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Hafren Dyfrdwy Drought Plan 2025–30

Water Framework Directive
Compliance Assessment

Contents

Introduction

Background

Hafren Dyfrdwy has a statutory duty to prepare and publish a Drought Plan every five years under Sections 39B and 39C of the Water Industry Action Act 1991, as amended by the Water Act 2003, and in accordance with the Drought Plan Regulations 2005 and the Drought Plan Direction (Wales) 2017.

Hafren Dyfrdwy's Drought Plan 2025-2030 (herein referred to as the Drought Plan) details measures that will be taken to maintain supplies to customers under drought scenarios, including an Emergency Drought Order as defined in the Water Resources Act 1991 (as amended).

The Drought Plan contains a number of management actions, the implementation of which are determined by a series of drought triggers. The management actions include: five demand-side measures (e.g. water use restrictions) and one supply-side measure (e.g. increase the availability of water).

This report provides a Water Framework Directive (WFD) compliance assessment to demonstrate that Hafren Dyfrdwy's Drought Plan will fulfil WFD obligations by ensuring that the demand-side and supply-side measures support the environmental objectives set out in River Basin Management Plans (RBMP), including preventing deterioration, achieving protected area objectives and achieving water body status objectives.

Water Framework Directive Assessment Overview

Legislation

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, typically referred to as the Water Framework Directive or WFD, established a framework for the protection of both surface and groundwaters, a system to improve and/or maintain the quality of waterbodies across the European Union (EU), and set key objectives for the general protection of aquatic ecology, unique and valuable habitats, the protection of drinking water resources and the protection of bathing water.

The WFD Directive was initially transposed into English and Welsh law by The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003, that was subsequently revoked by the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (herein referred to as the WFD Regulations) following the EU exit by the United Kingdon (UK).

In order to be compliant with the WFD Regulations, any activity which has the potential to have an impact on WFD water bodies must be assessed to determine whether it could cause deterioration in the ecological status or potential of a water body. The UK aims to reach good status in inland and coastal waters by 2027 or as soon as natural conditions permit after 2027.

Regulation 18 of the WFD Regulations makes provisions for exemptions for temporary deterioration of status as a result of circumstances of natural cause or force majeure which are exceptional or could not reasonably have been foreseen, in particular extreme floods or prolonged droughts. Natural Resources Wales (NRW) guidance[1] confirms that Regulation 18 can apply to the implementation of drought plan measures providing all conditions have been met and justification provided.

[1] NRW (2024). *Water Company Drought Plan Technical Guidance Version 2.0 dated July 2024*. Natural Resources Management Business Group, Sustainable Land and Water Technical Group and Water Policy and Planning Group.

River Basin Management Plans

RBMPs provide the mechanism for implementing and ensuring an integrated approach to the protection, improvement and sustainable management of the water environment, published on a six-yearly cycle. They set the legally binding locally specific environmental objectives that underpin water regulation and planning activities.

The third cycle RBMPs (2021-2027) describe:

- the current state of the water environment;
- pressures affecting the water environment;
- environmental objectives for protecting and improving the waters;
- the programme of measures and actions needed to achieve the objectives; and
- progress since 2015.

WFD Status Classification

Under the WFD Regulations, surface water bodies are classified as rivers, lakes or transitional and coastal waters (TraC). In addition, they can be characterised as natural water bodies, heavily modified water bodies (HMWB) or artificial water bodies (AWB).

The overall status of water bodies is determined on the basis of their ecological and chemical status (natural surface water bodies) or their ecological potential and chemical status (HMWBs and AWBs) and can be classified as High, Good, Moderate, Poor or Bad. Good status is achieved when the surface water body is assessed as having at least good for both ecological status (biology, physico-chemical, specific substances and hydromorphology supporting elements) and chemical status (priority substances).

Groundwater status is determined by its quantitative status (water quantity/water balance) and its chemical status (water quality). The overall classification (High, Good, Moderate, Poor or Bad) of a groundwater body is determined based on the worst case classification from both its quantitative and chemical status.

Every surface water body and groundwater body have an assigned status with the current status of these water bodies set out in the RBMPs as updated in 2022.

WFD Assessment Approach

There is no specific or prescribed format or process for WFD compliance assessments, however, guidance produced by the UK Water Industry Resources (UKWIR)[2] has been followed where appropriate in the approach taken for this WFD compliance assessment.

WFD Assessment Objectives

Regulation 13 of the WFD Regulations details the environmental objectives for surface water bodies, groundwater bodies and protected areas. Based on these legally binding environmental objectives, the following objectives have been set against which the Drought Plan can be compliance tested:

- Objective 1: To prevent deterioration of any WFD element of any water body.
- Objective 2: To prevent the introduction of impediments to the attainment of 'Good' WFD status or potential for any water body.
- Objective 3: To ensure that the legally binding planned programme of measures in the current RBMP to protect and enhance the status of water bodies are not compromised.
- Objective 4. To assist the attainment of objectives for associated WFD protected areas.

Data Collection and Collation

A variety of online sources have been used to provide information on relevant water bodies, WFD status and linked protected areas including: NRW[3]; DataMapsWales[4]; Joint Nature Conservation Committee (JNCC)[5].

Assessment Methodology

The WFD compliance assessment was undertaken based on a sequential two-stage approach that included:

- **Stage 1 - WFD Screening**: a preliminary high-level assessment to identify any risk of deterioration in WFD status of any water body as a result of a drought action.
- **Stage 2 - WFD Assessment**: an assessment of water bodies and their quality elements that are considered likely to be affected by changes in hydro-morphological and/or physico-chemical water quality from a drought action.

The WFD compliance assessment also considers any cumulative effects between proposed drought actions and with other similar plans where there may be spatial overlaps with Hafren Dyfrdwy's Drought Plan.

Supporting Information

An Environmental Assessment Report (EAR) has been completed for each supply-side option, with or without the requirement of a Drought Permit. These provide an assessment of potential environmental effects of implementing a supply-side option including the ecological and chemical status of relevant water bodies. The EAR also identifies mitigation actions that may be implemented to reduce any risk in WFD status.

[2] UKWIR (2021). *Environmental Assessment Guidance for Water Resource Management Plans and Drought Plans (21/WR/02/15)*. UK Water Industry Resources, London.
[3] https://naturalresources.wales/
[4] https://datamap.gov.wales/maps/new?layer=geonode:nrw_wfd_cycle_3_classifications#/
[5] https://jncc.gov.uk/

Description of Plan

Location and Setting

Hafren Dyfrdwy is a water and wastewater company which provides around 58 million litres of water per day, to approximately 97,000 households and 8,000 business customers in a supply area covering mid and northeast Wales and which crosses three River Basin Districts (RBDs), that include the Western Wales, Dee and Severn RBDs (Figure 1).

Natural Resources Wales (NRW) manage the Western Wales RBD, with NRW and the Environment Agency jointly responsible for the management of the Dee and Severn RBDs.

Figure 1: Hafren Dyfrdwy Water Supply Area and River Basin Districts

Outline Description of Plan

Hafren Dyfrdwy's Drought Plan sets out short-term actions to monitor and manage the impact of drought on their customers and the environment. The Drought Plan complements the long-term strategic management of water resources contained within Hafren Dyfrdwy's Water Resources Management Plan (WRMP) published in 2024.

The Drought Plan contains a number of management actions, the implementation of which are determined by a series of drought triggers (River Dee and for Llandinam and Llanwrin Water Resource Zone). The management actions include five demand-side measures and one supply-side measure.

Demand-side Measures

Demand-side measures can be applied anywhere in Hafren Dyfrdwy's supply area to reduce the demand for water from its network and customers during drought conditions.

The Drought Plan contains five demand-side measures, two of which are triggered in extreme drought situations, that include:

- **standard demand-side measures:**
    - **water efficiency measures** – promoted during normal operational conditions and intensified as the Dee Storage System and/or groundwater sources in the Llandinam and Llanwrin WRZ moves from a developing drought to a drought;
    - **increased leakage management** – increased leakage management activities to find and fix leaks as the Dee Storage System and/or groundwater sources in the Llandinam and Llanwrin WRZ moves from a developing drought to a drought;
    - **voluntary use restriction** – customers asked to make voluntary restrictions on the water they use as the Dee Storage System and/or when the Llandinam and Llanwrin groundwater moves from a drought to a severe drought;
- **extreme demand-side measures:**
    - **temporary water use restrictions** – introduction of Temporary Use Bans (TUBs) and ultimately an application for a drought order in extreme situations; and
    - **restrictions on non-essential use through a drought order** – extension of restrictions imposed on domestic customers to non-domestic customers.

Supply-side Measures

Supply-side measures are those that increase the availability of water within the system. The Drought Plan has only one supply-side action for the augmentation of the River Dee with water from Lower Pen-y-Cae Reservoir (Figure 2). It should be noted that the supply-side option for the augmentation of the River Dee does not require the abstraction or impoundment outside the schedule of any existing licence to increase the amount of water abstracted to supplement supplies, and therefore does not require a drought permit and no allowance has been made in the Drought Plan for any such application.

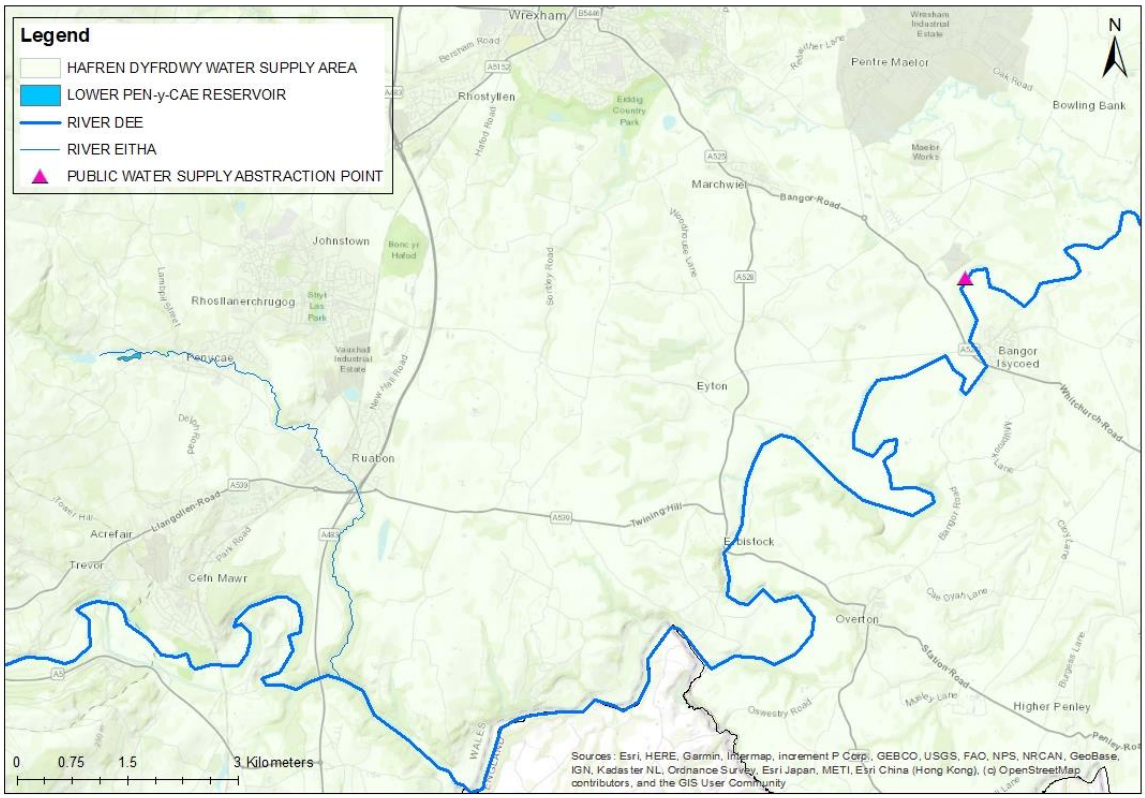

Figure 2: Location of Supply-side Option for the Augmentation of the River Dee

During normal conditions, abstraction from the River Dee at Bangor-on-Dee is constrained by licence conditions and assumes the maximum abstraction does not exceed the '*safe yield allocation*' as established by the Dee General Directions (DGD) that regulate the River Dee.

Under the Dee General Directions, as the status of the Dee Storage System moves from '*developing drought*' to '*drought*' Hafren Dyfrdwy is required to further reduce its abstraction from the River Dee below '*safe yield allocations'* by specified volumes depending on the storage in the Dee Storage System, as detailed in Table 1. How these reductions are made is dependent upon Hafren Dyfrdwy and can be either through reducing abstraction, or by augmenting the River Dee with water from a different source, in this case water from the Lower Pen-y-Cae Reservoir.

Table 1: Dee General Directions and Drought

Abstractor	Maximum Daily Authorised Quantity (Ml/d)	Safe Yield Allocation Net (Ml/d)	Stage 1 Maximum Allocation Net (Ml/d)	Stage 2 Maximum Allocation Net (Ml/d)	Stage 3 Drought General Directions (Ml/d)
Hafren Dyfrdwy at Bangor-on-Dee	45.5	41.5	41.3	41.1	Dee Consultative Committee (DCC) agreed reduction
Severn Trent Water at Boughton (Barrelwell Hill)	36	28.8	28.6	28.4	DCC agreed reduction

As the Dee Storage System enters drought, the River Dee would be augmented with 0.4 Ml/d of stored raw water from the Lower Pen-y-Cae Reservoir, negating the requirement for a 0.2 Ml/d net reduction in abstraction at Bangor-on-Dee and 0.2 Ml/d reduction in abstraction by Severn Trent Water at Chester. As the Dee Storage System moves from drought to severe drought the augmentation would increase from 0.4 to 0.8 Ml/d.

During a drought event water would be pumped from the Lower Pen-y-Cae Reservoir to the Trefechan Brook / River Eitha by the installation of a temporary pumping station, that would abstract water from the top level of the reservoir and convey water via a pipe placed over the spillway. The duration for augmentation will be dependent on the storage in the Dee Storage System, but is assumed to be less than six months.

WFD Compliance Assessment

WFD Screening

Screening of Demand-side Measures

Table 2 presents the screening of WFD compliance for the five demand-side measures. All of these actions have been screened-out from any further assessment as there is no risk of deterioration in the WFD status of any water body as a result of their implementation during drought conditions.

Table 2: WFD Screening of Demand-side measures

Demand-side measures	Water Body Code and Name	Water Body Type	Screened as WFD Compliant	Screening Rationale
Water efficiency measures	N/A	N/A	Yes	No risk of deterioration in WFD. All of the actions are to decrease consumer demand and reduce pressure on water resources and rates of abstraction for public water supplies with a likely net positive effect on water bodies during drought conditions.
Increased leakage management	N/A	N/A	Yes	
Voluntary use restriction	N/A	N/A	Yes	
Temporary water use restrictions	N/A	N/A	Yes	
Restrictions on non-essential use through a drought order	N/A	N/A	Yes	

Screening of Supply-side Measures

The screening of WFD compliance for the one supply-side action is presented in Table 3 and has identified that there is a potential risk of deterioration in WFD status from the augmentation of the River Dee from the Lower Pen-y-Cae Reservoir requiring further assessment.

Table 3: WFD Screening of Supply-side measures

Supply-side measures	Water Body Code and Name	Water Body Type	Screened as WFD Compliant	Screening Rationale
Augmentation of the River Dee from the Lower-Pen-y-Cae Reservoir	GB31134451: Pencaye Bottom Reservoir	Lake	No	The supply-side option to augment the River Dee from the Lower Pen-y-Cae Reservoir will use stored raw water that is sourced from the Trefechan Brook. Although this is water that would naturally flow to the Eitha and Dee rivers there is a potential temporary risk of deterioration in WFD status from the release of stored water during drought conditions.
	GB111067052050: Eitha	River	No	
	GB111067052060: Dee – Ceiriog to Alwen	River	No	
	GB111067057080: Dee Chester Weir to Ceiriog	River	No	
	GB531106708200: Dee (North Wales)	Transitional	Yes	There will be no deterioration in the status of transitional waters of the Dee Estuary from the augmentation of the River Dee from the Lower Pen-y-Cae Reservoir.

WFD Assessment: Augmentation of the River Dee

Baseline Conditions

Table 4 presents a summary of the current WFD status for all relevant water bodies carried forward for assessment into the augmentation of the River Dee from the Lower Pen-y-Cae Reservoir.

Table 4: WFD Status (RBMP Cycle 3) and Confidence Rating

Parameter	GB31134451: Pencaye Botton Reservoir	GB111067052050: Eitha	GB111067052060: Dee – Ceiriog to Alwen	GB111067057080: Dee Chester Weir to Ceiriog
Waterbody Type	Lake	River	River	River
Designation	Heavily Modified	Heavily Modified	Heavily Modified	Heavily Modified
Overall Waterbody Status	**Good**	**Good**	**Good**	**Moderate**
Overall Ecological Status	**Good**	**Good**	**Good**	**Moderate**
Biological Quality	Not assessed	Good	Good	Good
Fish	-	Good (uncertain)	-	-
Invertebrates	-	High (quite certain)	High (very certain)	High (quite certain)
Macrophytes and Phytobenthos Combined	-	-	Good (quite certain)	Good (quite certain)
Macrophyte Sub-element	-	-	High (very certain)	Good (quite certain)
Phytobenthos Sub-element	-	-	Good (quite certain)	Good (uncertain)
Physico-Chemical Quality	Not assessed	High	Good	Good
Ammonia (NH_3)	-	High (quite certain)	High (very certain)	High (very certain)
Biochemical Oxygen Demand (BOD)	-	-	High (very certain)	High (very certain)
Dissolved Oxygen	-	High (quite certain)	High (very certain)	High (very certain)
pH	-	High (very certain)	High (very certain)	High (very certain)
Phosphate (P)	-	High (very certain)	High (very certain)	Good (very certain)
Temperature	-	High (uncertain)	High (uncertain)	Good (uncertain)
Hydromorphological Supporting Elements	Not assessed	Not assessed	Not assessed	Not assessed
Specific Pollutants	Not assessed	High	High	High
2,4-dichlorophenol	-	High (very certain)	High (very certain)	High (very certain)
2,4-dichlorphenoxyacetic acid (2,4-D)	-	High (very certain)	High (very certain)	High (very certain)
Arsenic	-	-	High (very certain)	High (very certain)
Chlorothal	-	High (very certain)	High (very certain)	High (very certain)
Copper	-	-	High (very certain)	High (very certain)
Chromium VI	-	-	-	High (very certain)
Diazinon	-	-	High (very certain)	High (quite certain)
Dimethoate	-	High (very certain)	High (very certain)	High (very certain)
Glyphosate	-	High (very certain)	High (very certain)	High (very certain)
Iron	-	-	High (very certain)	High (very certain)
Linuron	-	High (very certain)	High (very certain)	High (very certain)
Manganese	-	-	High (very certain)	High (very certain)
Mecoprop	-	High (very certain)	High (very certain)	High (very certain)
Phenol	-	-	High (very certain)	High (very certain)

Parameter	GB31134451: Pencaye Botton Reservoir	GB111067052050: Eitha	GB111067052060: Dee – Ceiriog to Alwen	GB111067057080: Dee Chester Weir to Ceiriog
Toluene	-	-	-	High (very certain)
Triclosan	-	-	High (very certain)	High (very certain)
Zinc	-	-	High (very certain)	High (very certain)
Chemical	**Not assessed**	**High**	**High**	**Moderate**
Priority Hazardous Substances	-	High	High	Moderate
Antracene	-	-	High (very certain)	High (very certain)
Cadmium	-	-	High (very certain)	High (very certain)
Endosulfan	-	-	High (very certain)	High (very certain)
Hexachlorocyclohexane (HCH)	-	High (very certain)	High (very certain)	High (very certain)
Nonylphenol (NP) (4-nonlyphenol)	-	-	High (very certain)	High (very certain)
Pentachlorobenzene	-	High (very certain)	High (very certain)	High (very certain)
Polyaromatic hydrocarbons (PAH)	-	-	-	Moderate
Tributyl tin compounds (TBT) (tributyltin-cation)	-	-	High (very certain)	High (very certain)
Trifluralin	-	High (very certain)	High (very certain)	High (very certain)
Priority Substances	Not assessed	High	High	High
1,2-dichlorphenol	-	-	High (very certain)	High (very certain)
Aclonifen	-	High (very certain)	High (very certain)	High (very certain)
Alachlor	-	High (very certain)	High (very certain)	High (very certain)
Atrazine	-	-	High (very certain)	High (very certain)
Benzene	-	-	High (very certain)	High (very certain)
Bifenox	-	High (very certain)	High (very certain)	High (very certain)
Clorvinfos	-	High (very certain)	High (very certain)	High (very certain)
Chlorphyrifos (chlorphyrifos-ethyl)	-	High (very certain)	High (very certain)	High (very certain)
Dichloromethane	-	-	High (very certain)	High (very certain)
Dichlorvos	-	-	High (very certain)	High (very certain)
Diuron	-	High (very certain)	High (very certain)	High (very certain)
Fluoranthene	-	-	-	High (very certain)
Isoprotron	-	High (very certain)	High (very certain)	High (very certain)
Lead	-	-	High (very certain)	High (very certain)
Nickel	-	-	High (very certain)	High (very certain)
Octylphenol	-	-	-	High (very certain)
Pentachlorophenol	-	High (very certain)	High (very certain)	High (very certain)
Quinoxyfen	-	High (very certain)	High (very certain)	High (very certain)
Simazine	-	High (very certain)	High (very certain)	High (very certain)
Terbutryn	-	High (very certain)	High (very certain)	High (very certain)
Trichloromethane (chloroform)	-	-	High (very certain)	High (very certain)
Other Pollutants	Not assessed	High	High	High
Carbon-tetrachloride	-	-	-	High (very certain)
Drins	-	High (very certain)	High (very certain)	High (very certain)
Para-para-DDT	-	High (very certain)	High (very certain)	High (very certain)

Water Body Assessment Against Quality Elements

This section provides a site-specific assessment of the augmentation of the River Dee from the Lower Pen-y-Cae Reservoir against WFD quality elements.

A summary of potential impacts and the risk of deterioration is provided in Table 5. The risk of deterioration is expressed against a risk scale of negligible to high.

Table 5: WFD Assessment of the Augmentation of the River Dee from Lower Pen-y-Cae Reservoir

Potential WFD Impact	GB31134451: Pencaye Botton Reservoir	GB111067052050: Eitha	GB111067052060: Dee – Ceiriog to Alwen	GB111067057080: Dee Chester Weir to Ceiriog
Hydromorphology	Water levels in the Lower Pen-y-Cae Reservoir would decrease at a faster rate than under normal conditions. However, the abstraction for the augmentation of the River Dee would be within licence limits and would not extend beyond the minimum operating volume of the reservoir. Negligible risk of deterioration	The release of water from the Lower Pen-y-Cae Reservoir to the Trefechan Brook / River Eitha will maintain flows in the Eitha and Dee water bodies. The augmentation would release flows of up to 0.8 Ml/d that equates to 0.2% of the Q95 flow (Q95 = 530 Ml/d) downstream of the confluence with the River Dee (River Dee at Manley Hall). Negligible risk of deterioration.		
Biological: Fish, Invertebrates, Macrophytes and Phytobenthos	Not applicable	The release of 0.4 Ml/d to 0.8 Ml/d of water from the Lower Pen-y-Cae Reservoir to the Trefechan Brook / River Eitha during drought conditions is likely to be of benefit for any instream aquatic flora and fauna in the Eitha water body and which is likely to outweigh any potential effects from any potential physico-chemical differences between water released from the reservoir and the baseline conditions in the Trefechan Brook / River Eitha. No effects are predicted on the biological elements in the River Dee from the augmentation from the Lower Pen-y-Cae Reservoir. Negligible risk of deterioration.		
Physico-Chemical Quality / Chemical Water Quality	Not applicable	Lower Pen-y-Cae Reservoir has historically had diluted concentrations of aluminium, iron, lead, manganese and zinc above Environmental Quality Standards (EQS) from bottom of the water column in the deepest part of the reservoir likely due to stratification. More recent water samples would indicate that water in the Lower Pen-y-Cae Reservoir does not exceed any EQS for freshwater and is not predicted to have any adverse effects on water quality in the Trefechan Brook / River Eitha. No adverse effects are predicted on the physical-chemical status in the River Dee due to the dilution between the flow rates in the River Dee and the contribution of 0.2% from any augmentation. Abstraction of water from the top level of the Lower Pen-y-Cae Reservoir using a temporary pumping station will minimise the release of sediments into Trefechan Brook / River Eitha. There is the potential for a difference in the levels of dissolved oxygen (DO_2) and temperature of water in the Lower Pen-y-Cae and River Eitha. However, the differentiation will be dependent upon the flow conditions in the River Eitha during a drought event. Temporary low risk of deterioration.		

Protected Areas: European Sites including Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site.	Not applicable	Not applicable	A Habitat Regulations Assessment (HRA) undertaken for the Drought Plan that included the augmentation of the River Dee from Pen-y-Cae Reservoir found no likely significant effects on the River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) SAC, Dee Estuary / Aber Dyfrdwy SAC, Dee Estuary and Dee Estuary Ramsar site. Negligible risk of deterioration.
Protected Areas: Other including Drinking Water (DrWPA), Nitrate Vulnerable Zones (NVZ) etc.	It is assessed that the augmentation of the River Dee from the Pen-y-Cae Reservoir will not pose a risk to any other protected areas. Negligible risk of deterioration.		

Assessment Against WFD Programme of Measures

The Dee River Basin District in England Programme of Measures: Mechanisms Summary[6] provides details of the Programme of Measures that provide the statutory and non-statutory mechanisms needed to implement a particular measure.

Part of the WFD compliance assessment is to consider the Programme of Measures and assess whether any of the drought actions can contribute to them or prevent any of them from being delivered.

Hafren Dyfrdwy's Drought Plan is unlikely to impede achievement of the Programme of Measures contained in the Dee RBMP.

[6] Dee River Basin District in England programme of measures: mechanisms summary - GOV.UK (www.gov.uk)

Cumulative Assessment

There are no potential cumulative effects between the demand-side and supply-side measures of Hafren Dyfrdwy's Drought Plan.

The potential cumulative effects on WFD water bodies between Hafren Dyfrdwy's Drought Plan and other water company's drought plans have been assessed and the results of the scoping are shown in Table 6.

Table 6: Scoping of Cumulative Effects

Drought Plan	Scoped In / Out	Rationale
Welsh Water Drought Plan 2020	Out	No overlapping zone of influence of the augmentation of the River Dee from the Pen-y-Cae Reservoir.
Severn Trent Water Drought Plan 2021	Out	No overlapping zone of influence of the augmentation of the River Dee from the Pen-y-Cae Reservoir.
United Utilities Drought Plan 2022	Out	No overlapping zone of influence of the augmentation of the River Dee from the Pen-y-Cae Reservoir.
Environment Agency River Severn Drought Order	Out	No overlapping zone of influence of the augmentation of the River Dee from the Pen-y-Cae Reservoir.

Summary of WFD Compliance Against WFD Objectives

The WFD compliance assessment has taken into consideration all the demand-side and supply-side measures in Hafren Dyfrdwy's Drought Plan. Taking into consideration anticipated effects from the supply-side measure for the augmentation of the River Dee from the Pen-y-Cae Reservoir on the biological, physico-chemical and hydromorphological elements, it is considered that Drought Plan alone and cumulatively will be compliant with the WFD objectives (Table 6).

Table 7: Compliance of Drought Plan with WFD Objectives

Objective	Summary of WFD Compliance	Rationale
Objective 1: To prevent deterioration of any WFD element of any water body	Compliant with WFD objective	All options in the Drought Plan if required to be implement are unlikely to result in a deterioration of status of any WFD element in any water body in line with Regulation 13 of the WFD Regulations.
Objective 2: To prevent the introduction of impediments to the attainment of 'Good' WFD status or potential for any water body	Compliant with WFD objective	All options in the Drought Plan if required to be implemented are unlikely to prevent any water body from attainment of 'Good' status in line with Regulation 13 of the WFD Regulations.
Objective 3: To ensure that the legally binding planned programme of measures in the current RBMP to protect and enhance the status of water bodies are not compromised	Compliant with WFD objective	All options in the Drought Plan if required to be implemented are unlikely to impede achievement of the Programme of Measures for the Dee RBD.
Objective 4. To assist the attainment of objectives for associated WFD protected areas	Compliant with WFD objective	Although all options in the Drought Plan if required to be implemented do not directly assist with the attainment of objectives, the demand-side and supply-side options will have some indirect benefits in line with Regulation 13 of the WFD Regulations.

In conclusion, it is considered that Hafren Dyfrdwy's Drought Plan has a negligible to low risk of temporary or permanent deterioration in WFD status of any water body or would prevent any water body from attainment of '*Good*' status or '*Good Ecological Potential*" and complies with all the requirements of the WFD Regulations.

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