

**Working Together Consultation 22 June 2018 to 22 December 2018
Written Consultation Response**

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<u>Response summary</u>	<p><u>Delete as appropriate;</u></p> <p><u>Yes I would like a copy of this response to be included in a summary for the next consultation</u></p> <p>Any response you send us will be seen in full by NRW staff dealing with the issues which this consultation is about. It may also be seen by other NRW staff to help them plan future consultations.</p> <p>NRW intends to publish a summary of the responses. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.</p> <p>Names or addresses we blank out might still get published later, though we do not think this would happen very often.</p> <p>For further information about how NRW processes personal data and your rights please see our privacy notice on our website https://naturalresources.wales/?lang=en</p> <p>The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including NRW. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would</p>

	get in touch with the person and ask their views before we finally decided to reveal the information.
Would you like your details to be added to our WFD stakeholder list to keep you updated on this work.	<u>Delete as appropriate;</u> YES
At what scale are you responding?	<u>Delete as appropriate;</u> All Wales

Consultation Questions

- 1) Does the programme set out include all of the significant steps necessary to review and update the River Basin Management Plans?

Yes.

- 2) How do you want to work with us in updating the River Basin Management Plans? Please include what level of involvement (inform, consult or working together to solve problems) you want and specify what methods you would prefer?

Energy UK would be happy to work with Natural Resources Wales for generic or sector level issues. Our members would be keen to work at individual power station level, if that would be helpful, on individual water body or catchment scale issues in order to shape the content of the plans rather than reacting to a draft plan.

- 3) Do you have suggestions on how we can improve our communication with you for updating the River Basin Management Plans? Have we identified the right organisations that need to be involved in reviewing and updating the River Basin Management Plans? (see Appendix 5)

We note that Pembroke Power Station has been identified as an example of a type of industry. Whilst Pembroke is an important installation, there are other thermal power stations and thermal power plant sites in Wales, both nuclear and non-nuclear fuelled, owned and operated by a variety of companies, as well as renewable energy (hydropower) interests. It would be useful to identify Energy UK and the British Hydropower Association explicitly as representative bodies through which to engage the power sector on Water Framework Directive related matters. However, it is also likely that individual installation owners would be willing to engage on local-scale issues (see (2) above).

- 4) (a) Have we identified all the plans and strategies that affect, or are affected by the River Basin Management Plans? See Appendix 3. If not, please tell us what other plans and strategies we need to be aware of?

Yes.

- (b) Can you identify any opportunities to integrate the River Basin Management Plans with other plans and strategies?

Depending on the detail of the transition of water resource abstraction licensing into Environmental Permitting Regulations (EPR), there may be value in ensuring integration/alignment/streamlining of abstraction planning (such as CAMS), permit review rounds (within EPR) and future River Basin Management Plan (RBMP) cycles (depending on the outcomes of the European Commission's Fitness Check on the Water Framework Directive).

- (c) How do you think the consultation on the updated River Basin Management Plans and Flood Risk Management Plans can best be co-ordinated?

We have no comment on this question.

- 5) What opportunities can you identify in developing Area Statements that would join up with the River Basin Management Plans?

Area Statements will clearly be an important source of information for River Basin Management Planning and the statutory elements of the RBMPs will provide an important backdrop for the Area Statements. It is important to recognise that the RBMP process has at its heart the principle of Water Framework Directive Article 4, which ensures that the statutory targets should be set in such a way as not to incur disproportionate costs in the Programme of Measures to achieve them. Integral to this is assessment of potential future benefits, and this may have some strong overlap with the 'benefits' aspects of the role of Area Statements. Consistency and common approaches are essential in the areas of overlap.

- 6) Do you have any comments on how we can get the best out of our new Wales Water Management Forum, as it continues to deliver the role of the Liaison Panels, but takes on a greater role mirroring the work of the Wales Land Management Forum?

The WWMF should include representation of renewable and thermal energy interests at sector level as both interact with the aquatic environment.



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- 7) We propose to explain how we have considered your response to this consultation when we consult on the significant water management issues in 2019. Previously, we have published a response document for each consultation. Are you satisfied that this is a reasonable approach?

Yes.