

Vicky Schlottmann  
Environmental Assessment Team  
Natural Resources Wales

23<sup>rd</sup> March 2021

Dear Vicky,

## Strategic Environmental Assessment Screening Determination of Draft Western Wales River Basin Management Plan 2021-2027

Thank you for email of 22<sup>nd</sup> December 2020 consulting the Strategic Assessment Team (SAT) on the Strategic Environmental Assessment (SEA) screening determination of the draft Western Wales River Basin Management Plan (RBMP) 2021-2027. Our comments are made in the context of our responsibilities under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004.

We note that the second cycle RBMP 2015-2021 was subject to full SEA. We further note that the changes in this third cycle plan have been assessed as being minor modifications to the second cycle plan that will not generate any new or additional significant environmental effects.

**In summary, we agree with your conclusion that this third cycle River Basin Management Plan is not likely to have new or additional significant environmental effects.**

We have the following more detailed comments:

1. In relation to Table 1. Likely significance of effects on the environment of the RBMP as a whole, row 2 (f) '*the value and vulnerability of the area likely to be affected due to – i) Special natural characteristics or cultural heritage; ii) Exceeded environmental quality standards or limit values; or iii) intensive land use*'. We understand this question as being about the receiving environment, not about the plan itself. Therefore, the response given ('*The proposed revision of the third cycle WWRBMP will be a minor modification and will not significantly change the potential environmental effects set out in the ER2015.*'), which refers to the plan itself, is not fully answering this question. We consider that the receiving environment can change over time, for example 'environmental quality standards or limit values', and this potential for change is likely to be compounded due to changes resulting from leaving the EU, and developing Welsh and UK standards as time goes forward.
2. An example of this is the recent tightening of phosphate targets for Welsh riverine Special Areas of Conservation (SACs). We seek clarification as to whether these new, tighter targets have been taken into consideration in relation to question 2(f).

3. We advise that full SEA will, in our view, be required for the fourth cycle plan, due we understand in 2028, even if the changes from the previous cycles are minor. This is because by that time (i.e. 12 years since the last full SEA) there are likely to have been changes in both the receiving environment, and in environmental regulatory and legislative landscape since the last full SEA in 2015.

We hope that you find these comments useful, but if you would like to discuss any of these points further please do not hesitate to contact Anne MacDonald via the Strategic Assessment mailbox at [strategic.assessment@cyfoethnaturiolcymru.gov.uk](mailto:strategic.assessment@cyfoethnaturiolcymru.gov.uk)

Yours sincerely



**Caroline Hawkins**

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English