygwyr ar ofynion i sicrhau bod strategaeth drafnidiaeth pob datblygiad yn cysylltu â'r rhwydwaith llwybrau troed a'r llwybrau cyd-ddefnydd i sicrhau bod opsiynau amldefnydd ar gael

- Gwaith monitro Teithio Llesol gan gynnwys gosod peiriannau cyfrif mewn nifer o leoliadau i fonitro cerdded a beicio
- Cyhoeddwyd datganiadau i'r wasg i hyrwyddo gwaith a ariennir gan grant ar gyfer cynlluniau Teithio Llesol newydd a seilwaith cynlluniau Llwybrau Diogel mewn Cymunedau a chafodd y rhain sylw yn y wasg leol ac fe'u gwelwyd ar wefan newyddion y Cyngor a'r cyfryngau cymdeithasol.
- Mae'r Awdurdod wedi bod yn gweithio gydag ysgolion (datblygu Cynlluniau Teithio) i annog cerdded a beicio
- Mae'r Cyngor yn cynnal llochesi beicio a chawodydd i staff allu cymudo i'r gwaith ar droed neu ar feic.
- Mae'r Awdurdod yn hyrwyddo'r cynllun aberthu cyflog beicio i'r gwaith i staff
- Cynnal rhaglen waith i wella rhannau o droedffyrdd ar draws y Sir gan gynnwys gosod wyneb newydd, pantio cwrbinâu, rheiliau newydd a lledu troedffyrdd
- Cynnal nifer o welliannau i'r priffyrdd er budd beicwyr fel wynebau newydd mewn gwahanol leoliadau ledled y Sir.
- Cymryd rhan mewn mentrau i hyrwyddo Sir Benfro fel cyrchfan i dwristiaid cerdded a beicio.
- Mae'r Cyngor yn rheoli cynllun cerddwyr haf Dinbych-y-pysgod mewn cydweithrediad clos â phreswylwyr a'r holl randdeiliaid

### Sir Fynwy

- Yn 2021 – 22 bwriwyd ymlaen i ail-alinio Teithio Llesol â safle gwasanaeth MonLife yng Nghyngor Sir Fynwy. Yn ogystal â sicrhau grant Teithio Llesol, yn ystod cyfnod heriol (oherwydd COVID), gwnaethom roi pwyslais cryf ar gasglu data a datblygu cynlluniau. Defnyddiwyd llawer iawn o amser Swyddogion i broses Mapio Rhwydwaith Teithio Llesol, i'w gyflwyno ym mis Rhagfyr 2021. Rhai ystadegau o'r ymgynghoriad hwn:
  - 100% o'r ysgolion yn cymryd rhan
  - Ymatebodd 2,328 o blant a phobl ifanc
  - 2,713 o ymatebion gan oedolion
  - 772 awr o amser y cyhoedd i ymgynghori
  - Roedd 80% o blant cynradd, 63% o bobl ifanc a 73% o oedolion eisiau mwy deithio llesol
  - 100 o lwybrau bellach yn cyrraedd safonau teithio llesol, cynnydd o 73 ers mapiau 2016.
- Seilwaith ysgolion cynradd – fel rhan o'r gwaith gosod, gwnaed mwy o waith gydag ysgolion cynradd i hyrwyddo teithiau llesol, gan gynnwys darparu deunyddiau ac ymgysylltu ehangach â'r cyngor.
- Mae traciwr WOW wedi cael ei gyflwyno i sawl ysgol gynradd i gofnodi defnyddwyr Teithio Llesol a hyrwyddo Teithio Llesol mewn ysgolion.
- Fel rhan o'r cynllun pilot cenedlaethol 20mya, mae cydweithwyr o'r adran Priffyrdd wedi trefnu parthau treialu 20 mya mewn 2 bentref, gan helpu i ddatblygu amgylchedd sy'n ffafriol i gerdded a beicio.
- Mapio – Rydym wedi creu cyfres o fapiau teithio llesol ar gyfer ein 7 ardal ddynodedig. Byddwn yn eu dosbarthu i ysgolion yn yr aneddiadau i ysgogi trafod, rhoi gwybodaeth am deithiau teithio llesol a hyrwyddo newid moddol.
- Aelodau etholedig - Cynhaliwyd sesiynau briffio ac ymgysylltu gydag aelodau etholedig o'r cyngor a chyda chynghorau tref. Mae hyn wedi sicrhau bod yr agenda Teithio Llesol yn flaenllaw ac yn ganolog i flaenoriaethau'r Cyngor ac mae aelodau etholedig yn dod yn llysgenhadon i'r gwaith sy'n cael ei wneud.
- Datganiadau i'r wasg – i ddatblygu cynlluniau ehangach a chyllid Teithio Llesol, rydym ni fel cyngor wedi cyhoeddi sawl datganiad i'r wasg yn ymwneud â Theithio Llesol i hyrwyddo cynlluniau, ymgynghoriadau a gwaith Teithio Llesol.
- Ailgyflwyno cynllun Beicio i'r Gwaith i staff Cyngor Sir Fynwy i annog newid dulliau teithio.

## **Sir Gaerfyrddin**

- Tîm Diogelwch ar y Ffyrdd yn cydweithio ag ysgolion i annog teithiau llesol: mis cerdded i'r ysgol; Ysgolion Iach ac Ecosgolion; Kerbcraft, Safon Beicio Genedlaethol, beicio mwy diogel ac ati, Teithiau Iach (gyda Sustrans)
- Treialu cynlluniau teithio personol i'r ysgol gydag ardal De Llanelli i hyrwyddo cerdded a beicio i'r ysgol
- Hyrwyddo cynllun beicio i'r gwaith
- Digwyddiadau ymgynghori ar lwybrau diogel mewn nifer o ysgolion a chymunedau i gasglu adborth a hyrwyddo teithiau llesol i breswylwyr a myfyrwyr
- Cyngor Sir Gaerfyrddin yn unig i ymestyn gwefan ymgynghori ar deithio llesol i gael adborth gan y cyhoedd ar ein rhwydwaith cyffredinol - ymarferoldeb newydd i alluogi defnyddwyr i uwchlwytho lluniau a gwasanaethau lleoli.
- Mae'r adran Teithio Llesol ar y wefan yn cynnwys gwybodaeth am lwybrau a chynlluniau i annog cerdded / beicio
- Sir Gaerfyrddin yw'r unig gyngor i estyn y wefan i ymgynghori ar deithio llesol i glywed ymateb y cyhoedd am ein rhwydwaith – defnyddwyr yn cael llwytho ffotos a gwasanaethau lleoli bellach.

## **Sir y Fflint**

- Penodi ymgynghorwyr i ymgysylltu ag wyth ar hugain o ysgolion yn Sir y Fflint i nodi gwelliannau ar gyfer cerdded a beicio yng nghyffiniau'r ysgolion yn ogystal â llwybrau teithio llesol ehangach i'r ysgolion. Mae'r astudiaeth yn cynnwys dadansoddi data gan gynnwys arolygon ysgolion, data côd post disgyblion, archwiliadau safle a mewnbwn gan randdeiliaid. Mae'n cynnwys dwy elfen allweddol: 1. Ymyriadau o fewn cyffiniau'r ysgolion megis cyfyngiadau parcio, terfynau 20mya, tawelu traffig ac arwyddion ffyrdd a 2. Llwybrau teithio llesol ehangach i'r ysgol.
- Gosod deg cofnodwr data i gofnodi'r defnydd o lwybrau teithio llesol presennol er mwyn gallu hyrwyddo llwybrau a chasglu tystiolaeth ar gyfer cynigion yn y dyfodol.
- Ffurio grŵp Ymgysylltu Teithio Llesol i hyrwyddo llwybrau teithio llesol a rhannu mentrau newydd a chynigion yn y dyfodol.
- Datblygwyd tudalen we Teithio Llesol ar wefan Cyngor Sir y Fflint. Mae'r dudalen yn cynnwys gwybodaeth am Deithio Llesol gyda dolenni defnyddiol i wahanol safleoedd fel Sustrans, NHS change 4 life – Teithio Llesol, Diogelwch Ffyrdd, Hawliau Tramwy a Beicio a dogfennau defnyddiol eraill sy'n ymwneud â Teithio Llesol, gan gynnwys cyhoeddi'r Mapiau Llwybr Presennol, y Map Rhwydwaith Integredig ac Adroddiadau Blynyddol.
- Ar hyn o bryd mae Cyngor Sir y Fflint yn gweithredu ei Gynllun Beicio i'r Gwaith drwy gydol y flwyddyn.

## **Tor-faen**

- Cynnal rhaglen gyfathrebu eang iawn i godi ymwybyddiaeth am deithio llesol yn Nhor-faen yn 2021-2022, gan gynnwys trwy gyfarfodydd wyneb yn wyneb a chyfarfodydd ar-lein ar Teams/Zoom, ar y cyfryngau cymdeithasol, y wefan, e-bost, post uniongyrchol ac ati. Mae ffrydiau cyfryngau cymdeithasol Cyngor Tor-faen wedi cael eu defnyddio sawl gwaith i dargedu pob cynulleidfa. Cynhaliwyd pwyntiau ymgysylltu yng nghanol trefi i siarad â phobl ar bob agwedd ar deithio llesol ac i ddarparu gwybodaeth
- Roedd y rhaglen gyfathrebu yn ategu'r broses ymgynghori ar Fap y Rhwydwaith Teithio Llesol Lleol a gynhaliwyd dros sawl mis. Gwnaethom gysylltu â 180 o sefydliadau/ysgolion/cyrff cyhoeddus/grwpiau/landlordiaid cymdeithasol cofrestredig a'u tebyg.
- Ymgysylltu â holl ysgolion Tor-faen am fentrau cenedlaethol Cerdded a Beicio i'r Ysgol a menter arbennig Teithio Llesol i'r Ysgol lechyd Cyhoeddus Cymru.
- Cynnal arolygon o deithio llesol mewn ysgolion a datblygu Cynlluniau Teithio Llesol newydd gyda sawl ysgol.

- Ymgysylltu â phobl ifanc drwy Fforwm Ieuenctid Tor-faen (16-25 oed) a mynd i ddiwyddiadau pobl ifanc i gasglu barn am Deithio Llesol.
- Ymgysylltu â nifer o grwpiau symudedd ac anabledd gan gynnwys grŵp Fforwm Mynediad Torfaen a 'Sight Cymru' a gydag unigolion amrywiol a ymatebodd i'r negeseuon cyfathrebu.
- Roedd mwy o bwyslais ar deithio llesol yn ein gwybodaeth i Gynghorwyr a thirgion am y cynlluniau SRiC a teithio llesol sy'n cael datblygu a'u hadeiladu. Yn yr un modd, roedd mwy o bwyslais ar deithio llesol yn ymatebion Priffyrdd Tor-faen i ymholiadau gan drigolion ac aelodau'r cyhoedd.
- Roedd pwyslais cryfach ar deithio llesol wrth ystyried ceisiadau datblygu priffyrdd newydd a cheisiadau cynllunio.
- Parhau i ddarparu hyfforddiant beicio'r Safon Genedlaethol a'r hyfforddiant hyfedredd beicio traddodiadol sy'n rhoi'r hyfforddiant angenrheidiol i feicwyr ifanc fod yn feicwyr mwy diogel a chymwys.
- Parhau â'r hyfforddiant i gerddwyr ifanc.

### **Wrecsam**

- Gweithdy i gyflwyno teithio llesol i aelodau'r Cyngor.
- Wedi cwrdd ag elusen nam ar eu golwg i drafod yr effeithiau y byddai teithio llesol yn eu cael iddyn nhw
- Penodi swyddog teithio llesol pwrpasol
- Mynd i ddiwyddiad Llythrennedd Carbon i Awdurdodau Lleol er mwyn dysgu pwysigrwydd lleihau ein hól troed carbon a sut mae teithio llesol yn cefnogi hynny.
- Darparu storfa feiciâu ddiogel newydd yng nghanolfan lesiant newydd Wrecsam.
- Datblygu ein Mapiau Rhwydwaith Teithio Llesol ac ymgynghori arnynt cyn eu cyflwyno i'w cymeradwyo.
- Ymgysylltu â nifer o ysgolion cynradd mewn gweithdai (gyda chymorth Sustrans) er mwyn cyfrannu at Fapiau'r Rhwydwaith Teithio Llesol.
- Darparu gwybodaeth, cyngor a chymorth wrth gaffael a darparu rhagor o raciau beiciau mewn canolfannau cymunedol lleol
- Cynnal grwpiau a chyflwyniadau gan swyddogion teithio llesol.
- Drwy ddefnyddio'r Mapiau Rhwydwaith Teithio Llesol, cynhyrchu rhestr flaenoriaethu llwybrau teithio llesol ar gyfer y dyfodol

### **Ynys Môn**

- Cododd Cyngor Sir Ynys Môn ymwybyddiaeth a hyrwyddo teithiau teithio llesol trwy amrywiol ddulliau. Gan gynnwys: a) Hysbyseb mewn papurau newydd lleol a rhanbarthol b) ymgyrchoedd radio c) diweddarau gwefan gorfforaethol Cyngor Sir Ynys Môn) ymgyrchoedd hysbysebu ar y Cyfryngau Cymdeithasol
- Yn ogystal, cyhoeddwyd arolwg a phhecyn gwersi i ysgolion cynradd ac uwchradd mewn ardaloedd Teithio Llesol er mwyn deall beth yw barn disgyblion ac i hyrwyddo teithio llesol yn eu hardaloedd.
- Cynhaliwyd ymgynghoriad cyhoeddus cynhwysfawr rhwng mis Mawrth a mis Tachwedd 2021 i roi cyfle i'r cyhoedd fynegi eu barn a'u sylwadau ar y llwybrau Teithio Llesol presennol ac ar llwybrau newydd posibl yn y dyfodol (rhan o'r Map Rhwydwaith Teithio Llesol (ATNM)). Trwy'r broses hon, derbyniwyd dros 1,200 o ymatebion a thua 3,600 o gyfraniadau gan y cyhoedd. Mae hyn yn dangos bod yr ymgynghoriad wedi bod yn ffordd effeithiol o hyrwyddo teithiau teithio llesol, gwella eu dealltwriaeth o'r term, a chael safbwyntiau craff ar gyfer gwelliannau yn y dyfodol.

Julie James AS, y Gweinidog Newid Hinsawdd  
Lee Waters AS, y Dirprwy Weinidog Newid Hinsawdd

20 Hydref 2023

## Craffu ar Gyllideb Ddrafft 2024-25

Annwyl Julie a Lee,

Mae Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith wedi dechrau paratoi ar gyfer y gwaith craffu ar Gyllideb Ddrafft Llywodraeth Cymru ar gyfer 2024-25.

Rydym yn deall y bydd y gyllideb ddrafft yn cael ei chyhoeddi ar 19 Rhagfyr 2022, ac felly rydym yn rhagweld y byddwn yn cynnal sesiwn graffu gyda chi ym mis Ionawr 2024. Bydd y tîm Clercio yn cysylltu â'ch swyddfa maes o law i drefnu dyddiad addas ar gyfer y sesiwn.

Er mwyn helpu'r Pwyllgor gyda'i baratoadau, byddwn yn ddiolchgar pe gallech ddarparu gwybodaeth i fynd i'r afael â'r materion a nodir yn Atodiad 1 cyn y sesiwn graffu. Yn amlwg, nid oes rhaid ichi gyfyngu eich ymateb i'r cais hwn, ac mae croeso ichi fynd i'r afael ag unrhyw faterion eraill y byddent, yn eich barn chi, o gymorth i'r Pwyllgor wrth ei waith.

Byddem yn hapus i dderbyn un ymateb cydgysylltiedig, neu os byddai'n well gennych, ymatebion ar wahân yn mynd i'r afael â'r materion o fewn eich meysydd cyfrifoldeb unigol.

Rwyf wedi gofyn i'r tîm Clercio gysylltu â'ch swyddogion ynghylch terfyn amser pendant.

Yn gywir,



Llyr Gruffydd AS,  
Cadeirydd y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

Croesewir gohebiaeth yn Gymraeg neu yn Saesneg. We welcome correspondence in Welsh or English.





## Deddfwriaeth

Sut y mae'r gyllideb ddrafft yn darparu ar gyfer:

- Cyflawni deddfwriaeth newydd ac arfaethedig gan Lywodraeth Cymru.

## Yr amgylchedd

Sut y mae'r gyllideb ddrafft yn darparu ar gyfer:

- Cyflwyno'r Cynllun Gweithredu Adfer Natur, gan gynnwys rheoli a monitro'r Rhwydwaith Safleoedd Cenedlaethol.
- Rhaglen Rhwydweithiau Natur, Lleoedd Lleol i Natur, y rhaglen Gweithredu Mawndiroedd Cenedlaethol a Natur am Byth.
- Datblygu targedau natur sy'n gyfreithiol rwyngol a mecanweithiau monitro.
- Unrhyw ganlyniadau eraill o waith ymchwil manwl Llywodraeth Cymru i fioamrywiaeth a gweithredu cytundeb byd-eang COP15 gyda goblygiadau cyllidebol.
- Gweithredu'r gwaith 'Adferiad Gwyrdd', gan gynnwys y Gwasanaeth Natur Cenedlaethol.
- Bioddiogelwch, gan gynnwys ffliw adar.
- Cyllid a ddaw yn lle cyllid LIFE yr UE.
- Datblygu a chyflwyno Cynllun Dychwelyd Ernes a Chyfrifoldeb Estynedig Cynhyrchwyr.
- Ardaloedd Morol Gwarchoddedig, gan gynnwys cyflawni cynllun gweithredu'r Ardaloedd Morol Gwarchoddedig.
- Ansawdd dŵr, gan gynnwys cefnogaeth i'r tasglu Ansawdd Dŵr Afon Gwell.
- Gweithredu'r Strategaeth Genedlaethol ar gyfer Rheoli Perygl Llifogydd ac Erydu Arfordirol, gan gynnwys y rhaglen Rheoli Perygl Arfordiroedd.

## Newid Hinsawdd

Manylion am y modd y mae dyraniadau'r gyllideb ddrafft yn cefnogi'r canlynol:

- Cyflawni'r polisiâu a'r cynigion yng nghynllun Sero Net Cymru sy'n berthnasol i gylch gwaith y pwyllgor hwn.



- Effaith cyhoeddiadau sero net Llywodraeth y DU ar bolisiau Llywodraeth Cymru a dyraniadau cyllideb i gefnogi sero net.
- Camau ar gyfer i addasu i newid hinsawdd, a manylion dyraniadau penodol i gefnogi'r strategaeth newydd ar wrthsefyll newid hinsawdd (disgwylir yn hydref 2024).
- Gweithredu Strategaeth Coetiroedd i Gymru ac argymhellion y gwaith ymchwil trylwyr i goed a phren yn 2021, gan gynnwys cyflawni'r Goedwig Genedlaethol a chynyddu cyfradd plannu coed.

### Ynni ac effeithlonrwydd ynni

- Cyflenwi ynni adnewyddadwy a rhaglenni effeithlonrwydd ynni'r sector cyhoeddus gan gynnwys Gwasanaeth Ynni Llywodraeth Cymru, y datblygwr ynni adnewyddadwy sy'n eiddo cyhoeddus, ac Ynni Cymru.
- Dyraniadau i gefnogi targedau ynni adnewyddadwy newydd a datblygu'r strategaeth wres.
- Polisiau a rhaglenni i gefnogi datgarboneiddio yn y sector tai, gan gynnwys dyraniadau ar gyfer y Rhaglen Ôl-osod er mwyn Optimeiddio, ac iteriad nesaf y Rhaglen Cartrefi Clyd.

### Trafnidiaeth

- Cyflawni'r polisi terfynau cyflymder 20mya, yn enwedig manylion unrhyw gostau / dyraniadau parhaus.
- Cyflawni'r fasnachfaint rheilffyrdd a blaenoriaethau seilwaith rheilffyrdd Llywodraeth Cymru.
- Cyflwyno Metros Gogledd-ddwyrain Cymru, De-orllewin Cymru a De-ddwyrain Cymru.
- Datblygiad Trafnidiaeth Cymru – gan gynnwys y wybodaeth ddiweddaraf am y gwaith a wnaed i wella proses gyllidebol Trafnidiaeth Cymru yn dilyn ein hadroddiad ar gyllideb ddrafft 2023-24, a dadansoddiad o ddyraniad cyllideb lawn Trafnidiaeth Cymru ar gyfer 2024-25, gan restru ei gyllideb gorfforaethol ochr yn ochr â dyraniadau ar gyfer darparu rhaglenni penodol, yn ogystal ag ymrwymadau masnachfaint rheilffyrdd.
- Buddsoddiad yn y rhwydwaith cefnffyrdd a thraffyrdd a sut mae'r rhain wedi'u llunio gan y datganiad polisi ffyrdd newydd / canlyniad yr adolygiad ffyrdd.
- Cyflawni polisi teithio llesol, gan gynnwys crynodeb o weithgaredd wedi'i gynllunio a bwrdd sy'n nodi cyfanswm a dyraniadau y pen ar gyfer teithio llesol ar gyfer 2024-25, o'i

gymharu â phob un o'r tair blynedd flaenorol. Dylai dyraniadau refeniw a chyfalaf fod yn glir ac yn cael eu dadansoddi gan ffrwd ariannu unigol.

- Cefnogaeth ar gyfer gwasanaethau bysiau a thrafnidiaeth gymunedol, gan gynnwys crynodeb o weithgaredd wedi'i gynllunio a thabl yn manylu ar gyfanswm a dyraniadau y pen ar gyfer 2024-25 o'i gymharu â phob un o'r tair blynedd flaenorol. Dylai dyraniadau refeniw a chyfalaf fod yn glir a dylai'r tabl fod wedi'i ddadansoddi yn ôl ffrwd ariannu unigol.
- Cefnogaeth i ddarpariaeth seilwaith gwefru cerbydau trydan a chyflawni'r strategaeth / cynllun gweithredu. gan gynnwys crynodeb o weithgarwch arfaethedig a thabl yn manylu ar gyfanswm y dyraniadau y pen ar gyfer 2024-25 o gymharu â phob un o'r tair blynedd flaenorol. Dylai dyraniadau refeniw a chyfalaf fod yn glir a dylai'r tabl fod wedi'i ddadansoddi yn ôl ffrwd ariannu unigol.
- Cefnogi blaenoriaethau trafndiaeth lleol.

#### Comisiwn Seilwaith Cenedlaethol Cymru

- Manylion am y dyraniadau cyllideb ar gyfer Comisiwn Seilwaith Cenedlaethol Cymru.

#### Cyfoeth Naturiol Cymru

Manylion am ddyraniadau'r gyllideb ar gyfer Cyfoeth Naturiol Cymru, gan gynnwys

- diweddariad ar 'fwlch ariannu' Cyfoeth Naturiol Cymru, ac
- a yw hwn wedi'i gau o ran ei ddyraniadau sylfaenol.



Dear Climate Change, Environment, and Infrastructure Committee,

We are writing to you to express the importance of including specific financial support for disabled people in the upcoming 2024-2025 budget.

We have all felt the effects of the cost-of-living crisis, but we have not all experienced it equally. We have found that there are disabled people across Wales, forced to live in awful circumstances due to the twin problems of poverty and the cost-of-living crisis. A fifth of the population of Wales is disabled<sup>1</sup> and households containing at least one disabled person is more likely to be living in poverty,<sup>2</sup> disabled people are more likely to be economically inactive or if in work, that work is more likely to be insecure and low wage.<sup>3</sup> Poverty has long been a problem for disabled people living in Wales, but the rising cost-of-living is forcing people into worse and worse circumstances.

The 2023-2024 budget did not provide specific support for disabled people during the crisis and our findings from our report “Barely Surviving the impact of the cost-of-living crisis on disabled people” displays some of the consequences. We found that the financial support available was short-sighted, the cost-of-living payments supporting people to pay one month of bills, but nothing beyond. Disabled people often have more essential costs than non-disabled people, this extra cost of disability has not been accounted for, beyond the support already available.

The consequences are severe. Disabled people reported only being able to eat one meal a day, having to let go of support workers or stop going to vital therapies because of cost, being unable to run access equipment due to costs, in some cases losing their lives.

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<sup>1</sup> Office of National Statistics, Census 2021, “Disability, England and Wales: Census 2021”, 19<sup>th</sup> January 2023, <<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/disabilityenglandandwales/census2021#how-disability-varied-across-england-and-wales>>

<sup>2</sup> Joseph Roundtree Foundation, “UK Poverty 2023 – The essential guide to understanding poverty in the UK”, 20th January (2023), p65, <[https://www.jrf.org.uk/sites/default/files/jrf/uk\\_poverty\\_2023\\_-\\_the\\_essential\\_guide\\_to\\_understanding\\_poverty\\_in\\_the\\_uk\\_0\\_0.pdf](https://www.jrf.org.uk/sites/default/files/jrf/uk_poverty_2023_-_the_essential_guide_to_understanding_poverty_in_the_uk_0_0.pdf)>

<sup>3</sup> Department for Work and Pensions, “Employment of disabled people 2022”, UK Government, 26th January (2023), <https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people2022#labour-market-status>

These have been difficult years to be a disabled person in Wales. We have been living through a mass-disabling coronavirus pandemic, in which disabled people have been disproportionately harmed. Disabled people have disproportionately been impacted by over a decade of austerity policies and with severe changes to their benefit entitlement from the UK Government, this period of financial uncertainty and continued poverty does not look likely to change.

We are calling for the Budget to include a series of recommendations and for certain questions to be asked of what we need and what is missing.

- The Welsh Government, health services and local authorities in Wales should provide specific support for the running and maintenance of disability related equipment, to ensure that all disabled people are not financially impacted by their need to use certain equipment.
- Welsh Government to urgently review its policy on social care charges, including whether the disregards for disability related expenditure are adequately protecting disabled people on low incomes with high costs.
- Urgent action to recognise and tackle mental health issues amongst disabled people, including pathways to accessing appropriate mental health support whether from social care, other areas of the health service and/or through peer support, such as from disabled people's organisations.
- Food subsidies should be considered to reduce the cost of food in shops. To supplement this, the Welsh Government and Local Authorities should provide support to and nurture the creation of community food schemes. These schemes should include accommodation for dietary requirements and include options for access requirements.
- Public transport, such as buses and trains, should be taken under public ownership to be delivered as a public service, including measures such as reduced ticket prices with the eventual goal to make public transport in Wales free.
- Provision of resources and capacity building measures to ensure the establishment and sustainability of at least one Disabled

People's Organisation in every local authority, to support coproduction of policies and services with public bodies, including peer support schemes for disabled people

- Commitment from the Welsh Government to prioritise tackling the extra cost of disability

For more information, please contact

[megan.thomas@disabilitywales.org](mailto:megan.thomas@disabilitywales.org). You can find our full report here:  
<https://www.disabilitywales.org/wp-content/uploads/2023/07/Barely-Surviving-cost-of-living-report.pdf>

Kind regards,

Megan Thomas

Policy and Research Officer

Disability Wales



Ein cyf/Our ref: JJ/PO/356/2023

Llŷr Gruffydd AS  
Cadeirydd  
Y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith  
Senedd Cymru  
Bae Caerdydd  
Caerdydd  
CF99 1SN

20 Hydref 2023

Annwyl Llŷr,

Diolch am eich llythyr dyddiedig 25 Medi 2023 am gyhoeddiad Prif Weinidog y DU ar 20 Medi ynghylch polisiau sero net a'i effeithiau ar ymrwymadau newid hinsawdd Cymru.

Yn fy Natganiad Llafar i'r Senedd, esboniais fod cyhoeddiad Prif Weinidog y DU yn glasddwreiddio'r polisi sero net ac yn dangos diffyg meddwl hirdymor a diffyg dealltwriaeth o gost a manteision arwain y trawsnewid. Mae'r dystiolaeth yn glir. Cynhara'n y byd y gwnawn ni weithredu, isa'n y byd y bydd cost cyrraedd sero net, a mwya'n y byd o fanteision cymdeithasol, amgylcheddol ac economaidd y gwelwn ni. Ar ôl y tywydd eithafol diweddar ledled y byd a'r flwyddyn dwymaf a gofnodwyd erioed, nid dyma'r amser i lasddwreiddio'n hymrwymadau hinsawdd.

Yng Nghymru, rydym wedi datgan ei bod yn argyfwng natur ac yn argyfwng hinsawdd arnom ac rydym wedi ymrwmo i ddelio â hyn trwy amrywiaeth o bolisiau a thrwy ymgysylltu a gweithredu. Ond, ni allwn wneud hyn ar ein pennau ein hunain ac rydym yn dibynnu ar eraill, gan gynnwys Llywodraeth y DU, i chwarae eu rhan. Rwyf wedi galw ar Lywodraeth y DU i gadw at ei thrywydd a'i hymrwymiad i fod yn sero net erbyn 2050. Mae angen ei gilydd ar Lywodraeth y DU a'r Llywodraethau Datganoledig i gyrraedd ein targedau uchelgeisiol ar gyfer yr hinsawdd. Wrth dderbyn newid sy'n arafu'n taith tuag at sero net, rhaid cydbwysu hynny â rhywbeth sy'n lleihau allyriadau. Fel arall, bydd gennym fynydd i'w ddringo yn y dyfodol a bydd y trawsnewid i sero net o bosib yn ddrutach ac yn fwy anghydradd.

Roedd y diffyg ymgynghori ac ymgysylltu â'r Llywodraethau Datganoledig ar gyhoeddiadau'r Prif Weinidog yn dangos gwendid y trefniadau rhynglywodraethol presennol ac nid yw Llywodraeth Cymru wedi cael cyfle eto i asesu effaith lawn y gwanhau hwn ar bolisi.

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[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

Rydym yn croesawu derbyn gohebiaeth yn y Gymraeg. Byddwn yn ateb gohebiaeth Gymraeg sy'n dod i law yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 146  
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Mae Cymru a'r Alban wedi gofyn ar y cyd i'r DU drefnu uwchgynhadledd pedair gwlad dan gadeiryddiaeth ein cynghorwyr statudol, y Pwyllgor Newid Hinsawdd annibynnol, i ystyried effeithiau cyhoeddiad Prif Weinidog y DU i wanhau polisiâu sero net ar dargedau sero net yr holl wledydd sydd wedi rhwymo'n gyfreithiol iddynt.

Rwyf hefyd wedi ysgrifennu at yr Ysgrifennydd Gwladol dros Ddiogelu Ffynonellau Ynni a Sero Net i ofyn yn ffurfiol am ddadansoddiad o effeithiau'r newid polisi ar Gymru. Mae Llywodraeth Cymru yn dal wrthi'n ceisio deall effeithiau'r newid polisi ar feysydd datganoledig a'r meysydd a gedwir yn ôl.

Er enghraifft, er gwaethaf cyhoeddiad Prif Weinidog y DU ar 20 Medi, bydd y Mandad Cerbydau Di-allyriadau, a fydd yn sicrhau bod 80% o geir newydd a 70% o faniau newydd a werthir yn 2030 yn ddi-allyriadau, yn parhau. Er bod hyn yn beth da, mae neges Prif Weinidog y DU i ddiwydiant a'r cyhoedd yn niweidiol a bydd yn gohirio gweithredu pwysig er lles yr economi, cymdeithas a'r amgylchedd.

Datgarboneiddio tai yw un o'n heriau mwyaf. Mae llawer o'r pwerau rheoleiddio yn rhai a gedwir yn ôl, fel y Safonau Gofynnol Effeithlonrwydd Ynni, sy'n pennu lefel isaf effeithlonrwydd ynni ar gyfer eiddo domestig rhentu preifat. Ond rydym yn defnyddio'r pwerau prin sydd gennym mewn sawl ffordd. Trwy Gynllun Prydlesu Cymru a'r Rhaglen Ôl-osod er mwyn Optimeiddio, rydym yn sicrhau bod grantiau ar gael i wneud cartrefi yn fwy ynni-ffeithiol i ennill gradd EPC o C, a fydd yn helpu i leihau biliau i denantiaid incwm is. Yn y sector perchen-feddianwyr a'r sector rhentu preifat, bydd y Rhaglen Cartrefi Cynnes newydd yn cyflymu'r newid o foeleri nwy ac olew i ddyfeisiau amgen carbon isel.

Cyhoeddodd y Pwyllgor Newid Hinsawdd (CCC) eu [hasesiad lefel uchel](#) eu hunain o'r newidiadau ar 12 Hydref gan annog "y Llywodraeth i fod yn fwy agored wrth ddiweddarau ei dadansoddiadau pan fydd yn gwneud cyhoeddiadau mawr". Er eu bod yn cydnabod nad oes ganddyn nhw ddigon o wybodaeth i allu asesu effeithiau llawn rhai o'r mesurau polisi sy'n cael eu cynnig, daeth y CCC i'r casgliad, er bod penderfyniadau diweddar fel y gefnogaeth i ddatgarboneiddio dur ym Mhort Talbot yn gadarnhaol, bod pryderon o hyd nad yw Llywodraeth y DU ar y trywydd iawn i gyrraedd ei thargedau, gan nodi:

- Er bod 2035, sef y dyddiad newydd ar gyfer rhoi'r gorau i foeleri ffosil, o bosibl yn gydnaws â sero net, bydd eithrio 20% o aelwydydd o'r broses yn cael effaith ar allyriadau gydol y cyfnod hyd at 2050 - gan wneud sero net yn llawer anoddach i'w gyrraedd.
- Dim ond effaith uniongyrchol fach ar allyriadau'r dyfodol y bydd gohirio hyd at 2035 y dyddiad gwahardd ceir ffosil yn ei chael.

Bydd Llywodraeth Cymru yn dal i bwysu ar Lywodraeth y DU i gyhoeddi dadansoddiad o effeithiau'r newid polisi, yn enwedig ei effaith ar Gymru. Byddwn ninnau hefyd yn ceisio deall effaith y newidiadau hyn ar Gymru, hyd yn oed heb eglurhad na thystiolaeth gan Lywodraeth y DU.

Yn gywir,



**Julie James AS/MS**

Y Gweinidog Newid Hinsawdd  
Minister for Climate Change





Ein cyf/Our ref: LJCC/HID

Huw Irranca-Davies AS,  
Cadeirydd y Pwyllgor Deddfwriaeth, Cyfiawnder a'r  
Cyfansoddiad

23 Hydref 2023

Annwyl Huw,

Rwy'n ysgrifennu mewn ymateb i'ch llythyr dyddiedig 29 Medi, ynghylch y Protocol sy'n diwygio'r Confensiwn Rhyngwladol ar Gadwraeth Tiwna'r Iwerydd (ICCAT), a elwir hefyd yn "Brotocol Palma".

Fel y nodwch, mae cysylltiadau rhyngwladol, gan gynnwys gwaith yr ICCAT, yn fater a gedwir yn ôl. Fodd bynnag, rwy'n cytuno bod rheoli rhywogaethau ICCAT, yn enwedig Tiwna Asgell Las, sy'n fwyfwy cyffredin yn nyfroedd Cymru, yn fater i'm Llywodraeth. Yn y cyd-destun hwn, gwnaethom gytuno â DEFRA y dylid mabwysiadu'r Protocol gan fod y diwygiadau a ddisgrifiwch yn welliannau i weithrediad y Confensiwn.

Fe wnaethoch chi ofyn am ragor o wybodaeth ynghylch y canlynol:

- *yr ymgysylltiad rhynglywodraethol a ddisgrifir yn y Memorandwm Esboniadol*

Roedd Protocol Palma yn destun trafodaeth ar lefel swyddogion ac yn dilyn cyngor cyfreithiol, daethpwyd i'r casgliad bod y diwygiadau i'r Protocol yn peri ychydig iawn o bryder i'r DU neu ddim o gwbl, yn enwedig oherwydd iddynt gael eu hadolygu cyn i'r DU arwyddo ar ran yr holl Weinyddiaethau.

- *pa drefniadau mewnol sydd ar waith i fonitro, arsylwi a gweithredu argymhellion Comisiwn y Protocol mewn meysydd datganoledig.*

Fel parti contractio i ICCAT, mae'n ofynnol i'r DU ddeddfu deddfwriaeth i roi effaith i weithrediad domestig y Confensiwn. Cafodd rhai adrannau o ddeddfwriaeth yr UE eu cadw wrth i'r DU ymadael â'r UE yn hyn o beth. Mae swyddogion yn ein His-adran Pysgodfeydd yn gyfrifol am fonitro, arsylwi a gweithredu rheoliadau o'r fath. Yn dilyn Brexit, rhoddwyd

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[Correspondence.Mark.Drakeford@gov.wales](mailto:Correspondence.Mark.Drakeford@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn y Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 148  
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Fframwaith y DU ar waith ar gyfer rheoli pysgodfeydd, gan nodi rhyngweithiad cymwyseddau a gedwir yn ôl a chymwyseddau datganoledig. Mae'r fframwaith yn nodi sut y bydd llywodraethau'r DU yn rhyngweithio yn y maes polisi hwn ac yn cael ei gyhoeddi yn:

<https://www.gov.uk/government/publications/fisheries-management-and-support-provisional-common-framework>

- *eich asesiad ynghylch a oes angen cymryd unrhyw gamau, gan gynnwys gwneud newidiadau, ar hyn o bryd i sicrhau bod Cymru'n cydymffurfio â'r diwygiadau a wnaed gan y Protocol mewn meysydd datganoledig.*

Fel y nodwch, mae'r Protocol yn diwygio cwmpas yr ICCAT, yn ogystal â gwella'r ffordd y mae'r Comisiwn yn gweithredu. Mae hefyd yn mewnosod amcanion newydd ar gyfer partiön contractio, ac mae'r rhain yn cyd-fynd â'r Amcanion Pysgodfeydd a nodir yn Neddf Pysgodfeydd 2020. Ni fyddai unrhyw gamau inni eu cymryd ar unwaith i weithredu'r Protocol.

Dylid nodi, dim ond pan fydd tri chwarter partiön contractio ICCAT yn ei gadarnhau, y mae'r Protocol yn dod i rym. O ystyried bod cadarnhad y DU yn dod â'r cyfanswm i ddim ond 6 o 52 o bartiön contractio, mae unrhyw ddarpariaethau a ddatblygwyd o ganlyniad i'r newidiadau a wneir gan y Protocol gryn dipyn i ffwrdd o'r angen i weithredu arnynt.

Yn gywir,



**MARK DRAKEFORD**



Llywodraeth Cymru  
Welsh Government

Ein cyf/Our ref: JJ/PO/365/2023

Llŷr Gruffydd MS  
Cadeirydd y Pwyllgor Newid Hinsawdd, Amgylchedd a Seilwaith  
Senedd Cymru  
Bae Caerdydd  
Caerdydd  
CF99 1SN

27 Hydref 2023

Annwyl Llŷr,

## Bil Seilwaith (Cymru)

Yn ystod y sesiwn dystiolaeth yng nghyfarfod y Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith ar 18 Hydref, cytunais i ysgrifennu at y Pwyllgor i ddarparu rhagor o wybodaeth ac eglurhad ynghylch sut y bydd y broses cydsynio seilwaith arfaethedig yn ystyried barn cymunedau arfordirol ar ddatblygiadau arfaethedig yn yr ardal forol.

Mae adran 33 o Fil Seilwaith (Cymru) yn nodi pwy sy'n cael eu hysbysu am gais ar dir ac yn ardal morol Cymru. Mae adran 35 yn nodi sut mae awdurdod cynllunio i ymateb i hysbysiad o'r fath. O dan y ddarpariaeth hon, rhaid i awdurdod cynllunio gyflwyno adroddiad ar yr effaith leol pan fydd yn cael ei hysbysu am gais am gydsyniad seilwaith yn ei ardal. Fodd bynnag, pan roddir hysbysiad i awdurdod am gais yn yr ardal forol, nid oes dyletswydd i ddarparu adroddiad ar yr effaith leol, er ei fod yn gallu cyflwyno adroddiad o'r fath os yw'n dymuno.

Y rheswm rwyf wedi dewis peidio â gosod dyletswydd ar awdurdodau cynllunio i gyflwyno adroddiad ar yr effaith leol ar gyfer datblygu yn yr ardal forol yw, yn wahanol i ddatblygiad ar dir, nid oes unrhyw ffiniau daearyddol clir ar gyfer awdurdodau cynllunio yn yr amgylchedd ar y môr. Mae hyn yn golygu ei bod yn anodd cyfiawnhau ei gwneud yn ofyniad gorfodol i awdurdodau cynllunio ddarparu adroddiad ar yr effaith leol, lle na fydd datblygu'n cael llawer o effaith ar ei ardal, os o gwbl.

At hynny, bwriedir i adroddiadau ar yr effaith leol fod yn ddogfennau ffeithiol, sy'n nodi unrhyw wybodaeth berthnasol a allai gael effaith ar ddatblygiad arfaethedig. Er enghraifft, gall hyn gynnwys hanes cynllunio'r tir, unrhyw ddynodiadau lleol ac unrhyw bolisiau cynllunio sy'n berthnasol yn lleol. Nid ydynt wedi'u cynllunio i fod yn ddull penodol o gasglu sylwadau a safbwyntiau gan gymunedau lleol.

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[Correspondence.Julie.James@gov.Wales](mailto:Correspondence.Julie.James@gov.Wales)

Rydym yn croesawu derbyn gohebiaeth yn y Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Tudalen y pecyn 150  
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Bydd datblygu ar y môr yn ddarostyngedig i'r un gofynion cyhoeddusrwydd a hysbysu â'r rheini ar gyfer datblygu tir, er y bydd y dulliau a ddefnyddir yn amrywio ychydig. Er enghraifft, ni fyddai'n bosibl arddangos hysbysiad safle ar y môr.

Bydd hyn yn helpu i sicrhau y bydd cymunedau arfordirol yn cael yr un cyfleoedd i adolygu datblygiad arfaethedig a chyflwyno sylwadau yn ei gylch ag unrhyw randdeiliaid a chymunedau lleol eraill.

Rwyf hefyd wedi ymrwmo i weithio'n agos gyda rhanddeiliaid i ddatblygu'r gofynion penodol ar gyfer sut y mae rhaid cynnal ymgynghoriadau er mwyn sicrhau bod cynifer o bobl â phosibl yn cael cyfle i gymryd rhan yn y broses.

Os oes angen eglurhad pellach arnoch ynglŷn â'r mater hwn, byddwn yn hapus i ysgrifennu at y Pwyllgor eto.

Yn gywir,



**Julie James AS/MS**  
Y Gweinidog Newid Hinsawdd  
Minister for Climate Change



Llywodraeth Cymru  
Welsh Government

Llŷr Gruffydd AS  
Cadeirydd,  
Y Pwyllgor Newid Hinsawdd, Amgylchedd a Seilwaith  
Senedd Cymru  
[SeneddClimate@senedd.wales](mailto:SeneddClimate@senedd.wales)

30 Hydref 2023

Annwyl Llŷr,

## **Rheoliadau Rheolaethau Swyddogol (Iechyd Planhigion) (Hysbysiad Blaenorol) a Rheoliadau Amodau Ffytioechydol (Diwygio) 2023.**

Rwy'n cyfeirio at fy llythyr atoch dyddiedig 28 Medi 2023. Hoffwn hysbysu'r Pwyllgor fy mod wedi cydsynio i'r Ysgrifennydd Gwladol osod Rheoliadau Rheolaethau Swyddogol (Iechyd Planhigion) (Hysbysiad Blaenorol) a Rheoliadau Amodau Ffytioechydol (Diwygio) 2023 mewn perthynas â Chymru. Rwyf wedi gosod Datganiad Ysgrifenedig sydd i'w weld [yma](#).

Mae'r Rheoliadau yn gorgyffwrdd â pholisïau datganoledig a byddant yn gymwys i Gymru. Mae'r Rheoliadau yn cwmpasu Cymru, Lloegr a'r Alban. Bu'r Offeryn Statudol yn ddarostyngedig i'r weithdrefn negyddol a chafodd ei osod gerbron Senedd y Deyrnas Unedig ar 26 Medi 2023. Y dyddiadau cychwyn fydd 17 Tachwedd 2023, 24 Tachwedd 2023 a 2 Mai 2024.

Er mai egwyddor gyffredinol Llywodraeth Cymru yw y dylai'r gyfraith sy'n ymwneud â materion datganoledig gael ei gwneud a'i diwygio yng Nghymru, y tro hwn, ystyriwyd ei bod yn briodol i'r Rheoliadau gael eu gosod gan Lywodraeth y DU. Mae'r Rheoliadau'n ymwneud â maes datganoledig, fodd bynnag, maent yn effeithio ar fewnforio cynhyrchion planhigion a phlanhigion ledled Prydain. Mae llawer o'r newidiadau yn y Rheoliadau yn ymwneud â mewnforio planhigion a chynhyrchion planhigion.

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[Correspondence.Lesley.Griffiths@gov.wales](mailto:Correspondence.Lesley.Griffiths@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Mae'r rhan fwyaf o'r nwyddau hyn sy'n dod i mewn i Gymru yn dod trwy borthladdoedd Lloegr a byddent yn ddarostyngedig i'w deddfwriaeth mewnforio. Gall cyflwyno rheoliadau ar wahân yng Nghymru a Lloegr achosi baich ychwanegol ar yr Asiantaeth Iechyd Anifeiliaid a Phlanhigion (APHA), busnesau, masnachwyr a thyfwyr. Mae rheoleiddio ar draws Prydain yn sicrhau llyfr statud cydlynol a chyson gyda'r rheoliadau ar gael mewn un offeryn heb unrhyw risg o ymwahanu deddfwriaethol ym Mhrydain Fawr. Yn ogystal, mae'n debygol y byddai gwneud Rheoliadau Cymru yn unig ar gyfer rhai darpariaethau o fewn y Ddeddf hon yn cael goblygiadau ar gyfer diwygio a chydgrynhoi deddfwriaeth iechyd planhigion yn dilyn cymhathu Bil REUL ar ddiwedd 2023, yn ogystal â chael goblygiadau ar gyfer rhoi gwybod i Sefydliad Masnach y Byd (WTO) am y newidiadau.

Rwyf wedi ysgrifennu llythyr tebyg ar Huw Irranca-Davies AS, Cadeirydd y Pwyllgor Deddfwriaeth, Cyfiawnder a'r Cyfansoddiad (LJCC).

Yn gywir,

A handwritten signature in black ink that reads "Lesley Griffiths". The signature is written in a cursive, flowing style.

**Lesley Griffiths AS/MS**  
**Y Gweinidog Materion Gwledig a Gogledd Cymru, a'r Trefnydd**  
**Minister for Rural Affairs and North Wales, and Trefnydd**

Llyr Gruffydd AS,  
Cadeirydd Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith

Paul Davies AS,  
Cadeirydd Pwyllgor yr Economi, Masnach a Materion Gwledig

John Griffiths AS,  
Cadeirydd y Pwyllgor Llywodraeth Leol a Thai

2 Tachwedd 2023

Annwyl bawb,

### Y Bil Ffyniant Bro ac Adfywio

Hoffem dynnu eich sylw at yr **ohebiaeth** a gawsom ar 17 Hydref gan y Gweinidog Newid Hinsawdd mewn ymateb i'n **hadroddiad** ynghylch y Memorandwm Cydsyniad Deddfwriaethol Atodol (Memorandwm Rhif 4) ar y Bil Ffyniant Bro ac Adfywio.

Efallai y bydd y paragraff a ganlyn yn llythyr y Gweinidog, mewn ymateb i Argymhellion 8 a 10 yn ein hadroddiad, o ddiddordeb penodol ichi:

*"Nid oes i'r Bil Ffyniant Bro ac Adfywio unrhyw oblygiadau uniongyrchol i'r dyletswyddau ar Lywodraeth Cymru yn Neddf Llesiant Cenedlaethau'r Dyfodol. Fodd bynnag, mae'n creu tirlun polisi a allai beri dryswch o gofio ein bod wedi pennu'r nodau llesiant hirdymor i Gymru gyda dangosyddion cysylltiedig a cherrig milltir cenedlaethol gan edrych at 2050. Mae gan gyrff cyhoeddus ddyletswydd o dan Ddeddf Llesiant Cenedlaethau'r Dyfodol a byddem yn disgwyl iddynt gyflawni eu dyletswyddau cyfreithiol a llunio a chyflawni amcanion llesiant sy'n cyfrannu at gyflawni nodau llesiant Cymru."*

Yn gywir,



*Huw Irranca-Davies*

Huw Irranca-Davies

Cadeirydd



Julie James AS,  
Y Gweinidog Newid Hinsawdd

2 Tachwedd 2023

Annwyl Julie,

Y Bil Ffyniant Bro ac Adfywio

Diolch am eich llythyr dyddiedig 17 Hydref mewn ymateb i'n hadroddiad ynghylch y Memorandwm Cydsyniad Deddfwriaethol Atodol (Memorandwm Rhif 4) ar y Bil Ffyniant Bro ac Adfywio.

Mae gennym rai cwestiynau dilynol ac mae'r rhain wedi'u nodi yn yr Atodiad i'r llythyr hwn. Byddem yn ddiolchgar pe gallech ymateb erbyn 22 Tachwedd 2023. Rwy'n anfon copi o'r llythyr hwn at Gadeirydd Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith, Cadeirydd Pwyllgor yr Economi, Masnach a Materion Gwledig a Chadeirydd y Pwyllgor Llywodraeth Leol a Thai.

Yn gywir

*Huw Irranca-Davies*

Huw Irranca-Davies

Cadeirydd

**Cwestiwn 1:** Byddem fel arfer yn disgwyl ymateb gan Lywodraeth Cymru i ddatgan a yw'n derbyn neu'n gwrthod argymhelliad Pwyllgor. Er ei bod yn bosibl canfod bwriad Llywodraeth Cymru o ran rhai argymhellion, nid yw hynny'n bosibl o ran rhai eraill. A fyddech cystal â'n helpu drwy nodi'n glir ar gyfer y cofnod pa argymhellion rydych yn eu derbyn a pha rai nad ydych yn eu derbyn, gan ddarparu unrhyw wybodaeth ychwanegol fel y bo angen?

**Cwestiwn 2:** Nid oedd eich ymateb yn mynd i'r afael ag argymhelliad 7 yn uniongyrchol. O ganlyniad, cododd Aelodau'r Pwyllgor hyn ddwywaith yn ystod y **ddadl** ynghylch cydsyniad deddfwriaethol (paragraffau 346 a 380 o Gofnod y Trafodion) ond ni fanteisiwyd ar y cyfle hwnnw. Felly, byddem yn ddiolchgar pa gallech ddatgan a yw Llywodraeth Cymru yn parhau i fod o'r farn bod Rhan 1 o'r Bil "yn cynrychioli ymyrraeth amhriodol yng nghymhwysedd deddfwriaethol y Senedd".

**Cwestiwn 3:** Roedd eich ymateb cyfunol i argymhellion 12 a 13 yn ystyried y materion yn yr argymhellion hynny mewn termau eang iawn. Byddem yn ddiolchgar pe gallech roi ymateb manylach, gan roi'r wybodaeth benodol y gofynnwyd amdani yn argymhellion 12 a 13, yn unol â'r dyddiad cau a bennwyd yn argymhelliad 14. Gwelwn fod y materion perthnasol o bwys sylweddol i'r Senedd, nid yn unig oherwydd y pryderon a fynegwch ym mharagraffau 93 i 103 a pharagraff 111 o'r **Memorandwm Cydsyniad Deddfwriaethol Atodol (Memorandwm Rhif 4)**.

**Cwestiwn 4:** Rydym yn gofyn am eich cymorth ychwanegol gydag argymhelliad 18, nad ydym yn teimlo ei fod wedi cael ymateb digonol. Nid ydym yn teimlo bod unrhyw rai o'r memoranda cydsyniad deddfwriaethol yn rhoi lefel briodol o fanylion ynghylch cwrpas y pwerau gwneud rheoliadau y mae'r Bil hwn, sy'n mynd drwy Senedd y DU, yn eu darparu i Weinidogion Cymru. Nodwn hefyd eich bod yn datgan yn eich ymateb i argymhelliad 18 fod rhagor o fanylion yn cael eu rhoi yn yr ymateb i argymhelliad 22, ond nid yw'r manylion hynny'n amlwg. Felly, byddem yn ddiolchgar pe gallech roi'r wybodaeth y gofynnwyd amdani ym mhwynt bwled cyntaf argymhelliad 18.

**Cwestiwn 5:** Yng ngoleuni eich ymateb i argymhelliad 18, byddai'n ddefnyddiol deall pam rydych wedi cymryd pwerau i wneud rheoliadau drwy Fil gan Lywodraeth y DU pan nad yw'n ymddangos eto eich bod wedi ystyried sut rydych yn bwriadu defnyddio'r pwerau hyn neu pryd y byddwch yn eu defnyddio.

**Cwestiwn 6:** Yng ngoleuni eich ymateb i argymhelliad 18, a allwch nodi pryd rydych yn bwriadu cyflawni'r ymrwymiad y cyfeiriwch ato, ac felly pryd y byddwch mewn sefyllfa i roi ymateb i ail a thrydydd pwyntiau bwled argymhelliad 18?

**Cwestiwn 7:** Nid yw argymhelliad 22 wedi cael ymateb digonol yn ein barn ni, yn enwedig gan nad oedd y memoranda cydsyniad deddfwriaethol amrywiol yn tracio newidiadau yn rhifau'r cymalau wrth i'r Bil basio drwy Senedd y DU. Felly, a allwch roi'r wybodaeth y gofynnwyd amdani? Dylai'r

wybodaeth fod ar wahân i'r Nodiadau Esboniadol (os caiff y Bil y Cydsyniad Brenhinol) o ystyried nad yw'r Nodiadau hynny'n debygol o sôn am y berthynas â deddfwriaeth bresennol Cymru (megis *Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015*) ac er mwyn rhoi gwybodaeth agored, dryloyw a hygyrch i'r Senedd a rhanddeiliaid Cymru.

**Cwestiwn 8.** Yn ystod y ddadl, dywedoch:

*"Cawsom sgysiau hir gyda Gweinidogion Llywodraeth y DU ynghylch sut y gallem ni ddiogelu sefyllfa Senedd Cymru a Llywodraeth Cymru o ran gorfod ystyried ein materion arni. Rwy'n fodlon wrth orfod ysgrifennu adroddiad i Senedd y DU sy'n nodi pam mae gennym broblem—oherwydd dyna'r unig reswm pam y bydden nhw'n ei wneud; pe na bai gennym broblem, ni fyddai yna adroddiad o'r fath—byddai'n rhaid iddyn nhw eu hunain fynd trwy broses a fyddai'n gwneud iddyn nhw feddwl pam nad oedden nhw'n gallu edrych ar hynny, ac, wrth gwrs, mae'n amlygu hynny i graffu seneddol. Rwy'n credu ei bod yn debyg y byddem yn gallu datblygu proses debyg yma a fyddai'n ein galluogi i fynegi barn arni. Nid yw'n berffaith, rwy'n cytuno'n llwyr, ond mae'n llawer gwell na lle y dechreuon ni, ac os na wnawn ni hyn, bydd gennym **fwlch yn ein deddfwriaeth**, sy'n llawer gwaeth. Rwy'n derbyn ei fod yn gyfaddawd."* [Cofnod y Trafodion, paragraff 404, ein pwyslais ni]

A allech chi roi rhagor o fanylion am y canlynol:

- y "proses debyg" y cyfeiriwch ati a beth allai hynny ei olygu?
- y bwlch penodol yn neddfwriaeth Cymru sydd bellach yn cael ei lenwi?



Mae cyfyngiadau ar y ddogfen hon