



# DRAFT WATER RESOURCES MANGEMENT PLAN 2024

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## SEA Screening Statement

Report for: Hafren Dyfrdwy

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SEVERN TRENT WATER (Severn Trent)

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WRW/WRMP24 Supply Options and Environmental Appraisal

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**Contact:**

Rachel Ashmole, Ricardo Energy & Environment  
Bright Building, Manchester Science Park, Pencroft  
Way, Manchester M15 6GZ, UK

T: +44 (0) 1235 753 085

E: [rachel.ashmole@ricardo.com](mailto:rachel.ashmole@ricardo.com)

**Author:**

Katie Moran, Jenni Smalley

**Approved by:**

Rachel Ashmole

**Signed**



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**Front cover image:**

Llyn Clywedog (Clywedog Reservoir), near Llanidloes, Wales

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# 1. INTRODUCTION

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## 1.1 THIS DOCUMENT

This document outlines the Strategic Environmental Assessment (SEA) screening carried out by Ricardo Energy & Environment (Ricardo) on behalf of Hafren Dyfrdwy in relation to its Draft Water Resources Management Plan 2024 (dWRMP24).

## 1.2 PURPOSE OF THE WRMP

The dWRMP24 demonstrates how Hafren Dyfrdwy intends to meet the demand for water and protect the environment over the planning period from 2025 to 2085. Over the 60 years which the plan covers, Hafren Dyfrdwy are not projecting a deficit in the supply-demand balance. The dWRMP24 will therefore include no new supply schemes. However, even without a supply-demand deficit, Hafren Dyfrdwy proposes to include demand management measures in the final planning scenario to reflect customer expectations and Government priorities.

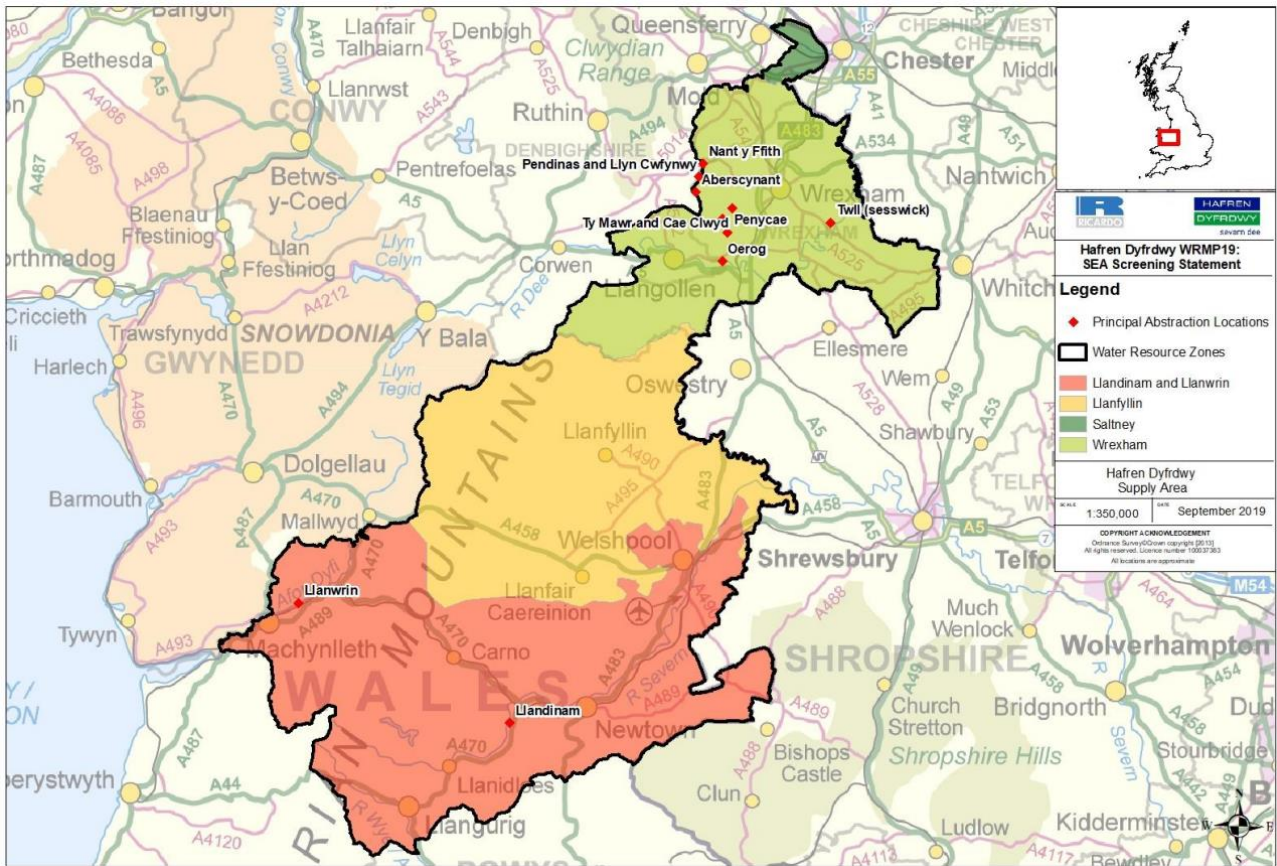
These will include:

- Water Labelling, no building regs, low scenario
- Retrofitting indoor water efficiency devices
- Home water efficiency check with social housing
- Education team water efficiency messaging
- Enhanced/Innovation led household water efficiency
- Leakage Management

## 1.3 THE WRMP AREA

The dWRMP24 covers the Hafren Dyfrdwy region of supply, covering parts of North East and mid Wales, including Wrexham, as shown in **Figure 1**. Hafren Dyfrdwy provides around 60 million litres of water per day, to a population of approximately 220,000. Hafren Dyfrdwy customers comprise approximately 97,000 households and 8,000 business customers.

Figure 1 Operational Area



## 1.4 THE WRMP AND THE SEA SCREENING PROCESS

The objective of a Strategic Environmental Assessment (SEA) is to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development. For a WRMP, the aim of SEA is to identify the potential impact of options proposed in the plan in terms of their environmental, economic and social effects. If any adverse effects are identified, these options can then be avoided or proposals modified to manage or mitigate adverse effects. Additionally, it facilitates consultation and compliments consideration of Habitats Regulations<sup>1</sup> and Water Framework Directive (WFD) implications for the WRMP.

For certain plans, SEA is required under Statutory Instrument 2004 No.1633 - The Environmental Assessment of Plans and Programmes Regulations 2004. The SEA Regulations transposed the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. Following the UK's exit of the EU and the end of the transition period (31<sup>st</sup> December 2020), the SEA Directive no longer applies to the UK.

The SEA Regulation 5 requires “an environmental assessment ... of certain plans and programmes which are likely to have significant effects on the environment”. Plans and programmes are defined as those:

- “which are subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and
- which are required by legislative, regulatory or administrative provisions” (Regulation 2 (1)).

Guidance produced by the European Commission (EC)<sup>2</sup> indicates that in preparing plans for ensuring water resources, privatised utilities companies can be considered an authority because they are providing services that would be carried out by public authorities in a non-privatised regime. The preparation of a WRMP is a statutory requirement and therefore meets the requirements of Regulation 2.

Plans and programmes that may have significant effects on the environment are identified as those:

- “which are prepared for... water management... and which set the framework for future development consent of projects listed in Annexes I and II to Directive 85/337/EEC [the Environmental Impact Assessment Directive]; or
- which, in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of Directive 92/43/EEC [the Habitats Directive]” (Regulation 5 (2)).

Broadly, this includes plans that may include development of infrastructure to source, store, transfer or manage water, or may affect sites that have European designations (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites).

This SEA screening has been prepared in accordance with the requirements of the SEA Regulations. The Practical Guide to SEA<sup>3</sup> has also been taken into account.

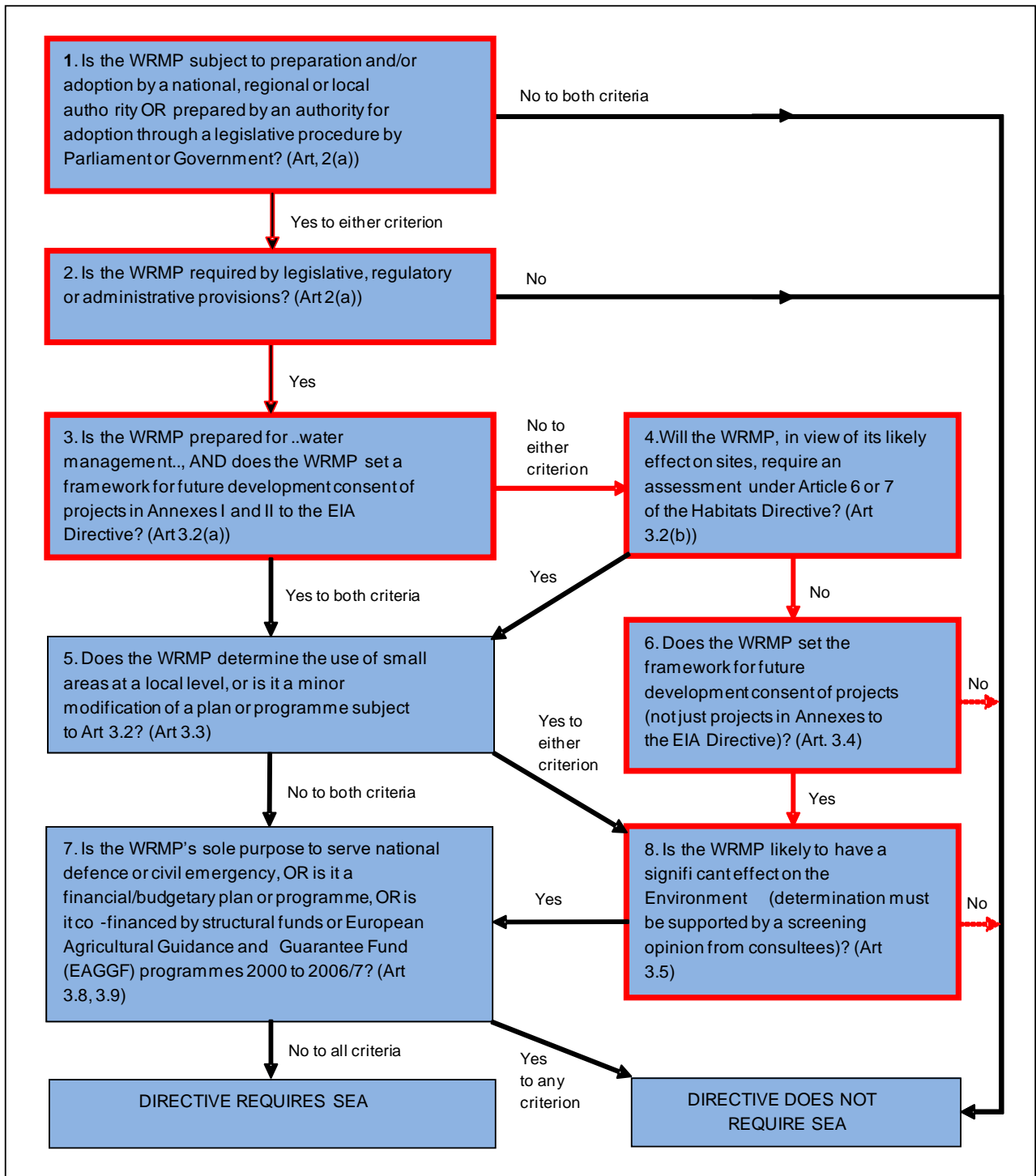
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<sup>1</sup> The Conservation of Habitats and Species Regulations 2010 (as amended)

<sup>2</sup> EC (2003) Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment. Available online: [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf)

<sup>3</sup> A Practical Guide to the Strategic Environmental Assessment Directive: Practical Guidance on Applying European Directive 2001/42/EC, Office of the Deputy Prime Minister, 2005.

Figure 2 SEA requirement in relation to Hafren Dyfrdwy's WRMP



## 2. THE SEA SCREENING PROCESS

### 2.1 THE REQUIREMENT FOR SEA

Government<sup>4</sup>, regulator<sup>5</sup> and industry<sup>6</sup> guidance indicates that there is a requirement for water companies, as responsible authorities, to determine if their WRMPs fall within the scope of the SEA Regulations and whether a SEA must be undertaken. The Welsh Government's guidance<sup>7</sup> on WRMPs, meanwhile, identifies environmental legislation relevant to the WRMP. As it is possible that the draft WRMP could affect England and Wales, the UK SEA Regulations, as opposed to the Welsh SEA Regulations,<sup>8</sup> will apply.

As stated in the SEA Regulations, the requirement for a SEA applies to plans, programmes and strategies. A SEA is only required if the plan is likely to have 'significant environmental effects' as detailed in Regulation 9(3):

*"Where the responsible authority determines that the plan, programme or modification is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination."*

The screening process forms the first stage of SEA and determines whether a SEA is required for a plan or programme. The Practical Guide to SEA<sup>9</sup> provides a framework for determination of the requirement for SEA (the screening process) in a staged flow-diagram (see **Figure 2**).

In accordance with **Figure 2**, the Practical Guide to SEA sets out eight criteria that should be considered when screening a plan, programme or strategy to determine whether it will require a SEA. These are set out in **Table 1**.

Table 1 ODPM Assessment

	Screening Question	Screening Assessment
1	Is the plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament or Government?	<b>Yes</b> The WRMP sets out how Hafren Dyfrdwy (the "Responsible Authority") will meet the demand for water and protect the environment over the next 60 years planning period from 2025 to 2085 for the supply area.
2	Is the plan required by legislative, regulatory or administrative provisions?	<b>Yes</b> The development of a WRMP is a statutory requirement for water companies in England and Wales and must be published every five years. The WRMP will also be publicly available, has been prepared in a formal way and will involve consultation with interested parties.
3	Is the plan prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications,	<b>No</b> The plan is prepared for the management of water resources and it does not contain any supply options

4 Office of the Deputy Prime Minister (ODPM), Scottish Executive, Welsh Assembly Government and Department of the Environment Northern Ireland (2005) A Practical Guide to the SEA Directive and European Commission (2001) Assessment of plans and projects significantly affecting Natura 2000 sites and Welsh Government (2015) Strategic Environmental Assessment (SEA) in Wales

5 EA, OfWAT and NRW (2022) Water Resource Planning Guidance [online]. Available at:

<https://www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-planning-guideline>

6 UKWIR (2021) Environmental Assessment Guidance for Water Resources Management Plans and Drought Plans. Report Ref. No. 21/WR/02/15

7 Welsh Government (2022) The Welsh Government Guiding Principles for Developing Water Resources Management Plans (WRMPs) 2022. Available at: <https://gov.wales/sites/default/files/publications/2021-12/water-resources-management-plan-guidance-2022.pdf> Accessed August 2022]

8 Statutory Instrument 2004 No. 1656 The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

9 A Practical Guide to the Strategic Environmental Assessment Directive: Practical Guidance on Applying European Directive 2001/42/EC', Office of the Deputy Prime Minister, 2005.



	Screening Question	Screening Assessment
	tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	therefore it does NOT set a framework for future development consent of projects.
4	Will the plan, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive	<b>No</b> The demand management options will not have Likely Significant Effects (LSEs) on any European sites as they relate to measures which will help to reduce (or prevent increases to) water abstraction (e.g. reducing water leakage and reducing water consumption through promotion of water efficiency measures). Any works required in relation to the leakage management options (e.g. leak repairs, installing water meters) are largely implemented within residential properties, in urban areas and are of a scale that would not lead to LSEs on any European sites.
5	Does the plan determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	<b>No</b> The WRMP covers the Hafren Dyfrdwy water supply area.
6	Does the plan set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	<b>No</b> The WRMP does not set the framework for future development consent of projects. The WRMP does not set out any specific needs or locations.
7	Is the plan sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000-2006/7?	<b>No</b> The purpose of the WRMP is not to serve national defence or a civil emergency and it is not a financial or budget plan.
8	Is it likely to have a significant effect on the environment?	<b>No</b> This WRMP sets out the strategic aims and ambitions for water resource management across the Hafren Dyfrdwy supply area. Over the 60 years which the plan covers, a deficit is not projected therefore no new supply schemes are proposed. However, Hafren Dyfrdwy proposes to include demand management measures in the final planning scenario to reflecting customer expectations and Government priorities.  The demand management measures are largely constrained to residential properties and significant effects are not likely.

## 2.2 DERMINATION OF SIGNFICANCE

In accordance with the SEA Regulations, the likely significant effects of the dWRMP24 have been considered in relation to the SEA Screening criteria and Hafren Dyfrdwy consider that the SEA is not required for the dWRMP24. However, before this conclusion can be ratified it is necessary to consult with statutory consultees on this screening statement.

### 3. CONCLUSION

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The scope of the Hafren Dyfrdwy draft WRMP24 has been considered against the criteria for the Practical Guide to SEA<sup>10</sup> and the SEA Regulations. It is considered that the draft WRMP will not set a framework for future development consent of projects. No supply options are included in the draft WRMP and, instead, the focus is on delivering demand management measures only. The demand management options will not have Likely Significant Effects (LSEs) on any European sites as they relate to measures which will help to reduce (or prevent increases to) water abstraction (e.g. reducing water leakage and reducing water consumption through promotion of water efficiency measures). Any works required in relation to the leakage management options (e.g. leak repairs, installing water meters) are largely implemented within residential properties, in urban areas and are of a scale that would not lead to LSEs on any European sites.

Following the methodology for WFD compliance assessment set out in the Water Resources West (WRW) WRMP WFD methodology report<sup>11</sup> demand-side options can be screened as WFD compliant activities. None of these options would cause deterioration in WFD status, impede the target of Good WFD status or impede the success of any RBMP2 water body measures in any WFD water bodies. As a result of this, the Hafren Dyfrdwy dWRMP24 is assessed as WFD regulations compliant. These options are considered to have a beneficial impact on the water environment as they will reduce the need to abstract more water

For these reasons, it is considered that the Hafren Dyfrdwy draft WRMP24 is not likely to have any significant environmental effects and a SEA is not required.

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<sup>10</sup> A Practical Guide to the Strategic Environmental Assessment Directive: Practical Guidance on Applying European Directive 2001/42/EC', Office of the Deputy Prime Minister, 2005.

<sup>11</sup> Ricardo & Wood (2022) Water Resources West Regional Plan and Water Resources Management Plans 2024, Water Framework Directive: Method Statement, Report for Water Resources West, July 2021



T: +44 (0) 1235 75 3000

E: [enquiry@ricardo.com](mailto:enquiry@ricardo.com)

W: [ee.ricardo.com](http://ee.ricardo.com)