



Department
for Environment
Food & Rural Affairs



Llywodraeth Cymru
Welsh Government



Cyfoeth
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Wales



Environment
Agency

Statement of Particulars

Dee River Basin Management Plan

Natural Resources Wales Environmental Assessment Team

Updated December 2015

Natural Resources Wales

Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future

We will work for the communities of Wales to protect people and their homes as much as possible from environmental incidents like flooding and pollution. We will provide opportunities for them to learn, use and benefit from Wales' natural resources

We will work for Wales' economy and enable the sustainable use of natural resources to support jobs and enterprise. We will help businesses and developers to understand and consider environmental limits when they make important decisions.

We will work to maintain and improve the quality of the environment for everyone. We will work towards making the environment and natural resources more resilient to climate change and other pressures.

Environment Agency

We are the Environment Agency. We protect and improve the environment and make it a better place for people and wildlife.

We operate at the place where environmental change has its greatest impact on people's lives. We reduce the risks to people and properties from flooding; make sure there is enough water for people and wildlife; protect and improve air, land and water quality and apply the environmental standards within which industry can operate.

Acting to reduce climate change and helping people and wildlife adapt to its consequences are at the heart of all that we do.

We cannot do this alone. We work closely with a wide range of partners including government, business, local authorities, other agencies, civil society groups and the communities we serve.

1. Introduction

The Environmental Assessment of Plans and Programmes Regulations (Strategic Environmental Assessment (SEA) Regulations) requires that a Statement of Particulars is made available as soon as reasonably practicable after the adoption of the plan. This statement must demonstrate:

1. How environmental considerations have been integrated into the Dee River Basin Management Plan (RBMP) (**Section 2** of this document);
2. How the Environmental Report has been taken into account (**Section 3**);
3. How opinions expressed in response to the consultation on the Environmental Report have been taken into account (**Section 4**);
4. The reasons for choosing the Dee RBMP, as adopted, in the light of the other reasonable alternatives dealt with (**Section 5**); and
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the RBMP (**Section 6**).

River Basin Management Plans

The Dee RBMP has been produced by Natural Resources Wales. We worked with the Environment Agency for the parts of the River Basin District (RBD) that fall in England. The plans are a requirement of the Water Framework Directive (WFD) (2000/60/EC).

The plans describe the pressures facing the water environment and set objectives for rivers, lakes, estuaries, coastal and ground waters to cover the period 2015-2021. They outline the priority actions ('Measures') that are needed to improve the environment, the benefits those actions could achieve and who is best placed to deliver them. The measures seek to address the significant water management issues.

The 2015 plans are an update to first cycle plans published in 2009 as the WFD legislation requires that they are reviewed in six yearly cycles. The draft 2nd cycle Plan and the Environmental Report that documents the SEA were consulted on between October 2014 and April 2015.

2. How environmental considerations have been integrated into the Dee River Basin Management Plan?

The purpose of Natural Resources Wales is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future. The RBMP is aimed at improving the water environment which in itself is beneficial, however, in doing so there is the potential for wider environmental effects.

The draft RBMP proposed measures that would be required to get all waterbodies into good ecological status or potential by 2021, irrespective of cost. The consultation process has helped to prioritise the water bodies and measures and the final RBMP documents those that are achievable within the second cycle RBMP (2015-2021).

The waterbodies and measures were prioritised taking into account:

- Our statutory obligation to prevent deterioration,
- Our statutory obligation to achieve Protected Area objectives,
- Available resources,
- Stakeholder views,
- Commitments from partners,
- Our evidence of the environmental problem and solutions required.

For example, the plan proposes strategic and local measures that will help European Designated Sites (Special Areas of Conservation, Special Protection Areas and Ramsar Sites) with water dependent habitats and species meet the conservation objectives; with the overall aim of achieving favourable conservation status for each site.

The process of getting to a list of prioritised water bodies and measures in the RBD was aided by an integrated planning workshop. The relevant Natural Resources Wales technical experts with knowledge of the catchment were brought together in the workshop, including representatives from:

- Natural Resource Management Team (Including WFD lead, Conservation lead, Agriculture lead, Protected Sites lead)
- Analysis and Reporting Team (Including Water Quality leads and/or Biologist)
- Fisheries (technical)
- Flood Risk Management
- Geoscience Team
- Hydrology and Water Resources Team
- Forestry
- Knowledge, Strategy and Planning representatives (WFD Team)
- Natural Resources Planning Team (WFD co-ordinator)

The aim of the workshop was to consider:

1. What are the main pressures in the catchment?
2. Provide a summary of measures (and investigations) and outcomes delivered in the first cycle?
3. What measures (and investigations) will we target in the second cycle? Where?
4. Who do we need to involve?
5. When will we aim to implement measures?
6. What outcomes will we achieve?
7. What is the key opportunity which is unaffordable?
8. What is the main barrier to delivery in terms of mechanisms?

This process, coupled with the consideration of consultation responses allowed us to prioritise the water bodies and measures for delivery in the second cycle of the RBMP. By undertaking these integrated planning workshops, it ensured that all aspects of Natural Resource Management were considered in this process, thus maximising opportunities and minimising potential negative effects (direct, indirect or cumulative).

The detailed effects of implementation of measures at a project level are uncertain. However, we will undertake Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) of our projects where applicable and necessary under Natural Resources Wales or legacy body policy. This ensures we minimise environmental impact and maximise delivery of environmental benefits.

The Dee RBMP has been developed to the same timescales and study area as the Dee Flood Risk Management Plan (FRMP). The Floods Directive identifies that FRMPs and RBMPs are elements of integrated river basin management and that *“the two processes should therefore use the mutual potential for common synergies and benefits, having regard to the environmental objectives of Directive 2000/60/EC (Water Framework Directive), ensuring efficiency and wise use of resources”*.

The alignment of river basin management planning and flood risk management planning programmes and study areas has allowed consideration of how the plans interact and how Natural Resources Wales can work to deliver multiple benefits in the most efficient way, throughout the six year planning cycle. In order to aid integration of the Dee RBMP and FRMP, both plans set out a number of National Measures. These will promote delivery of measures required to improve the water environment when undertaking flood risk management activities.

It is also important to recognise how RBMP measures can benefit Flood Risk Management and work together to optimise this. For example, measures to reduce diffuse pollution pathways (i.e. control entry to water environment) by surface run-off and drainage management, will have obvious benefits to flood risk management. Other examples include improvement to the condition of riparian zone and/or wetland habitats by habitat improvements and fencing, or development and implementation of sediment management strategies or agricultural pollution prevention work.

3. How the Environmental Report has been taken into account.

It is important that any plan takes into account the environmental circumstances in which it is to be implemented. This is to ensure that unintended negative effects are avoided, as well as to identify the potential for delivery of multiple benefits.

The Environmental Report that was made available for public consultation alongside the draft plan documented the potential positive and negative effects of the proposed plan

measures and identified mitigation and opportunities for delivery of multiple benefits through delivery of projects and measures.

The summary of the likely significant effects of the plan on the wider environment and the mitigation proposed in the Environmental Report are summarised in Table 3.1.

Table 3.1

Ecosystem Service	Effect of Plan	Description of effect	Mitigation for negative effects
Provisioning Services			
Food (e.g. crops, fruit, fish)	Minor Positive	Increase in sustainable agriculture practices. Improvement in water quality benefitting Cockle and Shellfisheries. Improvements in fish passage opening up spawning habitat to improve fish populations.	
Water for Non-Consumptive Use (e.g. hydropower, navigation)	Minor Negative	Limiting of quantities of water available for abstraction at certain times.	Careful site selection, with works managed for the avoidance of local effects and appropriate consultation with affected parties undertaken.
Regulating Services			
Climate Regulation	Minor Positive	Ditch blocking to create areas of wetland, and planting buffer strips around forestry and along riparian corridors would increase the amount of carbon that is stored in the RBD and the climate regulation services provided by the catchment. Creation of habitat and green space in urban areas will provide a small carbon store but also provide local cooling and climate regulation.	

Water Regulation (e.g. flooding)	Minor Positive	Ditch blocking and creation of wetland areas will provide areas for water storage in the upper sections of the RBD, slowing rates of runoff and downstream conveyance and thus the risk of flooding; and increased vegetation and tree cover, and riparian planting will reduce surface water runoff rates and also stabilise banks from erosion, both of which will reduce the risk of flooding and improve the water regulation services provided by the RBD.	
Soil and Erosion Regulation	Minor Positive	Implementation of agricultural measures, including fencing of river banks to stop poaching, would reduce erosion in the short/medium term. Creation of wetland areas, increased tree and vegetation cover, forestry buffer strips and riparian zone management and planting, all associated with sustainable agricultural and forestry management practices, would reduce soil erosion due to increased soil stability and less exposure of soil to erosive processes.	
Water Purification and Waste Treatment	Minor Positive	Measures to reduce acidification and to implement sustainable agricultural and forestry practices, through wetland creations, forestry planting and forestry buffer strips, and also nutrient and riparian zone management, will positively affect water quality and the ability of the ecosystem to purify water. This will occur through a reduction in pollutants and other suspended material in the watercourses and also increased	

		<p>vegetation cover and reduced nutrient-rich runoff into water bodies.</p> <p>Measures to reduce pollutants in water from abandoned metal mines and coal mines, as well as from water treatment works through direct treatment of water, remediation projects and infrastructure improvements.</p>	
Cultural Services			
Cultural Heritage	Major negative	<p>Measures to disturb buried, unknown archaeology, which may have been preserved in peat or excavation and removal of weirs or obstructions could damage heritage assets.</p>	<p>Through the EIA process, individual projects will, at the earliest stage identify any designated or non-designated heritage assets, including the risk of unknown buried archaeology. This will establish the potential for adverse effects as well as opportunities for enhancement; inform project options and detailed design; and identify an appropriate mitigation strategy.</p>
Recreation and Tourism (including accessible blue and green space)	Minor positive	<p>Improved habitats for fish, through removal of barriers to fish passage and improvements to riparian and in-channel habitats and diversity, bringing greater recreational fishing interests to the RBD;</p> <p>Riparian planting, and land use changes from sustainable forestry and agricultural management would create habitat valued as a tourist and recreational resource, and contributed to a more pleasant network of water bodies to undertake recreational activities; and</p>	

		Reduction in pollution of water bodies from improvements to sewage infrastructure will improve the water environment for recreational and tourist use.	
Aesthetic Value (e.g. landscape, seascape, tranquillity)	Minor positive	<p>Land use changes, through creation of wetlands and planting of buffer strips and riparian zone management. Improvements to farmyard infrastructure, also leading to reduction in visible pollution of watercourses; and naturalising of river channels and estuary banks through removal of hard bank infrastructure, riparian planting and landscaping.</p> <p>Potential negative effects within the RBD include: Changes to valued landscape character through remediation of historic metal mines; and construction activities and utilities infrastructure at sewage treatment works and to improve Combined Sewer Overflows (CSOs).</p>	Potential negative effects will be mitigated through the EIA process. We will undertake early consultation with relevant landscape interests and, where necessary, will undertake landscape and visual impact assessments to inform scheme design and mitigation.
Supporting Services			
Provision of Habitat	Major positive	Sustainable agricultural and forestry management practices, including creation of wetlands, land use changes and riparian planting will enhance habitats and the ability of the ecosystem to provide habitat across the RBD. Removal of barriers to fish passage and naturalising of urbanised channels and coastlines would make new habitat available for fish and also increase the habitats on the riverbank for species such as otter and water vole.	

The process of undertaking the SEA for both RBMPs and FRMPs was aligned which promoted integrated planning and meant that the SEA was able to influence the plan.

As a result of Natural Resources Wales undertaking environmental assessment of our operations and plans at the appropriate scale, and our implementation of the national measures described above; the RBMP has given due regard to environmental considerations. Negative effects will be minimised and the delivery of multiple benefits promoted.

4. How opinions expressed in response to the consultation on the Environmental Report have been taken into account

Formal consultation was undertaken at scoping stage with publication of the scoping report to inform the scope of the SEA. We also engaged with the Strategic Assessment Team of Natural Resources Wales, Cadw, Natural England and English Heritage as Statutory Consultees in the SEA process, throughout the development of the plan.

A detailed summary of the responses received to the consultation on the Environmental Report is in Annex 1. This sets out each response received, summarises the comments made and sets out the actions we have and are taking to address the comments. A summary of the comments received to the specific SEA questions we asked, and the actions we are taking are set out below.

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 Services Approach. 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.

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. We agree that the HRA should take place alongside the preparation of the plan. The HRA was however, undertaken alongside and influenced the prioritisation of measures and the preparation of the final plan and was in place prior to finalising and approving the plan. We consulted Natural Resources Wales's Strategic Assessment Team on the draft HRA and the final HRA ahead of finalising and approving the plan.

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. 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".

Significant effects on the historic environment was a cause of concern for some respondents but generally it was felt that the potential effects have been overplayed. We felt it is important to flag these issues as potentially significant negative effects 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.

Some respondents felt that we underplayed the significant recreation and tourism benefits from delivery of the plan which will benefit fisheries. The monitoring we propose in Section 6 below should capture the actual effects to tourism and recreation derived from the improvement to fisheries.

There were suggestions that the plan should seek to deliver enhancements such as habitat creation and tree planting. 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. 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.

5. The reasons for choosing the Dee RBMP, as adopted, in the light of the other reasonable alternatives dealt with.

Natural Resources Wales developed five alternative approaches (scenarios) that were proposed in the Draft RBMP and assessed in the Environmental Report:

1. **Current measures (2015 baseline):** This option reflects the impact of ongoing measures (from the current plan) and trends (population growth and climate change) that will change the environmental baseline (2015 status) beyond 2015. Given the scale of ongoing actions to manage the quality of the water environment there is no true 'do nothing' option.
2. **Long Term Aspiration. Aim to achieve no deterioration, Protected Areas objectives and good overall status in all water bodies,** except those where alternative objectives are appropriate, e.g. due to natural conditions, disproportionate cost or technical infeasibility. (This is Scenario A in the RBMP).
3. **Statutory Objectives. Aim to achieve no deterioration and Protected Areas objectives.** That is the target for all water bodies linked to European Designated Sites to achieve good overall status. (This is Scenario B in the RBMP).
4. **Short Term Opportunities. Target improvements to good overall status by 2021 where Natural Resources Wales has a reasonable level of evidence that a short term outcome is achievable.** (This is Scenario C in the RBMP).
5. **Possible Outcomes.** Target improvements to good overall status by 2021 in water bodies where there is a greater certainty of funding and delivery through existing mechanisms (e.g. water company, Coal Authority and Natural Resources Wales forestry programmes). (This is Scenario D in the RBMP).

In the draft RBMP none of the alternatives considered the affordability of measures (in line with Welsh Government's guidance) or the effectiveness of mechanisms to deliver measures. Alternatives 2 and 3 describe what needs to happen to achieve statutory objectives, whilst 4 and 5 describe the opportunities to achieve short term (2021) improvements to good status.

The option taken forward by Natural Resources Wales, is a combination of Options 3 and 4. The proposed programme of strategic and local measures is based on Natural Resources Wales' current understanding of statutory objectives to prevent deterioration and achieve Protected Area objectives (Option 3), evidence of the issue and solution required to achieve an environmental outcome by 2021 (Option 4), and knowledge of available Natural Resources Wales resources and funding. The programme has been informed by stakeholder views expressed at Liaison Panels and through the consultation. Option 1 was not preferred because of the need for Natural Resources Wales to integrate and reprioritise its activities; option 2 was considered unaffordable and unrealistic; whilst option 5 had a high degree of uncertainty because of available information on partner programmes and Natural Resources Wales funding.

6. The measures that are to be taken to monitor the significant environmental effects of the implementation of the RBMP

This section sets out the monitoring that we propose to understand the significant effects of the plan in practice. The monitoring is focussed on those services where there are potentially significant effects (See Table 3.1). The indicators have to be practical, cost-effective and strategic, and must identify the effects of the plan itself, rather than on wider trends. Effects of significant individual projects will be monitored according to environmental action and/or monitoring plans devised during project level environmental impact assessment.

Table 6.1 Proposed sources of information for monitoring significant effects on the environment.

Ecosystem Service	Effect of Plan	Proposed Monitoring Indicator	Source
Provisioning Services			
Food (e.g. crops, fruit, fish)	Minor Positive	Amount and productivity of agricultural land. Cockle and Shellfish harvest statistics. Fish populations.	WG ¹ documents annual figures on the number of livestock and area and type of agricultural land across Wales. This data could be used to demonstrate strategic trends. Natural Resources Wales monitoring
Water for Non-Consumptive Use (e.g. hydropower, navigation)	Minor Negative	Abstraction licensing system	Natural Resources Wales reporting of water resource availability.
Regulating Services			
Climate Regulation	Minor Positive	Progress against Woodland Carbon Code (voluntary standard for UK woodland creation projects where claims are made about the carbon dioxide they sequester.)	Natural Resources Wales annual reporting against targets to facilitate woodland creation and improved management for carbon of existing woodland.
Water Regulation (e.g. flooding)	Minor Positive	Number of people and properties at risk of flooding.	Natural Resources Wales monitoring and modelling data sets.
Soil and Erosion Regulation	Minor Positive	Hydromorphology of waterbodies. Degree of naturalness to support achievement of Good ecological status or potential.	Ecological status of waterbodies – reported through the RBMPs.
Water Purification	Minor Positive	Chemical and Biological Water Quality	Ecological status of waterbodies – reported through the RBMPs.

¹ Farming Facts and Figures Wales 2015, Welsh Government.

Ecosystem Service	Effect of Plan	Proposed Monitoring Indicator	Source
and Waste Treatment			
Cultural Services			
Cultural Heritage	Major negative	Status of listed and non-listed historic features.	Project level EIA will identify potential effects on listed and non-listed historic features and will influence design to avoid, reduce or mitigate impacts. Cadw undertake a monitoring and management programme for state owned features.
		Unknown buried archaeological features or areas of archaeological potential to be monitored at individual project level.	Close liaison with Welsh Archaeological Trusts during project appraisal and design. Provide copies of reports (e.g. Desk Based Studies, Investigative Reports, Watching Brief Reports etc.) to Welsh Archaeological Trusts following project delivery.
Recreation and Tourism (including accessible blue and green space)	Minor positive	Visitor numbers. Recreational use by communities and visitors of water bodies and the surrounding catchments. Angling licence sales.	Natural Resources Wales reports on sales of Angling licences. Wales visitor survey, Wales tourism business survey. User numbers for coastal path and visitors to National Nature Reserves (visitor counters at certain locations) Visitor numbers to National Parks. Opportunities for projects to improve public access, interpretation and footpath and cycling networks, and enhance recreational and amenity land will be documented in the environmental outcomes.
Aesthetic Value (e.g. landscape, seascape, tranquillity)	Minor positive	There is potential for local effects subject to the location, type and design of projects	Through the EIA process we will undertake early consultation with relevant landscape interests and, where necessary, will undertake landscape and

Ecosystem Service	Effect of Plan	Proposed Monitoring Indicator	Source
			visual impact assessments to inform project design and mitigation.
Supporting Services			
Provision of Habitat	Major positive	Favourable conservation status of European Sites	Natural Resources Wales monitoring of the conservation status of European Sites. Natural Resources Wales performance indicator

Many existing programmes of monitoring will be reviewed on a regular basis by statutory reporting. However, the monitoring recommended to demonstrate the effects of implementation of the RBMP will be reviewed in the baseline scoping for the SEA of the third cycle of Plans to be published in 2021.

Annex 1: Summary of Consultation Responses and Actions Taken.

Organisation responding	Response to SEA	Action taken
Tidal Lagoon Power	<p>The Strategic Environmental Assessment (SEA) does not appear to have considered the potential for nationally significant tidal lagoon projects to come forward within the next RBMP plan period.</p> <p>It is noted that the review of plans, policies and programmes (as part of the SEA) has not identified progress on the roll-out of tidal lagoons.</p>	No action required. The SEA considered published policies and plans at a National scale, equivalent to the scale of the plan itself.
Water Health Partnership	<p>We ask for the creation of further 'safeguard zones' to ensure the necessary protection of bodies of water, in order to reduce the level of water treatment/purification required in future.</p> <p>Do the plans include consideration of climate change since hotter drier summers, warmer wetter winters and rising sea levels can have significant impacts on the environmental quality of the catchments and will also increase the impact of human activity on the water environment.</p>	<p>This issue to be considered in the finalisation of the Plan itself.</p> <p>Climate change has been considered in the evolution of the baseline with and without the plan implementation. This is documented in the Appraisal Summary Tables</p>
Farmers Union Wales	<p>Yes agree sufficient SEA has been conducted</p> <p>Concern has been expressed by the lack of waterway maintenance in recent years, resulting in large tracts of productive land becoming waterlogged for months. In the Union's view the devastating economic</p>	The SEA conducted is based purely on the environmental effects of the proposed measures, albeit the effects on population and human health does aim to predict effects on society. The economic considerations (affordability) are being factored into the prioritisation of the measures

	and social effects of flooding on the agricultural industry and rural communities are not adequately covered by this assessment.	
United Utilities	Priority area DrWPA if failing should be a priority funded by Natural Resources Wales	Issue considered in the finalisation of the Plan itself
Coed Cadw	<p>Air Quality benefits can be quantified through the Wrexham i-tree study methodology. The potential increase in urban air quality if more local authorities significantly increase their tree cover through SUDS and Green Infrastructure is therefore a benefit worth incorporating into the assessment. SUDS and GI would also contribute to 'water purification and waste treatment services' and should be mentioned.</p> <p>The Welsh Government's Pollinator Action Plan has not been taken in to account. 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/woodland habitat.</p> <p>The potential benefits of Green Infrastructure on biodiversity, recreation, landscape and tourism should be recognised, water purification and waste treatment services have not be adequately taken in to account.</p>	<p>We recognise the potential benefits of these measures if Local authorities were to significantly increase tree cover and SUDs. Air Quality was scoped out of the assessment as we considered the effects of <i>this plan</i> to be insignificant at a strategic scale.</p> <p>Noted. The benefits of tree planting have been considered in the plan itself and opportunities for tree planting are progressed, where feasible, through our projects and operations as mitigation or enhancement.</p>
Welsh Dee Trust	Agree SEA considers significant effects.	
Coal Authority	Agree SEA considers significant effects. The assessment takes into consideration the 'Metal Mines Strategy for Wales' document and priority list for waterbodies affected by abandoned coal mines.	No action required.
Confor	Awareness maintaining the balance between existing rural economic structure including forestry and its dependent industries and competing services e.g. Recreation and Tourism on the one hand and, say, Aesthetic Values on the other.	Noted, no action required.
Food Standards Agency	Agree SEA considers significant effects. We believe the measures outlined, including the Asset Management Plan (AMP) investigations and other improvements will deliver significant improvements across the life of the RBMPs. We are hopeful that any opportunities that have not been identified will become apparent as the known mitigation measures are carried out.	Noted

Energy UK	<p>We consider that the role of saltwaters in supporting thermally efficient energy production at estuarine and coastal thermal power plant in Wales should be recognised more clearly in Fig 2.1. Such plant have a role to play in the pathway to carbon neutral energy production in the coming decades.</p> <p>We note that remarks are made about reduction in the availability of water for non-consumptive use, which may affect the cooling of industrial plant. However, the accompanying figure (e.g. Western Wales Fig 4.2) suggests such remarks relate to freshwater. Since for estuarine and coastal thermal power plant water resource considerations would appear not to be relevant.</p>	<p>Fig 2.1 identifies Water for non-consumptive use as being relevant in terms of population and human health, water and material assets. Under the SEA receptors energy supply would fall under each of these categories.</p> <p>The potential effects of reduction of water available for non-consumptive use would only be applicable to freshwater which is a more limited resource.</p>
Country Land and Business Association (CLA) Cymru	<p>CLA Cymru does not believe that enough consideration has been given to the diversity of agriculture: in terms of farm type, geography, and topography or soil types. Once again, as these are local issues significantly different even within catchment areas, it is essential that local knowledge is used to inform actions.</p> <p>Our main concern is that the financial impact to the agricultural industry and private landowners has not been fully addressed. Funded intervention actions produce short-term results. With diminishing public funds, this is not a sustainable approach and more work must be done to encourage culture change and explore viable alternatives.</p>	<p>Noted. The RBMP is a high level document but supported by significant local considerations, data and knowledge. Local knowledge will be important in the delivery of the measures and must be considered.</p> <p>Affordability was considered in the finalisation of the Plan itself.</p>
Natural England	<p>COMMENTS RELATE ONLY TO THE ENGLISH SIDE OF THE DEE.</p> <p>The plan must be fully compliant with the Habitats Directive and subject to necessary HRA, the approach to which is under discussion in England.</p> <p>Further work is required to update and clarify Protected Area objectives with NE, Natural Resources Wales and EA working closely to refine targets and objectives for the Dee Natura site.</p> <p>The draft Dee RBMP is an important opportunity to progress catchment wide planning and engage public in the process. A substantial amount of info is available through Catchment Data Explorer and Water Watch Wales.</p> <p>Management catchment summary is helpful in providing specific info. The final version could include info on actions needed to meet Natura Protected Areas Objectives.</p> <p>RBMP measures need to be consistent with measures needed to achieve Natura 2000 Protected Area objectives as in the Dee SIP.</p> <p>Consultation does not include an HRA. As competent authorities EA and Natural Resources Wales are required to produce one and it should</p>	<p>Agree that the HRA should take place alongside the preparation of the plan. Limited resources and pressures on programme did not allow this. The HRA is however, being undertaken alongside and is influencing 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 (SAT) and Natural England on the draft HRA ahead of finalising and approving the plan.</p> <p>Issue to be considered in the finalisation of the Plan itself.</p> <p>Issue to be considered in the finalisation of the Plan itself.</p>

	<p>consider measures required to achieve Natura 2000 Protected Area objectives and look both alone and in combination with other plans and projects.</p> <p>The SEA findings are set out in the ER. We have no particular issues with the SEA as it applies to the English side.</p> <p>Potential mitigation and enhancement measures will be more apparent when local measures are planned in greater detail than has been possible at this management catchment scale.</p>	<p>See comment above</p> <p>Noted. Mitigation is documented in Table 3.1 above.</p>
North Wales Wildlife Trust	<p>Local Wildlife Sites (SINCS) do not seem to have been considered as part of the SEA process and should be. Local Wildlife Sites can play a pivotal role in delivering: Biodiversity 2020: A strategy for England's wildlife and ecosystem service; Wales' Biodiversity Framework and Biodiversity Action Plans</p> <p>INNS do not seem to have been considered in the significant effects and should be.</p> <p>We would like to see more opportunities to deliver wildlife enhancement measures that help to achieve WFD objectives such as habitat creation, enhancement and management within the Dee RBD. Examples include the creation and expansion of woodlands and the reduction of grazing (in the upper catchment in particular) to help better manage water flow through catchments and the effects unnatural flows can have.</p> <p>* We support the eventual reintroduction of Eurasian Beaver (Castor fiber) onto the Dee as a measure to achieve WFD objectives, particularly with regard to their activities that help to moderate water flow through catchments, stabilise rivers and reduce bank erosion, trap sediments and reduce nutrient levels.</p>	<p>The RBMP is a high level document but supported by significant local considerations, data and knowledge. Local sites will be important in the delivery of the measures and must be considered.</p> <p>Measures relating to INNS were assessed in the SEA and the benefits recognised. This is detailed in the Appraisal Summary Tables which can be provided upon request.</p> <p>Issue considered in the finalisation of the Plan itself. Also a consideration for mitigation / enhancement as set out in Table 3.1 above.</p>
Snowdonia National Park Authority (SNPA)	<p>SEA covers significant effects, however there should be an acknowledgement that the land-use planning system and policies set out in Local Development Plans can prevent/mitigate any potentially adverse impacts of works requiring planning consent – therefore, as an example, the potential Major Negative indirect effects of the RBMP on Cultural Heritage, Recreation and Tourism (Table 4.3 of the Environmental Report) may be overstated.</p>	<p>Noted and to be included in mitigation and considered during measure delivery.</p>
Flintshire County Council	<p>The plan is holistic and focused on delivering achievable targets/measures and everybody has the responsibility to ensure the</p>	<p>Issue considered in the finalisation of the Plan itself.</p>

	<p>success of the plan. However, there is need for a stronger evidence base to support the plan.</p> <p>Integration with Agri-environment Schemes and the RDP. Future Glastir and agri-environmental programmes have the potential to deliver positive benefits for both landowner and the Dee RBD/Supporting Services. It is important that programmes are structured and delivered in such way as to yield these mutual benefits</p> <p>Recognising the value of ecosystems in terms of benefits provided to the whole of society is a major step in providing a positive policy narrative for water bodies and associated biodiversity. The process of evaluating environmental and social facilities should develop a greater appreciation and will facilitate an effective compromising process. Therefore care should be taken not to ignore or devalue spiritual and cultural aspects of the plan.</p>	Issue considered in the finalisation of the Plan itself.
Natural Resources Wales	<p>Welcome and support RBMP process and commitment to SEA</p> <p>HRA should be undertaken iteratively with the plans development. Inappropriate to approve or finalise the RBMP until all relevant assessment processes are complete.</p>	Agree that the HRA should take place alongside the preparation of the plan. Limited resources and pressures on programme did not allow this. The HRA is however, being undertaken alongside and is influencing 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 (SAT) on the draft HRA ahead of finalising and approving the plan.
Natural Resources Wales	Concern regarding the use of ecosystems services topics being used in place of topics stipulated by SEA Directive. Eg Material assets covers more than “food”, “water for non-consumptive use” and “recreation and tourism”.	Noted. Feed into lessons learnt.
Natural Resources Wales	Rec and Tourism section doesn’t appear to have considered Bathing Waters Directive standards. Water quality could be affected by some proposed actions. Should consider timing of works to avoid bathing water season	This would have been considered under water quality, but perhaps not explicitly. This is an interrelationship and we will consider how we can explicitly demonstrate that the SEA has considered it through lessons learnt.
Natural Resources Wales	There is potential tension between measures to enable fish passage and the effectiveness and appropriateness of flood measures. This may need to be considered in project level EIA and HRA.	Included in mitigation in SOP. Project level EIA will be undertaken.
Natural Resources Wales	Draft plan states that we will propose a prioritised programme of measures that will help European designated sites meet conservation objectives. It is unclear if this is presented in the draft plan or will be presented in the final plan. If the latter then there is concern that SAT will not have an opportunity to comment.	Protected sites officers have been involved in the prioritisation exercise. SAT will get an opportunity to comment through the HRA consultation.

Natural Resources Wales	Indirect and cumulative effects. The review of other plans and programmes does not constitute an assessment of cumulative effects	Indirect and cumulative effects were considered in the AST's and in the ER.
Natural Resources Wales	Table 5.1 monitoring the effects of the plan. It would be useful if this could list the potential significant effects for which the specific monitoring is proposed.	Addressed in SOP
Natural Resources Wales	Reference is made to potential effects on features of historic interest, archaeological and historic building assets, but no reference is made to potential effects on the integrity or component parts of registered historic parks and gardens and landscapes listed in the Register of Landscapes of Historic Interest in Wales. The Register of Landscapes of Historic Interest in Wales should be considered in the PPP Review	Effects on cultural heritage have been considered at a strategic scale, on a precautionary basis. Mitigation and monitoring have been set out in the SOP.



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