

Working for biodiversity

Complying with the Environment (Wales) Act
2016 section 6 duty

December 2019

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FOREWORD



As the only waste & water company wholly in Wales, Hafren Dyfrdwy can bring a unique perspective to helping deliver Welsh Government's environmental vision. We are excited about playing our part in creating a better future for Wales. Since our launch in July 2018, we have worked hard to understand the needs of our customers, stakeholders and policy makers and built our plans accordingly.

Our PR19 plan clearly states that ensuring compliance with regulatory standards is our responsibility and a critical foundation to maintaining customers' trust in us. Welsh legislation looks to us to go further and actively enhance the environment – not simply prevent deterioration – and we are fully committed to doing so.

Our region covers only 14% of Wales but it is striking that 60% of that area is protected through Site of Special Scientific Interest (SSSI) or Special Area of Conservation (SAC) designations. Our stewardship of the Lake Vyrnwy estate, along with the upland reservoirs around Wrexham, presents an exciting opportunity to explore a range of solutions for maintaining and enhancing biodiversity, and promoting the resilience of ecosystems. There are no shortage of prospective partner organisations who share our vision and we look forward to working with them and yourselves, to build on our biodiversity plan.

With best wishes

Liv Garfield



Working for biodiversity

1. Introduction

At Hafren Dyfrdwy we recognise how important our natural environment is to the well-being of our employees and customers and we are fully committed to playing our part in the vision to create a better future for Wales. We are committed to environmental leadership and embrace the new approach to sustainable management of natural resources in Wales.

During the development of our 2020-25 Business Plan, our proposals for environmental improvements were strongly supported by extensive customer engagement. Our customer insights work revealed a deep connection between customers, their community, the local environment and their wish that we should protect and improve it wherever we can. We have a wonderful opportunity in AMP7 to put this into practice with our project at Lake Vyrnwy. Widely recognised as the most beautiful lake in Wales, we are honoured to have stewardship of this diverse estate and will be working in partnership with the RSPB, Natural Resources Wales, United Utilities and the local community to improve habitats to encourage rare species such as the curlew and golden plover to return, and enhance the experience for our visitors, bringing them closer to nature at the site than ever before.

About Hafren Dyfrdwy

In February 2017, Dee Valley Water became part of the Severn Trent group. In May 2018, Ofwat approval was received to align the boundaries of Severn Trent and Dee Valley Water to the national boundaries of Wales and England. In line with this approval, we launched our new Welsh water company, Hafren Dyfrdwy on 1 July 2018.

Hafren Dyfrdwy is a water and wastewater company which provides around 58 million litres of water per day, to a population of approximately 220,000 in the area of mid and north east Wales. Our customers comprise approximately 97,000 households and 8,000 business customers.

Typically, around 61% of our raw water comes from the River Dee, 5% from a series of impounding reservoirs, 30% from boreholes and the remaining 4% from a spring source. Water is treated at five treatment works and is then supplied to customers through a network of approximately 2,600 km of water mains, 100 pumping stations and 85 clean water storage reservoirs.

We own approximately 100km² (10,000 hectares) of land across our supply area, as well as sites where we have rights of access and work with the landowner to maintain land. These range from operational sites such as water treatment works, sewage treatment works or service reservoirs to our visitor experience sites at Vyrnwy and Clywedog and provide plenty of opportunities for maintaining and enhancing biodiversity, and promoting the resilience of ecosystems.

Alignment to Welsh Government policy and ambition

In September 2018, we submitted our draft Business Plan for the period 2020 to 2025 (referred to as Asset Management Plan (AMP) 7) to Ofwat, the economic regulator for the water industry in England and Wales. This plan is based on 18 months of listening to our customers and key stakeholders and discussing the issues that are important to them. It unashamedly takes a long term view: it delivers for customers today and puts the building blocks in place for delivering for customers in 30 years' time, protecting these vital services for future generations. In addition to commitments to keeping water bills the lowest in Wales and improving services for customers, we set out our ambitions for improving the environment:

- We're planning the largest statutory environmental programme in our part of Wales for over 20 years, improving around 22km of river.
- We're investing to improve 450 hectares of upland peat bog around Lake Vyrnwy, something that will make the area more attractive for visitors as well as protecting and enhancing our precious environment.

We are fully committed to playing our part in the vision to create a better future for Wales. We have taken time to get to know our customers, stakeholders and policy makers to understand what is expected and how we can add value and align our long term plans to drive towards these goals. We are clear that ensuring compliance with regulatory standards is our responsibility and is a critical foundation to maintaining customers' trust in us. We serve a comparatively small area of Wales but 60% of that area is on land that is protected as either SSSI or SAC. Legislation in Wales looks to us to go further and to actively enhance the environment, not simply prevent deterioration and we are fully committed to this.



2. Environment (Wales) Act 2016 – section 6 biodiversity duty

We are committed to environmental leadership and embrace the new approach to the sustainable management of natural resources in Wales. The investment proposed in our 2020-25 Business Plan will help our region's environment to thrive and ensure we make our contribution to achieving the Welsh Government's vision for the future management of natural resources and the well-being of future generations in Wales. Our customers share our ambition.

The emphasis of the section 6 duty is that we **should embed the consideration of biodiversity and ecosystems** into our early thinking and business planning, including any policies, plans, programmes and projects as well as our day to day activities. We are required to produce a plan setting out how we will comply with the duty; Welsh Government guidance suggests that best practice would be for the plan to be an integral part of any business planning, asset management and/or corporate planning processes as this will demonstrate how the consideration of biodiversity is being embedded within the public authority.

Our draft Water Resources Management Plan, submitted to Welsh Government in December 2017, set out our commitment to meeting the duty and contributing to delivery of Welsh Government's well-being goals. Proposed actions include:

- enhancing biodiversity and promoting the resilience of ecosystems through responsible management of our land and via our investment plan;
- ensuring all employees are aware of the impact of their activities on biodiversity and ecosystems through the development and implementation of training;
- basing improvements on environmental impact assessments and ecological surveys;
- seeking opportunities for working with partners and local communities to maintain and enhance the biodiversity at our publicly accessible sites; and
- developing a robust catchment management programme which will take account of findings set out in Natural Resources Wales' State of Natural Resources Report (SoNaRR) and the subsequent Area Statements.

Our PR19 business plan built on these commitments, setting out our investment plans for improved biodiversity on a minimum of 450 hectares of land during AMP7. In addition, we continue to actively engage with NRW regarding how we can contribute to the Area Statements covering our supply area.

In preparation for AMP7, we are continuing to build on these plans and table 1 sets out in detail how we are developing actions to comply with the section 6 duty, in reference to the Nature Recovery Action Plan (NRAP) for Wales objectives.

Table 1 - Hafren Dyfrdwy actions against NRAP for Wales objectives

NRAP for Wales Objective	Hafren Dyfrdwy actions – current and future
Engage and support participation and understanding to embed biodiversity throughout decision making at all levels.	<ul style="list-style-type: none"> • High level statement demonstrating commitment to and responsibility for complying with the section 6 duty at a corporate level has been written into our Water Resource Management Plan 2019¹ (published in September 2019) and our draft PR19 Business Plan² which was submitted to Ofwat in September 2018, with a revised plan submitted in April 2019. • Production of our ‘Working for Biodiversity’ action plan which will be rolled out across the business, highlighting the need to embed enhancement of biodiversity and promotion of ecosystem resilience into design of projects and standard operating procedures by the end of AMP6 (March 2020). • Review of current environmental management e-learning modules to ensure they are still fit for purpose and highlight the importance of biodiversity and ecosystem resilience.
Safeguard species and habitats of principal importance and improve their management.	<ul style="list-style-type: none"> • Delivery against a biodiversity NEP driver to implement ‘quick win’ habitat creation or restoration measures identified by site audit/investigation. This could include actions such as changes in land management practices; biodiversity enhancement measures at visitor experience sites; contributions to national pollinator strategy, and/or partnership working opportunities. • Through our biodiversity audits, identify any section 7 list species and habitats present across our estate and develop management plans to protect, and where possible, increase / enhance them. • Working in partnership with RSPB and the local community through a HLF funded project, we will sustainably manage a large area of the Lake Vyrnwy estate to create a landscape scale haven for curlew, merlin, hen harrier and black grouse to once more breed successfully at the site and help repopulate surrounding areas. RSPB’s management plan for the reserve sets out how the conservation and biodiversity improvement works will be continued and maintained beyond the life of the HLF project. • Work with neighbouring water companies, NRW and the Middle Dee Catchment Partnership to continue to protect and enhance the River Dee SAC through a catchment management approach. Support NRW’s Dee LIFE project. • Sign up to Welsh Government’s ‘Bee Friendly’ scheme and commit to becoming a Pollinator-Friendly organisation.
Increase the resilience of our natural environment by restoring degraded habitats and habitat creation.	<ul style="list-style-type: none"> • Working in partnership with RSPB and the local community through the HLF funded project on the Lake Vyrnwy estate, we will: <ul style="list-style-type: none"> ○ Achieve favourable Conservation Status on 4,500 ha of SAC/SSSI Moorland by 2023 ○ Return 65 ha of former conifer plantation to functioning blanket bog habitat

¹ <https://www.hdcymru.co.uk/about-us/plan-and-strategy/water-resource-planning/water-resource-management-plan/>

² https://www.hdcymru.co.uk/content/dam/hdcymru/about-us/pr19/hdd_pr19_business_plan_r.pdf

	<ul style="list-style-type: none"> ○ Removal of INNS from across 4 major habitat types, contributing towards 90% of the nature reserve being clear. ● Seek opportunities to work with neighbouring landowners to achieve improvements and benefits beyond the boundaries of our own estate.
Tackle key pressures on species and habitats.	<ul style="list-style-type: none"> ● Working in partnership with RSPB and the local community through the HLF funded project on the Lake Vyrnwy estate, we will: <ul style="list-style-type: none"> ○ Alleviate predator pressure across 6000 ha of sites, in order to allow key ground nesting populations to recover and return ecosystem balance ○ Engage 20+ farms / landowners in the benefits of managing for wildlife, in order to positively influence a management coverage of (approximately 1000 ha) of upland habitats for curlew
Improve our evidence, understanding and monitoring.	<ul style="list-style-type: none"> ● Deliver against a biodiversity NEP driver to carry out an investigation into scales and types of habitats on Hafren Dyfrdwy owned land, including SSSIs & incorporating an audit of Section 7 priority species on major operational sites. ● Working with NRW to feed into the Area Statements process and SONaRR 2. ● Undertaking invasive non-native species (INNS) risk assessments across our key operational sites and for water transfers, as part of the AMP7 National Environment Programme agreed with NRW. ● Feed into the Wales-wide INNS framework to better understand source and pathways for key INNS.
Put in place a framework of governance and support for delivery.	<ul style="list-style-type: none"> ● Biodiversity ODI for AMP7 which commits us to improving at least 450 hectares of land for biodiversity between 2020 and 2025. This will be monitored by Ofwat and we will be subject to a penalty at the end of the AMP if we fail to deliver. ● We have an active Environment Community of Practice with representatives from across the business, which has a focus on developing awareness, skills, operating procedures and standards to ensure Severn Trent & Hafren Dyfrdwy become environmental leaders. ● Provision of a 'Boost for Biodiversity' fund throughout AMP7 which provides organisations from across our region to bid for funding for projects or ideas that will make a positive difference to the water environment. Projects can cover a wide range of causes, including preservation of our region's biodiversity; rural and urban pollution; community engagement; control of INNS; natural flood management; river restoration; improving river water quality. ● Engage with Public Service Boards and other public authorities within our supply area to identify opportunities for joint working to maximise benefits to local ecosystems.