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Wales

Summary of responses to the updated Dee and Western Wales River Basin Management Plan Consultation

July 2015

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1 Background

Natural Resources Wales is the Competent Authority for implementation of the Water Framework Directive (WFD) in Wales. We have responsibility for drawing up the River Basin Management Plans (RBMPs) - working in partnership with a wide range of public, private and voluntary organisations.

The Water Framework Directive establishes new and better ways of protecting and improving rivers, lakes, groundwater, transitional and coastal waters. The WFD is based on a six-yearly cycle of planning, action and review called River Basin Management Planning.

Consultation on the draft River Basin Management Plans

The first river basin management plans (RBMPs) were published in 2009. They outlined what would be done to protect and improve rivers, lakes, estuaries, coastal and ground waters over a six year period to 2015.

Natural Resources Wales published for six months the draft final RBMPs (Dee and Western Wales) for consultation on the 10th October 2014. It was published alongside our consultation on the draft Flood Risk Management Plans, in order to join up and identify where there are mutual benefits that will deliver more for the environment. The draft Flood Risk Management Plan consultation closed on the 31st January and the summary of response document has now been published on our website

The final RBMPs will be published on the 22nd December 2015.

The RBMPs set out detailed proposals for improving the water environment for the next six years and beyond. We have worked closely with the Environment Agency to produce the Dee RBMP and will continue to do so throughout the implementation phase. We have also worked closely with the Environment Agency who lead on the production of the Severn RBMP.

The draft plans described the main issues for the River Basin Districts and highlight key actions proposed for dealing with them. A supporting technical annex and catchment summaries gave more detail on the current state of waters, the actions proposed and the mechanisms that can be used to drive these actions.

We worked with the River Basin District Liaison Panels to develop the updated draft RBMPs and to promote the consultation. The liaison panels include representatives from businesses, water industry, local authorities, planning authorities, environmental organisations, navigation, fishing and recreation bodies, all with key roles in putting the plan into action.

This summary provides an overview of the responses with the headline themes to the consultation. Responses from the consultation will be used to further develop the final RBMP and their delivery.

River Basin Management Plan Consultation - Promotion and engagement

In Wales, we promoted the consultation in the following ways:

- **Catchment Workshops**

As part of our ongoing engagement work to develop the draft second cycle RBMPs, Natural Resources Wales held a series of 16 catchment workshops across Wales. The Severn Uplands workshop was arranged jointly with the Environment Agency. The Wye workshop was arranged by the Wye and Usk Foundation and three workshops were arranged by the Welsh Dee Trust. The workshops were based on the management catchments identified in the Challenges and Choices consultation¹ and helped to explore with our partners how we can work together at a local scale. The Catchment Summaries were the outputs from the workshops and supported the draft RBMP. The summaries were intended to be a practical guide to aid the delivery of locally targeted actions and partnerships.

- **Website**

The consultation was published for the Dee and Western Wales River Basin Districts on our website. The Severn Consultation was led by the Environment Agency and a link to the Environment Agency's website was included on our website.

- **Stakeholder Mail Out**

At the start of the consultation, an email was sent to 658 stakeholders from all sectors as well as individuals and those who attended the 16 catchments workshops in 2014. We reached 115 more stakeholders than we did for the Challenges and Choices consultation in 2013, both as a result of the catchment workshops and requests to be added to our circulation list.

- **Social Media**

Through social media, we issued tweets, it is estimated that 4261 twitter followers have read the tweets.

- **Statutory Adverts**

Adverts were placed in the Western Mail and Daily Post with a combined coverage for Wales' river basin districts of over 50,000 people.

- **Liaison Panels**

The Liaison Panels have supported us by contributing to the development of the consultation and promoting the consultation to their networks.

- **Sector specific meetings**

The consultation was promoted and shared at a total of 62 various national and local workshops sector meetings/workshops in locations across Wales, 16 of these were national meetings. Events included the Lakes Conference, Energy UK Forum, Wales Land Management Forum, Marine Strategy Framework Directive Workshop, National Access Forum, Pembrokeshire Coastal Forum, Mine Waters Conference, Wales Environment Link, Wales Shellfish Forum, Bangor Mussel Producers, Wales Water

¹ Natural Resources Wales Challenges and Choices consultation document 2014

Industry Forum, Welsh Government Stakeholder Forum Group, Trade Liaison event as well as local fisheries groups and wildlife trusts. A total of 1,082 people attended the meetings and events. Further details are attached in Appendix 1.

- **Existing networks**

Using existing networks at a Wales-wide level and local level – both internally and externally.

- **Living Waters for Wales Update**

This is our external newsletter update that is communicated to the stakeholders mentioned above. The update captures stories of those groups/organisations that are delivering improvements to the water environment.

2. Summary of Responses and Headline Themes

In Wales, of the 100 responses received, there were five at an all Wales level, 29 for the Dee River Basin District and 66 for Western Wales. The responses for the Welsh part of the Severn will form part of the response document produced by the Environment Agency in consultation with Natural Resources Wales. A list of respondents can be found in Appendix 2.

The respondents have been grouped into sectors;

- Academia
- Agriculture and Rural Land management
- Angling and Fisheries
- Business and Industry
- Forestry
- Local Authorities
- Mining and Quarrying
- Navigation
- Conservation and Recreation
- Water Industry
- Individuals

The figures below shows the proportion by sector of the number of responses received.

Figure 1 - All Wales responses

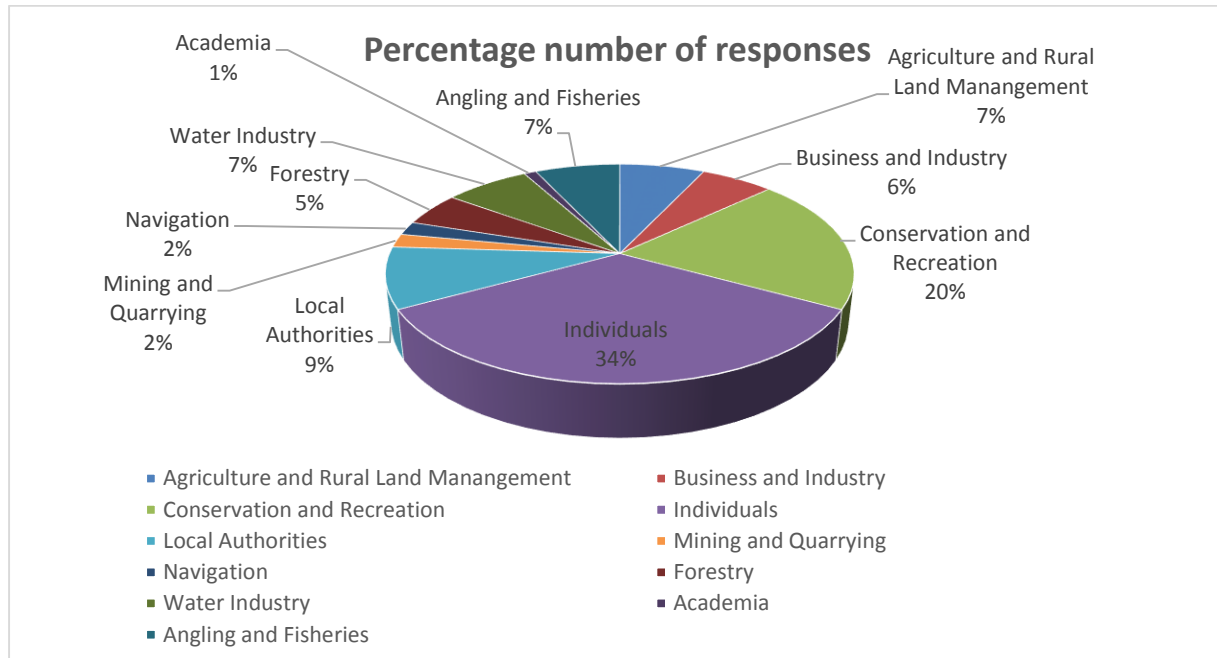


Figure 2 – Dee RBD responses

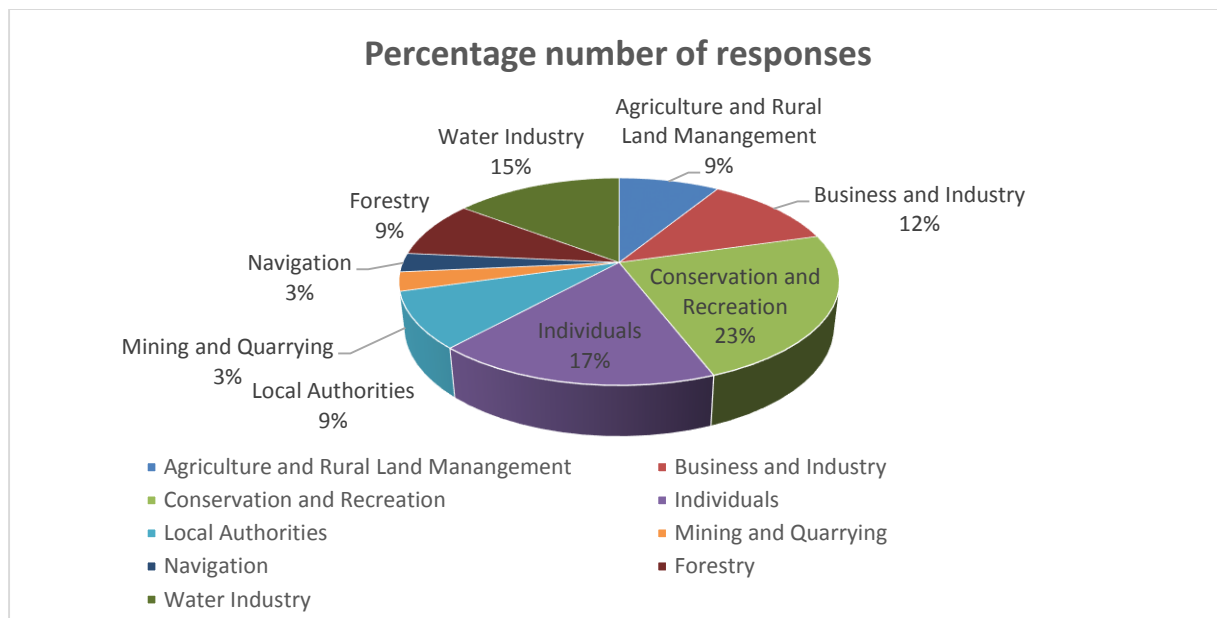
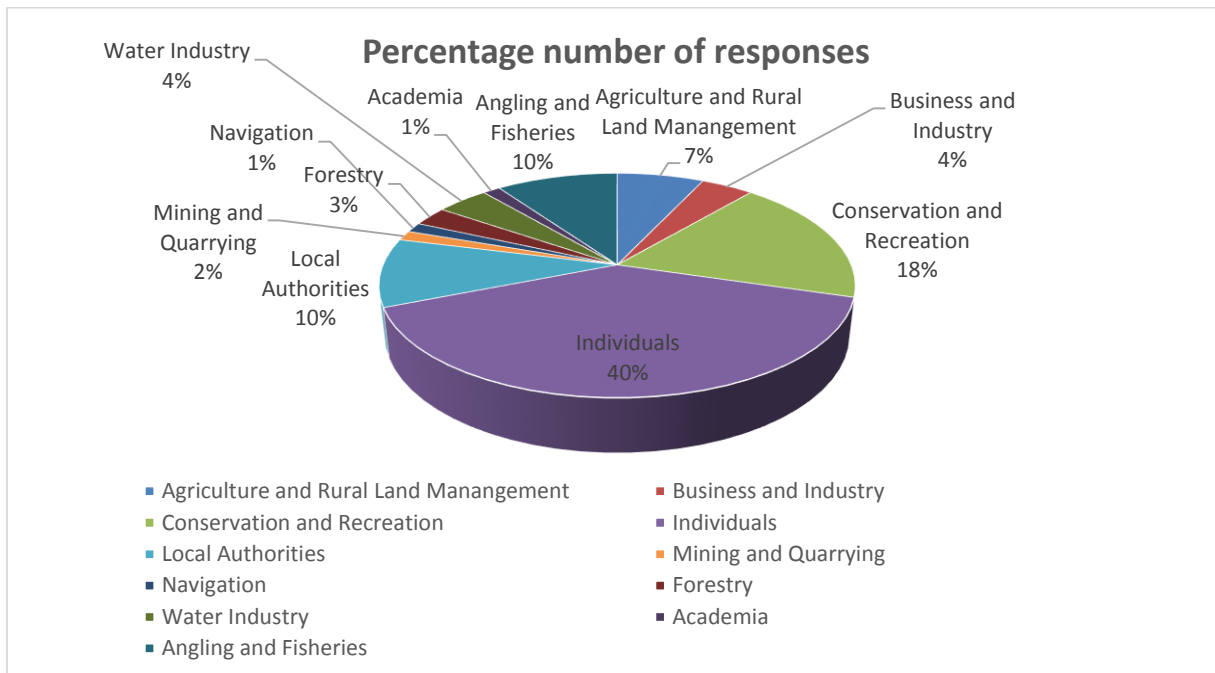


Figure 3 – Western Wales RBD responses



The following pages set out our responses to the comments received.

Consultation Question 1

Do you have any comments on the consultation document including suggestions on how we could improve this?

Overall respondents suggested that a more practical strategic RBMP is needed, which should include clear sign posting to support local delivery plus make links with other plans such as the Flood Risk Management Plans (FRMPs) and the Shoreline Management Plan (SMP). They considered that it is currently very difficult to access locally specific information on who is doing what, where and funding for local actions. There were a number of comments relating to the lack of information for our marine environment and that the documents really focused on rivers. The usability and navigation of the RBMP continues to be a real challenge.

Response

Improvements will be made to ensure users can make the connection between the strategic objectives through to local actions throughout the documents. This will be clearly set out either in the main document or the supporting Annex.

We will ensure we improve the content for marine, groundwater, wetlands and lakes so there is less of a focus on rivers and the documents better reflect the whole of our water environment.

a. Are the Management Catchment Summary documents helpful? Please provide us with comments on how we could improve them.

Respondents felt the catchment summaries were a useful supporting tool to the more strategic document. Suggestions were made on how Natural Resources Wales could improve these, including the addition of more detailed information on local initiatives such as partnerships and projects, funding through Rural Development Plan (RDP), EU and LIFE programmes. A number of omissions to specific catchment summaries were also raised. There were suggestions to integrate these with the recent FRMP summaries. Specifically for the Dee, there were some suggestions that we wouldn't necessarily require both a RBMP plus the catchment summary.

Response

We welcome both the support and the involvement of many of our partners in developing our first bundle of catchment summaries in Wales. We will consider further developing these as they could be a key tool to support both local delivery and the work of the River Basin District Liaison Panel. Further work on how we may want to integrate them with other summaries and the proposed Area Statements under the Environment (Wales) Bill is required. This will allow us to work with partners to ensure the summaries include better information on active partnerships and how overlaps in existing funded programmes such as Rural Development Plan and EU and LIFE funding can be used to deliver better outcomes for the environment.

We will also need to ensure the documents work alongside the statutory plans, Water Watch Wales and explore better alignment with other similar documents such as the FRMPs and Natura 2000 management plans. In the future, these summaries also offer us an opportunity to improve integration of other work programmes, with a focus on Natural Resource Planning in Wales.

In the updated plans, we will endeavour to enhance information on our marine environment and groundwater and to address any errors and omissions. Also we recognise that the environment is ever changing and we will need to ensure that if we want the summaries to form part of a useful delivery programme that they are relevant and up to date. For example, since the consultation the Skomer Marine Nature Reserve is now a Marine Conservation Zone.

b. Does Water Watch Wales work for you? Do you have any suggestions for further improvements?

Most respondents felt that Water Watch Wales was easy to use and contained a lot of useful, detailed information but some felt that more detail on tributaries was required. It was noted that at times the system suffered from glitches and some links didn't work. One respondent made the comment that there are many projects missing from the project map and that Natural Resources Wales need to update this. It was also said that there is no need for four maps as the information can be on one.

Some respondents suggested ways in which the system could be improved such as, a search facility, layer ordering and a filter on catchments. Some felt that more data could be added, e.g. Water Company data on supply, water quality for private supplies and aspirational projects.

Response

We welcome the comments received on Water Watch Wales and are endeavouring to continually improve it. In doing so we will consider the suggestions made for improvement. However, there are limitations with what we can do with Water Watch Wales, and it may be that we cannot incorporate all suggestions at this stage. Going forward we will retain your comments and suggestions for any future revised system that we may develop.

Consultation Question 2

In section 3 we have set out changes in how we assess and report on the water environment.

Do you agree with the proposed changes to the management catchment and water body boundaries?

Some respondents expressed concern that the small coastal waterbodies have been removed from the network. Some felt that this could lead to overlooking pollutants in these water bodies and that it gives an incomplete picture of the issues in the catchment. Others wanted to see which waterbodies have been deleted in order to make an informed choice. There were also concerns that some worthwhile projects will lose funding or impetus due to the proposed change and that we should avoid removing waterbodies where there are water company assets with a WFD driver for funding. There was also some concern in relation to where these waterbodies flow into coastal Protected Areas and the perceived reduction in monitoring.

There was mention of concern of using water catchments. It was felt that dividing the land according to water catchments does not take into account the uplands and that management of these sites can impact on several water catchments irrespective of the set boundaries. In addition, some catchments are linked due to man-made schemes (e.g. pipe lines) which can alter the hydrology and affect the water chemistry.

Response

All lengths of rivers, streams or drainage channels in Wales are protected by our domestic legislation. WFD requires that we report the status of our water bodies and to do that (for example in the RBMP) we use a river line within that catchment. For the current river basin management planning cycle this river line (often referred to as the 'blue line') was derived from the 1:50,000 scale river network. This has been updated using the 'detailed river network'. This river line is purely a reporting network and it is this river line which appears on maps in the updated RBMPs.

This revision of the network resulted in the removal of a number of small streams (i.e. those water courses less than 1km in length or with a catchment of less than 10 km²). The minimum size was in keeping with the original intention of the Directive. Even though these small waters are not reported, the WFD covers all bodies of surface water not just those represented as a blue-line on WFD maps. Where a stretch of water is too small to be formally a water body, or is too small to show up on a map of the water body, it is still protected by law from pollution, modification and abstraction and can still be improved where local actions and assessments deem it to be a priority.

In relation to water catchments, we are aware that the management of large upland sites can affect several downstream catchments. The local measures needed at these sites can deliver WFD objectives for multiple waterbodies. Natural Resources Wales is further developing an Upland Framework which concentrates on designated sites with the aim to improve the quality and biodiversity of upland ecosystems in Wales by:-

- Developing national and regional conservation priorities by highlighting important features and prioritising their conservation within particular areas.
- Targeting restoration and management of habitats to the best locations ecologically and strategically in Wales in addition to preventing fragmentation.
- Providing guidance for management planning, including setting long-term objectives and steering management to achieve these objectives on individual sites.

The proposed updates to the Framework are currently being trialled on the Eryri Special Area of Conservation.

a. Would you like to see lakes that are designated as Sites of Special Scientific Interest included within the second cycle?

The majority of those who answered the question agreed that Sites of Special Scientific Interest (SSSI) lakes should be included as Protected Areas, with one respondent strongly agreeing. However, some respondents had concerns in relation to (i) the potential additional burden for monitoring and management; (ii) the evidence for why this measure was required and (iii) the economic feasibility and whether actions would be unaffordable. Further information on the location and number of lakes was requested with some respondents identifying specific sites that were not shown on the map on Water Watch Wales.

Response

Twenty three lakes have been identified in this category, with a combined catchment area comprising < 0.3% of the land area of Wales. Natural Resources Wales already has a Welsh Government target, via the Wales Environment Strategy², to reach Favourable Condition for these lakes and other SSSIs, and condition assessment data for all of the lakes concerned. Sixteen of these lakes are in unfavourable condition, providing evidence that further action is needed. The scale and nature of impacts varied, but the majority of impacts are related to nutrients from diffuse sources.

Natural Resources Wales will decide on the most appropriate course of action in relation to designation of these lakes as Protected Areas in the RBMPs in the light of the consultation responses. We will be sharing our decision with Liaison Panel members at the next meeting in October, prior to sending the final RBMPs to Ministers for approval.

Consultation Question 3

In section 4 we have set out proposals for new national measures. A list of all measures can be found in the planning overview annex.

Do you agree with the proposed measures?

Most respondents agreed with the proposed measures, many adding comments on additional actions that could be taken forward to improve the environment. We are grateful for all suggestions and will consider these further as we produce the final plan.

Where respondents suggested measures/actions that aligned to our issues from challenges and choices we have captured them under those headings below;

² Welsh Government Environment Strategy for Wales 2006

a. Are there national measures you would like to see included, please tell us why and provide any further information to inform the measures.

Physical modifications

Some respondents felt that there should be improved linkages between the River Basin Management and Flood Risk Management Plans. Others felt that the use of hydropower guidelines needed to be more strictly imposed and monitored and another mentioned the damage that can be done to spawning tributaries if flood defence works by others are not undertaken correctly.

Response

Natural Resources Wales will demonstrate better integration between River Basin Management and Flood Risk Management Plans by identifying opportunities to improve the water environment through existing programmes of maintenance and scheme designs, embedding WFD information within programmes of work and identifying where priority WFD measures coincide with FRM protection measures. We will continue to work with all stakeholders to identify opportunities for better integration as we develop our approach to natural resource management. We will continue to work with other sectors to ensure that guidelines are adhered to and support them in fulfilling WFD obligations.

Pollution from sewerage and waste water

One respondent felt that increased use of drinking water Safeguard Zones within Wales would be beneficial and asked that Natural Resources Wales and Welsh Government work together to establish a designation process. Concern was expressed over the maintenance and emptying of septic tanks, both the frequency of such operations and the use of illegal service providers.

Response

We are working with Welsh Government regarding the designation of drinking water Safeguard Zones, where evidence supports the need. Natural Resources Wales has identified small sewage discharges serving private properties, such as septic tanks, as one of eight priority areas for tackling diffuse pollution in their Diffuse Pollution Plan for Wales. Small sewage treatment plants and septic tanks must be registered with Natural Resources Wales.

All registered small sewage treatment plants, including septic tanks, are required to be adequately maintained and operated. Where we become aware of pollution from these assets we will take appropriate action. We will shortly be publishing a guidance document 'Running your household sewage treatment systems correctly' as well as attending a meeting of Welsh Local Authority Building Control officers to raise awareness. Any companies emptying septic tanks need to be registered waste carriers, using non-registered carriers is an offence for the householders.

Welsh Government have indicated in their Water Strategy for Wales that they will support owners of private sewerage systems by working with Natural Resources Wales and other partners to provide guidance on septic tank maintenance. They will also engage with local authorities who have a duty to ensure that owners of private sewerage systems maintain them to prevent a threat to public or environmental health. They also plan to consult on and implement revised guidance for sewerage schemes for rural communities under

Section 101A of the Water Industry Act 1991 and consider legislating to simplify the process.

Pollution from rural areas

Some respondents felt that Natural Resources Wales should do more to prevent pollution in rural areas providing incentives, distributing good clear advice and guidance together with tighter regulation.

Many respondents commented that Natural Resources Wales were not always effective at detecting incidents and taking action. It was felt that more of a risk based approach should be applied / built on a knowledge of farm type/size/location/previous history etc. so that available resources are applied to effectively monitor those at highest risk.

Several organisations agreed that we need to look at more upstream solutions and especially issues and monitoring on smaller streams than those currently targeted. Some respondents commented that they are concerned that tackling 'agricultural diffuse pollution' cannot be done on a standardised basis – we need to all to work together, Welsh Government, Natural Resources Wales, land use sector and the third sector.

It was felt that Natural Resources Wales need a communication strategy and an action plan in place across Wales. This will ensure coordination and consistency of Natural Resources Wales' positive messages on how to help solve agriculture / rural pollution issues. Some felt that Natural Resources Wales need to acknowledge the work of third parties more. It was felt that we should explore whether stakeholders/partners have a formal monitoring role and may be able to help with resources. This is good partnership and intelligence sharing.

Some stakeholders expressed concern over how successful cross compliance is for regulating farms. It was thought that Natural Resources Wales should be more actively engaged with cross compliance and the new farm advisory service and focus more resources on advice and guidance. Some expressed concern about septic tanks in rural areas are a concern and a campaign to monitor for incidents and take action would be of benefit. We received a number of responses that the Rural Development Plan and its budget had real opportunities to solve issues in the next five years.

Many respondents felt that there was a need to further promote strategic tree planting and provide incentives using available mapping/modelling as a guide at both catchment and farm scale, for soil and water management on farmland to support sustainable agriculture. Many agreed that a strategy of greater planting in the upper catchments would have a positive effect. There was some concern that we are not always exemplars in managing our own woodland estate.

Response

Poor land management is a principal cause of diffuse water pollution. Natural Resources Wales' diffuse pollution action plan highlights livestock management, land management and slurry storage as three of the eight key areas of concern. The plan outlines the actions Natural Resources Wales intends to take to work with those directly causing the problems, and those who may influence the issue to reduce diffuse pollution.

Welsh Government's Water Strategy explains that the Glastir Advanced Scheme will remain the main mechanism for targeting activity to meet the WFD requirements. This approach will help to improve water quality and management by addressing issues along a watercourse rather than being restricted to a farm by farm approach. It will be complemented by infrastructure improvements delivered through the Sustainable Production Grant Scheme. The Glastir Woodland Creation Scheme also provides opportunities for landowners to contribute to water regulation and mitigation of agricultural land use practices through targeted woodland planting.

As Welsh Government's Water Strategy recognises, diffuse pollution can be difficult to identify and control and it emphasises the importance of a joined up approach to land and water management. They have indicated that they wish to work with the construction, forestry and agriculture sectors to understand, review and where appropriate, change current practices and regulatory approaches. They will consider whether a similar approach to that taken in Scotland is appropriate for addressing some of the issues in Wales. This has involved the use of general binding rules to address diffuse pollution. We would welcome the ability to use a general binding rules approach and to work with Welsh Government on a mechanism to put this into place.

Natural Resources Wales already focuses its work by adopting a risk based approach, including working closely with other partners to maximise our joint efforts. However there are always further opportunities to introduce new risk based approaches. We continually review our work and how we engage with others to ensure we optimise our efforts. We also know that proactive advice and guidance can help deliver better results. We work with government and our partners to ensure more of our focus is in these areas to help deliver the outcomes we want and see greater impact of Natural Resource Management.

Natural Resources Wales agree that there are still further opportunities to work together with Welsh Government and the land use sector (including the third sector) to tackle diffuse pollution in new and innovative ways. Welsh Government's Water Strategy for Wales also encourages Natural Resources Wales and their own Agricultural Advisory Services to work with landowners to develop a common understanding of diffuse pollution and how they can help to prevent it through improved land management. We are already working to further investigate these opportunities. We also agree the need for clear communications. This includes gathering local knowledge on site specific as well as the strategic issues. We can then deliver the most effective and efficient solution, e.g. advice, training events, local stakeholder/partnership engagement, guidance through existing channels, such as the farm advisory service, industry newsletters, and promotion of voluntary initiatives.

We recognise and use the opportunity to work with third parties with our monitoring work. We do, however, need the wider community to report issues they see to us as quickly as possible so that we can respond appropriately and consistently. Natural Resources Wales is already closely engaged with cross compliance and the new farm advisory service. We also provide advice and guidance and undertake direct support to Welsh Government. We have also advised Welsh Government on the types of interventions that will allow the next Rural Development Plan to support sustainable agriculture and improve ecological quality in the water environment.

Taking an ecosystem approach is a fundamental way of working and has been adopted by Natural Resources Wales. Mainstreaming natural resource management throughout the organisation and imbedding it within the land management sector will help deliver better water quality in all catchments. The Welsh Government Agricultural Strategy is another opportunity we are looking at to influence a change in behaviour in the sector.

Natural Resources Wales strive to be an exemplar of good practice in sustainable land management. We proactively share examples of our good practice to demonstrate (through guidance case studies and training events) best practice to land managers. The Welsh Government Woodland Estate (WGWE) is certificated under the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). These provide international forest management standards including economic, social and environmental criteria. The UK Woodland Assurance Standard (UKWAS) is both the FSC-UK and the PEFC-UK endorsed forest management standard for the UK. Under our Environmental Policy Statement Natural Resources Wales has committed to adopting and maintaining the UK Woodlands Assurance Standard (UKWAS) on the WGWE

Pollution from towns, cities and transport

Whilst point source pollution was mentioned, respondents focused their comments on mitigating the impact of diffuse urban pollution; including misconnections. The role of land use management and green infrastructure (GI) in preventing and mitigating the impact of diffuse urban pollution was emphasised. A suggestion was made that we adopt an additional measure to “influence planning authorities to require and enforce the use of Sustainable Urban Drainage Systems (SuDs) and contribute to the implementation of appropriate SuDs technology”.

Response

Natural Resources Wales’ Diffuse Pollution Plan identified industrial estates, drainage misconnections and surface water drainage from developed areas as priorities.

The points made are welcomed and have been noted by Natural Resources Wales. We consider that diffuse pollution presents a significant risk to waterbodies in urban areas. We are working to better understand and address the root causes of urban diffuse pollution. We concur that the adoption of appropriate green infrastructure offers significant potential for improving the water environment. We will ensure that the issues and suggestions are reflected in the final RBMP and give serious consideration to the inclusion of the suggested measure.

Welsh Government’s Water Strategy indicated that it will look at options to implement Schedule 3 of the Flood and Water Management Act 2010, which requires new developments to include SuDS features that comply with national standards. They will also publish interim national standards on an advisory basis until we commence Schedule 3 of the Flood and Water Management Act 2010. This will enable designers, property developers, local authorities and other interested parties to both demonstrate that they have taken account of the Welsh Government’s planning advice on Development and Flood Risk and to pilot the standards, so that if necessary they can be revised before being placed on a statutory footing. They will also undertake a review of current drainage ownership and related legislation, with a particular emphasis on surface water and orphaned assets and on drainage misconnections. This review will include the

operation of the mandatory sewerage adoption process and the effectiveness of the 2012 Ministers' Build Standards.

Pollution from Mines

One respondent recommended that action should be taken in existing and future WFD cycles to eliminate/reduce pollution to surface waters from former metal mines. They recommended that the Coal Authority should lead in this role. They considered that if funding is inadequate then other objectives should be set. Also, if there are other pollution impacts from other parties then they considered that action against these should be deferred until major impacts from metal mines have been reduced.

Response

Natural Resources Wales recognise the major impact that discharges from metal and coal mines are having on surface and groundwaters across Wales. Natural Resources Wales works closely with the Coal Authority, as a partner organisation, on these issues and they make valuable contributions to the technical aspects of this work. Subject to future funding and agreements it is hoped they will make an increased contribution to any future treatment and restoration programmes to improve the environment at these sites.

We recognise that all delivery partners should work in an integrated way but that funding will not necessarily be available to all partners at the same time. We also recognise that there are benefits to improvements within a class even though getting to good status may not be possible in the short term.

Changes to natural level and flow of water

One respondent mentioned the need for abstraction licensing reform to provide protection for internationally important wetlands and their associated species.

Response

Welsh Government have recently launched their Water Strategy for Wales. The Strategy identifies reform of the abstraction management system as one of the six policy priorities that they will place a focus on developing and delivering between 2015 and 2018.

Invasive non-native species (INNS)

Some respondents identified other ways to manage INNS impacts on the water environment. These included using other legislative tools, livestock fencing, periodic grazing and buffer strips to help with aquatic INNS management.

Response

Species Control Order opportunities through the 2015 Infrastructure Act could assist with INNS management in-line with guidance that Welsh Government will produce on how the Orders should be used. Using fencing, buffer strips and/ or grazing may be useful for INNS actions relating to internationally designated sites or when underpinned by evidence linking the INNS impact with the status of a waterbody. These would need to be considered on a site specific basis and include any particular circumstances associated with that site to make sure they were appropriate for the location in question.

b. What do you consider to be the local priorities for actions?

Many respondents answered this question and we received a variety of comments on local priorities for action that they felt were important. These included; protection for large areas of peat erosion, expanding and/or creating woodland to provide water infiltration and carbon sequestration, advice led regulation and encourage best practice. Improving the worst rivers which is more obvious and inspiring to tax payers. Others felt there should be more focus on shellfish waters and improvements to point and diffuse sources of pollution, including misconnections and providing more access to water.

Response

All points have been noted and we will continue to work locally with relevant sectors/individuals such as Rivers Trusts, community groups etc. to improve the water environment for all to enjoy.

***c. What measures can you deliver to help improve the water environment?
Please provide information on what these would be, where they could happen
and how they would deliver improvement.***

Respondents identified a broad spectrum of measures that they are planning to deliver, which will support WFD outcomes. These include:

- projects to restore degraded habitats and ecosystems, such as wetlands, bogs and woodlands.
- management of invasive non-native species.
- engaging local communities and land owners in voluntary action on environmental issues.
- development and coordination of local partnerships in order to deliver environmental outcomes effectively.
- water company asset management plans, which will deliver investigations and investments to reduce the impacts of sewage discharges and impoundments.
- dissemination of information to members and the wider community on best practice and funding mechanisms, in order to facilitate change to more sustainable land management practices.

Stakeholders also identified the need to trial innovative solutions, such as the use of shellfish to “clean” polluted waters.

Response

We recognise the large and positive contribution that many organisations make in delivering environmental improvements. We will continue to work with strategic and local stakeholders to identify opportunities to ‘join up’ both planning and delivery. Through the second cycle, we want to develop our approach to natural resource management and capturing the wider benefits delivered through WFD. We agree that innovation has an important role to play and want to work with partners to develop new approaches and techniques to resolving problems, this can have the added benefit of supporting new or local businesses.

Currently we are reviewing and prioritising the measures that we will aim to deliver during the second cycle, in order that our programme is prioritised and delivers sustainable improvements. We recognise the need to work with others and align resources as best

possible. Sustainable outcomes will only be delivered through joint working and partnership. The contribution of partners during the first cycle and responses to this consultation are informing this work.

Consultation Question 4

In section 4 we have summarised the number of water bodies where we propose an extended deadline or less stringent objective is appropriate. A list of water bodies and justifications can be found in the planning overview annex alongside our approach.

Do you have any further information to inform where we have proposed an alternative objective?

Most respondents acknowledged that WFD allows the use of alternative objectives, that these should be applied where there is robust evidence and that it is important to be honest with stakeholders about what is realistic in terms of technical feasibility, disproportionate cost and/or funding. For example, the Coal Authority is currently only funded to deliver solutions to coal mine waters, and is not funded to deliver solutions to metal mine pollution. A number of respondents requested further information or clarification on proposed alternative objectives. For example, concern was expressed over the use of “natural conditions” to derogate objectives where the failure is caused by acidification.

Response

Natural Resources Wales agrees that setting evidence-based and realistic objectives will benefit the WFD planning process. The first cycle investigation programme and the economic assessment which formed part of this consultation has provided us with a better understanding of what is technically feasible, cost-beneficial and prioritised for the second cycle. We will use this evidence and consultation responses to inform our approach to setting alternative objectives.

We recognise the need to be transparent in our approach and will ensure our methods and justifications are explained clearly. In terms, of “natural conditions” this refers to the need to extend the WFD objective to good by 2027, because of the length of time that natural conditions will require to recover following the impacts of acid deposition. It was not intended to suggest that acidification is a natural process.

We continue to work with Welsh Government and other partners to identify further opportunities for funding. In the case of legacy metal mine pollution we are working closely with the Coal Authority and other partners to develop and deliver innovative treatment schemes at a small number of sites.

Consultation Question 5

In section 4 we explain that we need to develop a prioritised programme for delivery during the second cycle.

Do you agree that measures should be prioritised on the basis of statutory objectives (i.e. prevent deterioration and deliver protected area objectives) and evidence of the costs and benefits of outcomes?

Respondents generally agree that there is a need to prioritise statutory objectives, in particular protected areas (designated sites). Most respondents acknowledge the need to ensure the programme is linked to clear funding and delivery mechanisms, and underpinned by robust evidence. There is a wide variety of views on the use of costs and benefits, including the need to future-proof outcomes, ensure sectors invest proportionately, improve some of the worst performing water bodies, and promote high benefit actions where funding is clearly available (e.g. tree planting).

Response

We have worked with Liaison Panel members and Welsh Government to develop our approach to the second cycle programme. This work has identified some of the key challenges, in particular the need to share information, work in partnership to develop a common understanding of costs and benefits, and prioritise actions/outcomes.

We will continue to work with Liaison Panels and Welsh Government to develop a cost-beneficial programme of measures that prioritises statutory objectives, but also ensures we take wider opportunities to deliver local environmental benefits and benefits for people and the economy. Following Ministerial approval we will ensure we take a place-based (local) and participatory approach in order that we 'join up' delivery with partners at the catchment scale. We want second cycle delivery to help inform our approach to natural resources management in Wales and our understanding of the wider benefits of WFD outcomes.

Consultation Question 6

In section 4 we have modelled the costs and benefits of delivering improvements under four scenarios.

Are the scenarios and economic assessment we have provided as part of this plan helpful?

Respondents expressed a wide variety of views on the scenarios and economic assessment. A number felt that there were significant gaps in cost information and that it would have been useful to base one of the scenarios on an assessment of affordable measures and outcomes.

Response

We acknowledge the feedback that we have received in this consultation. Currently, we are working with Liaison Panels and Welsh Government to develop a prioritised and cost-beneficial programme of measures. We will use the response to this consultation to inform how we develop our assessment of costs and benefits which will form part of the final RBMP.

2.1 Strategic Environmental Assessment Consultation Questions

An Environmental Report documenting the Strategic Environmental Assessment (SEA) that is being undertaken for each of the RBMPs was published alongside the draft plans. The aim being to ensure consultees are made aware of and able to comment on the potential positive and negative environmental effects of implementing the draft plan. A summary of comments received on the Environmental Reports is provided below. We will provide greater detail of how consultations have been taken into account in the Statements of Particulars that will be published alongside the final plans in December.

Consultation Question 7

Do you agree that we have sufficiently assessed the significant effects of the River Basin Management Plan? Please describe any further aspects we should consider.

Respondents generally considered that sufficient assessment had been conducted of the plan and there was recognition of the overarching environmental benefits being delivered by the plan. However, some respondents requested further detail of how the SEA was undertaken, including the application of the ecosystem approach.

There was concern from some respondents that a Habitats Regulations Assessment (HRA) had not been published alongside the draft plan and been taken into account in the SEA.

Response

The Environmental Report provided an overview of the SEA that was undertaken but was underpinned by further work such as the review of relevant policies and plans, the detailed appraisal undertaken using Appraisal Summary Tables and the detailed consideration of the scoping consultation responses. These were not published as appendices in an effort to keep documents concise, but they can be provided upon request.

We agree that the HRA should take place alongside the preparation of the plan. The HRA is being undertaken alongside and is influencing the prioritisation of measures and the preparation of the final plan and will be in place prior to finalising and approving the plan. We will be consulting Natural Resources Wales' Strategic Assessment Team and Natural England (for the Dee RBMP) on the draft HRA and the final HRA ahead of finalising and approving the plan.

Consultation Question 8

Do you have concerns about the environmental effects of the river basin management plan that are not covered by this assessment? Please describe what they are.

Many respondents recognised the diverse nature of the environment in Wales and the need for local knowledge from landowners, anglers, recreational users, residents and industry to be taken into account as well as the importance of local sites to be considered at a strategic scale.

Potential for significant effects of the plan on the historic environment was a cause of concern for some respondents but generally it was felt that the potential effects have been overplayed.

Some respondents felt that we underplayed the significant recreation and tourism benefits from delivery of the plan which will benefit fisheries.

Response

The draft RBMP and accompanying Environmental Report are high level documents but are supported by a wealth of detailed information, considerations and knowledge. Local knowledge and sites will be hugely important in the delivery of the measures and, as recognised by one respondent, "everybody has the responsibility to ensure the success of the plan".

The SEA identified the potential for the plan to have significant effects on the historic environment but agree that there are project level actions that can and will be implemented to avoid, reduce or mitigate possible negative effects. We would undertake environmental assessment of any such projects in line with our own policies as well as Local Development Plan policies to prevent, reduce or mitigate negative effects.

We will ensure that the monitoring we propose in the Statement of Particulars is designed to demonstrate the actual effects to tourism and recreation derived from the improvement to fisheries. The monitoring of any environmentally significant effects will be set out in the Statement of Particulars.

Consultation Question 9

Are there other mitigation or opportunities that we should consider delivering with the proposed measures?

There were suggestions that the plans should seek to deliver enhancements such as habitat creation and tree planting. It was suggested that an increase in targeted tree planting across rural and urban landscapes can contribute significantly to achieving the right conditions to support healthy populations of pollinators and would have a significant benefit in relation to connectivity of tree and woodland habitat. It was felt that these would benefit biodiversity, recreation, landscape and tourism.

Respondents also highlighted opportunities for recreational improvements such as considering improving or increasing public rights of way through delivery of any infrastructure projects as a result of the plan.

Response

These suggestions will be incorporated into the Statement of Particulars and RBMP where necessary.

2.2 Overarching Themes

Standards

Some respondents commented that the change in the standards between cycles sends confusing messages on the WFD headline compliance. In relation to the phosphorus standards comments were made that it was unclear what weight they should be given and how they will impact on the RBMP. There was concern that meeting the targets at Natura 2000 sites (N2K) could affect the WFD work programmes for co-deliverers and that the consultation on these standards were too late.

Response

Some of the environmental standards upon which we classify the waterbodies across the UK has been updated since the first cycle plan (2009-2015). These were consulted on and published by the UK Technical Advisory Group. We are expecting these to be transposed into UK Directions in the autumn. These standards have changed due to better integration with standards used in the rest of Europe and an improved scientific understanding. In the First Cycle Progress report and RBMP we will report progress based on the first cycle standards and use the new standards for cycle 2 (2015-2021) to establish our baseline for 2015.

The phosphorus standards were requested by the liaison panels and we responded in February 2015 with the rules for setting these standards for river and lake Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs) and proposed standards for affected waterbodies. The Defra/Welsh Government River Basin Planning Guidance states that we 'should apply the most stringent standard to the water body or part of water body that is a protected area'. The document outlined our approach to setting standards based on the Joint Nature Conservation Committee (JNCC) Common Standards Monitoring Guidance so that we comply with the legislation, improve transparency of which standards apply at a local scale and to better plan for water quality improvements. We have assessed compliance against the proposed revised standards. Approximately a third of the waterbodies with data fail, however the majority of failures is small (less than 5µg/l). For rivers 13 waterbodies failed by 10-30µg/l and 3 by greater than 30µg/l.

Many of these waterbodies are already identified as failing the WFD objective. The points made in relation to the phosphorus standards consultation have been noted. We will continue to work with stakeholders through the Liaison Panels to address any queries on the derivation and implications of the standards and will share our decision prior to sending the final RBMPs to Ministers for approval.

Prioritised Improvement Plans (PIPs)

Some organisations commented that the PIPs include few costs against identified actions and that there is no indication as to how they will feed into the RBMP. There were particular concerns that these costs had not been taken into account in the economic analysis presented in the draft RBMPs as it was published prior to the production of some PIPs and Site Improvement Plans (SIPs). Hence there is a risk that some potentially large costs that have not been taken into account. This could have implications in the Ministerial assessment of affordability of the final RBMP. There was also mention that the PIPs do not state the condition of designated features.

For the Dee River Basin District the failure to meet Natura 2000 objectives as cited in the first RBMP was highlighted. There was mention of actions not yet being operational and that many actions are repeated in the WFD programme of measures and the PIPs. It was felt that the final RBMP need to report the reasons why the Natura 2000 sites have not achieved Favourable Conservation Status (FCS) and/or why these actions have not been made operational.

Response

We acknowledge the need to further integrate Protected Area information in the planning and delivery of the final RBMPs.

In relation to the costings in the PIPs, the work undertaken as part of the LIFE Natura 2000 programme is the first time that proposed actions for Natura 2000 sites have been costed across the network. During 2015, we are engaging internally and with partners to improve our understanding of actions and costs. This work will continue until the end of August. We aim to include updated information on Natura 2000 actions and their costs in the final RBMP presented to the Minister.

Through the LIFE Natura 2000 engagement process a matrix including information on the condition of each Natura 2000 feature on the site has been shared. This refers to the

condition of each designated feature in Natura 2000 site. This is different from Favourable Conservation Status (FCS), which refers to the status of the feature across the whole of the UK which includes both the protected sites and the wider landscape. This UK FCS data is published online on the Joint Nature Conservation Committee (JNCC) website.

Classification

Some respondents felt that there was a lack of clarity over why a water body is less than good or where water bodies are classified relative to neighbouring water bodies. A number of respondents were concerned about the number of water bodies where the reason for not achieving good is unknown. Others felt that many apparent improvements are actually due to revised methods rather than real environmental change, and that this should be recognised in the interpretation of results. There are concerns that the fish classification system is over optimistic in assessing the status of fish populations and that it requires review. In particular, some partners appear concerned that over- optimistic assessments will make it difficult to obtain funding for habitat restoration projects

Response

Each water body is classified using assessments of a number of elements. They are not classified relative to each other but using data collected for that water body. Where a water body fails to achieve good status the elements that cause that failure are identified on Water Watch Wales. When a water body fails to achieve good the reasons are explored by site investigations. The reason for failure is recorded as unknown until the investigation is completed and may remain so if the investigation is inconclusive.

In reporting progress we are required to report the reasons for improvement or deterioration. It is recognised that in many cases the way we collected data, and the standards against which that data is compared may change during the planning cycle making comparisons sometimes difficult. In these cases the recorded reason for failure are documented. All monitoring methods and data analysis tools are developed by and agreed across the UK by the UK technical advisory group (UKTAG). Methods and tools are kept under review and specific comments raised about the fish classification tool will be communicated to the relevant UKTAG working group. We will continue to work with stakeholders through the Liaison Panel to address the concerns about the fish classification and will share our approach prior to sending the final RBMP's to Ministers for approval.

Dredging

One respondent commented that in their opinion dredging does not have a bad effect on river management and considered that it appears to improve fish numbers. They also mentioned that severe flooding had been caused by blockages in the river that need removing and generally more maintenance work was required.

Response

In channel maintenance such as dredging and deshoaling continues to be a major part of routine maintenance work in Natural Resources Wales. This activity is focussed on locations where it can be justified on flood risk, economic and environmental grounds. Research has shown that dredging operations can be beneficial in some localities and circumstances. However consideration must be given to the environmental impacts and the risk of creating greater flood risk to communities downstream of these operations.

Natural Resources Wales is investing resources in identifying where and when to carry out deshoaling/dredging work in Wales to ensure that this work is done as efficiently and effectively as possible.

Natural Resources Wales acts in the public interest to remove blockages, such as fallen trees, from Main River watercourses where they pose a flood risk to people and property. This typically occurs when trees and debris get caught on bridge crossings. It is the asset owner or riparian owner's responsibility in the first instance to maintain their assets.

Omissions

Some respondents mentioned that there was a lack of acknowledgment in the RBMP of the work that eNGOs have undertaken and the potential for Natural Resources Wales to work more closely with them. Some felt that more could have been said about Drinking Water Protection Zones (DWPZs) and Safeguard Zones (SGZs). It was also felt that there should be more emphasis on pesticides, in particular the need to encourage effective use. There was also a lack of reference to the 'DeePol' manual on pollution incidents for the Dee RBD. One respondent felt that comments they had made in the Challenges and Choices consultation had not been considered.

Response

Natural Resources Wales do value and consider all responses received to our consultations and act on them where possible. We apologise if we have missed something or failed to explain clearly the reason something hasn't been incorporated. The points made have been noted and Natural Resources Wales will ensure that the final RBMP is revised accordingly.

Monitoring

A number of respondents raised their concerns that Natural Resources Wales should do more rather than less monitoring for WFD and Habitats Directive.

Response

Natural Resources Wales will rationalise our monitoring programme where appropriate so that we can concentrate on the essentials, and look at innovative ways to strengthen our information. We'll use others' information where it is suitable and meets our needs. Our review of monitoring will ensure that it is efficient, fit for purpose and delivers the requirements of the relevant Directives. Monitoring in water bodies where risks are apparent and where measures are being undertaken to improve status will be a priority as will making that information available to our partners.

Forestry/Woodland

A number of respondents commented that there is a lack of emphasis on the beneficial role of trees, with particular reference being made to how forest and woodland helps to mitigate flooding. Also noted were the benefits regarding reduced input of soils and other pollutants and the general benefit regarding green infrastructure for recreation and tourism, landscape value, and water and waste processes. Furthermore, that the RBMP failed to connect tree planting with Welsh Government's Pollinator Action Plan.

Some respondents commented that the cost of tree planting compared favourably to other measures but noted the need for funding and a skilled workforce to deliver these benefits. It was felt that woodland creation should be specifically included in the measures.

Response

The points made have been noted and Natural Resources Wales will ensure that the final RBMP is revised to include reference to the benefits of woodland creation, including productive woodland, and link this to flood amelioration. We will look at how we might incorporate tree planting into the measures. We recognise there is a need to strengthen the evidence base regarding the use of tree planting for wider ecosystem benefits and the need for a skilled workforce in order to deliver these benefits.

Mitigation Measures Assessment (HMWB)

One respondent felt that there were inconsistencies between the Environment Agency (EA) and Natural Resources Wales on the approach towards mitigation measures for the ports and harbours sector. Furthermore that the actions required by that sector were not clear.

Response

We understand the concerns raised. We will discuss these in more detail with the ports and harbours sector and the EA to gain consistency and clarity where possible for the shared River Basin Districts.

Engagement

Some respondents felt that more needs to be done to include people at a local level. One respondent said that they were not aware of catchment workshops we held in 2014. It was felt that local engagement is needed with the farming community to offer advice and guidance on land management improvements. It was mentioned that there should be a locally focussed delivery structure in Wales to help stimulate and facilitate coordinated delivery at a local level, except for where some local NGOs have taken the initiative already.

Response

We regularly update our stakeholder list as a consequence of each consultation and engagement opportunity, all those who have responded to or attended any events previously will be on our list. We recognise the benefits of working with stakeholders at a local level and as we move forward with our 'place based' teams we hope to have more opportunities to work with local groups and individuals to deliver more improvements for the environment.

Tidal Lagoons

One respondent considered that the plans did not consider the potential for tidal lagoon projects to be developed in the next six year plans and the potential improvements in coastal protection, water quality and habitat creation that could contribute to improvements in the water environment. It was suggested that RBMP measures should relate to the potential challenges and opportunities presented by these developments, and that there is not a mechanism to coordinate and address projects that could influence more than one river basin district.

Response

We acknowledge the points raised within the response and will work closely with the respondent within existing bilateral groups that have been established to address their concerns. We recognise that tidal lagoons can offer some positive benefits however it

should also be noted that developments of this nature may cause a deterioration in WFD Ecological Status and conflict with mitigation measures for Heavily Modified Water Bodies and will therefore require a derogation assessment under Article 4.7.

The Planning Process is the mechanism by which such considerations must be dealt with and can also act as the forum to discuss cross border and cross river basin district concerns. It should also be noted that in the absence of a national plan for tidal range developments it is difficult to fully consider schemes of this nature within the RBMPs prior to them being built, however, we will aim to prioritise measures that will be complimentary to a tidal lagoon proposal if there is a significant confidence that the development will be built.

WFD and Marine Strategy Framework Directive (MSFD)

Some respondents felt there was a lack of clarity on the role of the WFD in delivery of the Marine Strategy Framework Directive (MSFD). In particular it was highlighted that there is a need to provide information on how the measures to achieve the objectives of the WFD will contribute to MSFD objectives. It was also raised that the relationship between the monitoring activities requires further information.

Response

Whilst information on links to between the WFD and MSFD was provided in the Planning Overview Annex section 2.2.3 with references to further information, Natural Resources Wales recognise the importance of the policy area to stakeholders and that it was absent from the draft RBMPs. We will endeavour to highlight this important policy area in the final plans and provide further detail on request. We clarify here that all Natural Resources Wales monitoring programmes for WFD contribute to the MSFD assessment of Good Environmental Status particularly for the descriptors on contaminants, eutrophication and significant elements of the biological descriptors.

Shellfish standards/Chemicals

Some respondents felt that Estuarine and Coastal concerns are not sufficiently highlighted within the plans and summary documents. Some comments identified a need for a better understanding and management of diffuse pollution from catchment to coast. It was felt that there was a lack of consideration of the potential positive benefits of shellfisheries. Two respondents raised the requirement for greater concern of achieving chemical status in the marine environment and in particular with reference to Cadmium, Mercury and emerging chemicals. It was highlighted that there is a requirement to align objectives, management approaches and geographic scales of the designations relevant to the industry.

Response

The transfer of legislative requirements from the Shellfish Waters Directive to the WFD has guided Natural Resources Wales to further engage with the Shellfish and Fisheries Industry and welcome this further stakeholder input. Natural Resources Wales will continue to work with the Shellfish Industry, academia and the Food Standards Agency to investigate and put in place necessary measures as required by WFD for the concerns expressed for chemicals in the estuarine and coastal environment that could impact on the Shellfish and Fishery Industries.

Natural Resources Wales will continue to work within the Welsh Shellfish Waters Partnership Group to further the management and progress the timely alignment of areas designated for Shellfish mariculture. The most prevalent pressures on Estuarine and Coastal water bodies are hydromorphology, nutrients and chemicals, which are mainly derived from the catchment and therefore are best managed by a catchment based approach. It was for this reason that the catchment summaries took a catchment to coast approach. However, we will take into account the feedback on requiring a marine summary when we consider any further development of the documents.

Working Together

A number of respondents commented that they would like to work more closely with Natural Resources Wales and other stakeholders to facilitate co-ordinated delivery of improvements on the ground. One respondent commented that there may be opportunities to share data and modelling outputs where appropriate to support delivery. These included sectors such as, Water Industry, Agricultural Sector, Forestry sector, Rivers Trusts, Wildlife Trusts, Local Fisheries Clubs, Local Authorities and National Parks as well as some individuals.

Response

We look forward to working closely throughout the second cycle with a wide range of sectors and individuals to bring about further improvements to the water environment.

Local Responses

We received a number of individual responses raising specific concerns over the water environment in their locality, these have been passed to our operational colleagues to follow up in due course.

3 Next Steps

Responses to this consultation will be used to inform the development and delivery of the updated River Basin Management Plans which will be published on our website on 22 December 2015.

The plans will set out the strategic issues facing the water environment in the River Basin Districts and the actions planned to protect and improve it between 2016 and 2021. River Basin Planning is continually evolving as our environment changes together with our collective knowledge and approaches. The updated plans are an opportunity to review where we have got to and where we want to go.

To deliver the improvements we want to see we recognise that new sustainable and joined-up solutions must be found. In Wales the proposals in the Environment (Wales) Bill will help us focus on a more integrated approach to natural resource management, looking at the root causes of problems and working with stakeholders to find appropriate solutions. Our goal for the River Basin Districts is not simply to deliver the requirements of the WFD, but to integrate planning and delivery of objectives for Protected Areas where possible. We will also aim to coordinate and link WFD planning and delivery with our implementation of the Floods Directive.

We cannot deliver the necessary objectives by legislation and guidance alone – we need to work together with our partners in sharing expertise and developing common outcomes

we can all work towards. Land managers, farms, businesses, industry, water companies, local authorities, planners, governmental bodies, non-governmental organisations, and individuals must commit to changing our relationship with water and the environment it supports.

We welcome that work is ongoing to develop the means by which the RBMP will be delivered. The Liaison Panels will have a role, and at a local level there will continue to be catchment approaches, partnership projects and cross sector working. We are pleased to see that from the responses a number of individuals and organisations have given their support to the Plan, and their willingness to help deliver the improvements to the water environment is welcomed. We look forward to working with them in the coming years to further develop ideas, actions plans and solutions.

Further information about the Water Framework Directive can be found on our website.

Alternatively you can contact:

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Data protection prevents us from naming individuals who have not given permission for their details to be made public. A copy of the responses is available on request.

Appendix 1 - Meetings and Workshops

Event	Sector	Number of attendees	Approach
Engagement Workshop June 2014	Dŵr Cymru Keep Wales Tidy and Wildlife Trust	14	To share and develop ideas to communicate and promote the consultation.
All Wales Liaison Panel Workshop July 2014	Various	21	Contribute to the consultation documents, provide a steer on the consultation questions and the approach with the catchment summaries. Develop ideas for communicating and promoting the updated River Basin Management Plans and the Flood Risk Management Plans during the consultation period.
October 2014 Severn Liaison Panel	Various	15	Review progress and prepare for consultation.
October 2014 Lead Local Flood Authorities	Local Authorities	12	Raised awareness of consultation.
October 2014 Consumer Council for Water	Water Industry	10	Raised awareness of consultation.
October 2014 Dee Liaison Panel Meeting	Various	14	The panel provided feedback on the issues they felt should be focussed on during the consultation, who can help and additional communications tools required to support the consultation. A list of future events was provided that can be used to promote the consultation.
October 2014 Western Wales Liaison Panel Meeting	Various	15	Same approach as above.
October 2014 Welsh Dee Trust	Conservation		Article in Welsh Dee Trust newsletter promoting the River Basin Management Plan and Flood Risk Management Plan consultations.
Nov. 2014 Welsh Government Stakeholder Forum	Various	30	The event focussed on topics relevant to the consultation. This included Dŵr Cymru's drinking water investigations programme, the Dee Invasive Non-Native Species Project, and an overview of hydropower development in Wales.
Nov 2014 Liaison Panel Task and Finish Group	Various	15	Group to discuss prioritisation, delivery plan, tracking of measures.
Nov 2014 Wales Land Management Forum	Rural Land Management	19	Raised awareness of consultation.

Event	Sector	Number of attendees	Approach
Nov 2014 CIWEM	Various		Message sent to promote launch of the consultation the River Basin Management Plan and Flood Risk Management Plan.
Dec 2014 Energy UK Forum	Business/Industry	7	Raised awareness of consultation.
Dec 2014 Middle Dee Partnership	Various	13	Raised awareness of consultation.
Dec 2014 Tidal Dee Partnership	Various	11	Raised awareness of consultation.
Dec 2014 Dŵr Cymru Ops. Liaison Meeting West	Water Industry	8	Raised awareness of consultation.
Dec 2014 Conwy, Clwyd and Gwynedd Rivers Trust	Conservation	12	Raised awareness of consultation.
Dec 2014 Wales Water Industry Forum	Water Industry	16	Raised awareness of consultation.
Dec 2014 Taff, Usk and Wye Local Fisheries Groups	Fisheries	40	Raised awareness of consultation.
Dec 2014 by North Wales Wildlife Trust	Conservation		Article in Daily Post Promoting Alun and Chwiler Living Landscape Project.
Dec 2014 Ops. Liaison Meeting East	Water Industry	9	Raised awareness of consultation.
Dec 2014 Wales Biodiversity Partnership	Conservation	30	Message promoting the consultation launch sent to partnership. The consultation was featured on the Wales Biodiversity Partnership monthly e-newsletter for two months. Also placed on the Freshwater page of the Wales Biodiversity Partnership website.
Jan 2015 Local National Farmers Union Cymru Meeting	Rural Land Management	2	Raised awareness of consultation and discuss aim of consultation.
Jan 2015 Gower and Western Wales Local Fisheries Groups	Fisheries	38	Message sent to promote the consultation to group members.
Jan 2015 Liaison Panel Workshop	Various	16	Review progress of consultation.
Jan 2015 Inland Fisheries Group	Fisheries	15	Raise awareness of consultation and briefing on Shellfish issued.
Jan 2015 Mid Fisheries Group	Fisheries	15	See approach above.
Jan 2015 IEAP Meeting	Various	16	Raised awareness of consultation and feedback received to the consultation.
Jan 2015 5 Relevant Authority Groups within the Pembrokeshire Marine European Site	Marine	75	Message to promote the consultation sent to group members.

Event	Sector	Number of attendees	Approach
Jan 2015 North East Wales Bionet	Conservation	67	Consultation details sent to members.
Jan 2015 National Access Forum	Recreation	40 groups	Consultation details sent to Forum groups.
Jan 2015 Wye Partnership	Conservation	15	Raised awareness of consultation.
Jan 2015 Pembrokeshire Sustainable Agriculture Group	Rural Land Management		Raised awareness of consultation.
Jan 2015 Pembrokeshire Environment Forum	Various	8	Raised awareness of consultation.
Feb 2015 North Wales Farming and Wildlife Advisory Group	Rural Land Management/ Conservation	33	Consultation details sent to group.
Feb 2015 Wales Biodiversity Partnership	Conservation	30	Reminder message sent to group members.
Feb 2015 Seascape Workshop and Marine Stakeholders Reference Group	Marine	40	Raised awareness of consultation.
Feb 2015 North Inland Fisheries Group	Fisheries	15	Raised awareness of consultation.
Feb 2015 Wales Environment Link Land Use and Biodiversity Group	Conservation	10	Raised awareness of consultation.
Feb 2015 Carmarthenshire Biodiversity Partnership	Conservation	25	Raised awareness of consultation.
Feb 2015 Farmers' Union of Wales	Rural Land Management	20	Raised awareness of consultation.
Feb 2015 Association of Drainage Authorities Cymru	Rural Land Management	11	Raised awareness of consultation.
March 2015 Bangor Mussel Producers	Fisheries	1	Discuss existing and proposed measures for each Shellfish Water and secure a response.
March 2015 Pembrokeshire Coastal Forum	Various	19	Raised awareness of consultation.
March 2015 Lakes Conference	Various	50	Raised awareness of consultation.
March 2015 Marine Strategy Framework Directive Workshop	Marine	32	Raised awareness of consultation.
March 2015 Dee and Clwyd Local Fisheries Group	Fisheries	12	Raised awareness of consultation.

Event	Sector	Number of attendees	Approach
Gwynedd and Conwy Local Fisheries Group	Fisheries	16	Raised awareness of consultation.
March 2015 Middle Dee Partnership	Various	35	Raised awareness of consultation.
March 2015 Wales Marine Strategic Advisory Group	Marine	35	Briefing provided on the status of coastal and estuarine bodies. Raised awareness of consultation.
March 2015 Mine waters Conference	Mining	40	Raised awareness of consultation.
March 2015 Dee Liaison Panel	Various	18	Progress update.
March 2015 Western Wales Liaison Panel	Various	16	Progress update.
March 2015 Wales Shellfish Forum	Fisheries	8	Raise awareness of consultation.
March 2015 Timber Trade Liaison Event	Business and Industry	75	Raised awareness of consultation.
March 2015 Welsh Fisheries Association	Fisheries	1	Raised awareness of consultation.

Appendix 2 – List of respondents

NAME	SECTOR	River Basin District
Wales Wild Land Foundation	Conservation	All Wales
Wales Biodiversity Partnership's Upland Ecosystem Group	Conservation	All Wales
Tidal Lagoon Power	Navigation	All Wales
Farmers Union Wales	Agriculture	All Wales
Water Health Partnership	Water Industry	All Wales
Natural England	Conservation	Dee
North Wales Wildlife Trust	Conservation	Dee
North West Coastal Forum	Navigation	Dee
Country Land and Business Association	Land Management	Dee
Consumer Council for Water	Water Industry	Dee
Tidal and Middle Dee Partnership	Conservation	Dee
Dŵr Cymru Welsh Water	Water Industry	Dee
Welsh Dee Trust	Conservation	Dee
Conwy County Borough Council	Local Authority	Dee
Flood Prevention Society	Land Management	Dee
National Farmers Union Cymru	Agriculture	Dee
Snowdonia National Park	Conservation and recreation	Dee
United Utilities	Water Industry	Dee
Coed Cadw	Forestry	Dee
Coal Authority	Mining	Dee
Institute of Chartered Foresters	Forestry	Dee
Confor	Forestry	Dee
Food Standards Agency	Business/Industry	Dee
Energy UK	Business and Industry	Dee
Natural Resources Wales (SEA)	Conservation and Recreation	Dee
Flintshire County Council	Local Authority	Dee
Six Individual Responses	Wide Ranging	Dee
Dundee University	Academia	Western Wales
Coed Cadw	Forestry	Western Wales
Pembrokeshire Coast National Park	Recreation	Western Wales
Consumer Council for Water	Water Industry	Western Wales
Snowdonia National Park	Conservation and Recreation	Western Wales
Dŵr Cymru Welsh Water	Water Industry	Western Wales
Afonydd Cymru	Conservation	Western Wales
NFU Cymru	Agriculture	Western Wales
Wildlife Trust Wales	Conservation	Western Wales
Wildfowl and Wetlands Trust	Conservation	Western Wales

NAME	SECTOR	River Basin District
Northern and Southern Snowdonia Access Forums	Recreation	Western Wales
Pembrokeshire Anglers Association	Fisheries	Western Wales
Coal Authority	Mining	Western Wales
Afan Valley Angling Club	Fisheries	Western Wales
Brecon Beacons National Park	Conservation	Western Wales
Gwynedd County Council	Local Authority	Western Wales
Regional Advisory Group Pembrokeshire Marine SAC	Conservation	Western Wales
Pembrokeshire Rivers Trusts	Conservation	Western Wales
Tregaron Angling Association	Fisheries	Western Wales
Planned	Land Management	Western Wales
Regional Advisory Group Carmarthen Bay Marine Site	Conservation	Western Wales
Institute of Chartered Foresters	Forestry	Western Wales
Confor	Forestry	Western Wales
Prince Albert Angling Association	Fisheries	Western Wales
Energy UK	Business/Industry	Western Wales
Country Land and Business Association	Land Management	Western Wales
Associated British Ports	Navigation	Western Wales
Bangor Mussel Producers	Fisheries	Western Wales
Pembrokeshire Wildfowl Association	Conservation	Western Wales
Pembrokeshire County Council	Local Authority	Western Wales
Royal Society for the Protection of Birds	Conservation	Western Wales
Milford Haven Surveillance Group	Conservation	Western Wales
Bridgend County Borough Council	Local Authorities	Western Wales
Food Standards Agency	Business/Industry	Western Wales
Conwy County Borough Council	Local Authority	Western Wales
Welsh Fisherman's Association	Fisheries	Western Wales
Natural Resources Wales (SEA)	Conservation and Recreation	Western Wales
Llandysul Angling Association	Fisheries	Western Wales
28 Individual Responses	Wide Ranging	Western Wales



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