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The Objects of the Society, as registered with the Charities Commission.

1. To promote, for the benefit of local communities, and the wider public, measures which will sustain or enhance the landscape, natural beauty, biodiversity, archaeology, scientific interest and cultural heritage of the Cambrian Mountains.
2. To advance the education of the public in the landscape, natural beauty, biodiversity, archaeology, scientific nature, cultural heritage and geodiversity of the Cambrian Mountains.

The Society operates in; Ceredigion, Powys and Carmarthenshire.

6th November 2020

TO: Lesley Griffiths MS, Minister for Environment, Energy and Rural Affairs.

Email: Correspondence.Lesley.Griffiths@gov.wales

- Copies to:
- 1) Clare Pillman, CE Natural Resources Wales,
c/o – nrwboardsecretariat@naturalresourceswales.gov.uk
 - 2) Martin Buckle, Chair of Flood and Coastal Erosion Committee within WG
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The Cambrian Mountains' role in Flood Mitigation.

Minister

The Trustees of the Cambrian Mountains Society [CMS] would like to take this opportunity to comment on Welsh Government's [WG] recently published, **National Strategy for Flood and Coastal Erosion Risk Management in Wales/Oct. 2020 (FCERM)** [the Strategy]. Whilst the Strategy covers many aspects of flood risk management in this letter CMS would like to concentrate on what part the Cambrian Mountains, as well as other upland massifs with similar terrain, play in alleviating flood risk.

The Cambrian Mountains are in fact made up of three distinct upland blocks, from north to south;

- **Pumlumon** - holding the sources of two major rivers, the Hafren (Severn), and Gwy (Wye) as well as the Rheidol,
- **The Elenydd** -source of the Teifi in addition to several tributaries of the Gwy including the Elan,
- **Mynydd Mallaen** in the south - with the headwaters of the Tywi (the longest river flowing entirely in Wales).

Pumlumon alone, is a considerable catchment, covered in large areas of blanket bog and forest, together acting as a sponge for the high rainfall across the area. No wonder that for many years the UK Centre for Ecology and Hydrology [UKCEH] has had a major research project based on this important catchment.

The Elenydd, a huge upland block, sometimes referred to as ‘the green desert.’ Again, a combination of expansive blanket bog, bordered by coniferous plus native deciduous woodland. In this block we also must not forget Dwr Cymru’s reservoirs such as the Elan Valley system and Llyn Brianne.

Mynydd Mallaen is a large upland dome clothed in a tapestry of water retaining; heath, unimproved grassland and blanket bog.

All told these three upland areas, collectively the Cambrian Mountains, offer enormous scope for Natural Flood Management (NFM). The Cambrian Mountains already stand as an exemplar model of, “.....**working with natural processes and identifying opportunities for Natural Flood Management (NFM) to reduce flood risk**”¹ With further investment from WG, via Natural Resources Wales [NRW], these hills could make an ever larger contribution in reducing Fluvial Flooding downstream both in Wales and in England (around the lower reaches of the Severn and Wye). Indeed, further investment offers a perfect opportunity for seeking Payment for Ecosystem Services (PES) through the Government in Westminster and/or insurance companies contributing to the maintenance of the Welsh Uplands in order to mitigate flood risk in Hereford and Gloucester.

How WG investment in the Cambrian Mountains could increase their NFM capacity.

FIRSTLY, CMS suggests that WG, probably via NRW and FCERM grant funding² invest in further projects linked to NFM in the Cambrians such as the three ongoing schemes below

- ✓ the rewetting of blanket bogs by Montgomeryshire Wildlife Trust on Pumlumon,
- ✓ one of the Welsh Peatland Management Schemes (SMS) – a project being run by the National Trust on the blanket bogs of Abergwesyn Common,
- ✓ leaky dam building by NRW on the Afon Merin, a tributary of the Rheidol within the Myherin Forest near Devils Bridge.

The three instances above sit well with - **“A key priority of this Strategy is to deliver more natural interventions and catchment approaches to help improve environmental, social and economic resilience.”**³ Not only that but the same paragraph later refers to implementing NFM in alignment with WG’s Natural Resources Policy of moving toward a low carbon based economy. The Cambrian Mountain’s blanket bogs, in addition to acting as a huge rainwater sponges, also have the potential to sequester enormous amounts of carbon. Whilst Fig.14⁴ of the Strategy hints at what measures upper catchments might furnish in terms of NFM it by no means shows their full potential.

SECONDLY, To help establish further NFM schemes as well as showcase the many other ecosystem services that the Cambrian Mountains quietly make toward the wellbeing of the people of Wales CMS again urges that WG bring these hills into the worldwide family of Protected Areas, as defined by the International Union for the Conservation of Nature [IUCN]. (Currently the three Welsh National Parks and five Areas of Outstanding Natural Beauty enjoy Level V IUCN backing. One of the IUCN objectives for Level V Protected Landscapes is* – “to provide natural products and environmental services.”)

Whilst CMS appreciate that WG in implementing the two recommendations above would not entirely solve the problem of downstream fluvial flooding, it is the Society’s opinion that they would greatly help in fulfilling **The Aim of the National Strategy - To reduce the risks to people and**

communities from flooding and coastal erosion. The recommendations would certainly help in furthering Measure 14 under Objective B of the Strategy that ***“Welsh Government will work cross policy to ensure NFM is considered in wider land and water management including agriculture and in NRW Area Statements.”***⁵ On from this CMS suggest that NFM should also be incorporated into the evolving National Development Framework (NDF). In the Society’s latest response to the NDF (to the WG committee scrutinising the Framework) it has suggested that a true spatial plan must take as much account of the Nation’s outstanding landscapes as it does of the built environment. In this the Society includes those landscapes’ contribution to NFM.

Minister, CMS Trustees look forward to hearing your views as to the Society’s recommendations on how the Cambrian Mountains might play their part in flood alleviation to both neighbouring and coastal communities. The Trustees are also very willing to expand on their ideas with you at any time.

Yours



Mr. Peter Foulkes, on behalf of the Trustees of the Cambrian Mountains Society.

References to paragraphs/pages within the Strategy cited in this letter;

1. from paragraph 21, page 6 of the Strategy.
2. referring to paragraph 229, page 36.
3. from paragraph 226, page 35.
4. “Catchment Diagram” page 35.
5. from page 38.

Other Reference cited,

- * <https://www.iucn.org/theme/protected-areas/about/protected-area-categories>