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ESW Drought Plan 2027 Habitats Regulations Assessment Screening Report

April 2026

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CONTENTS

Tables

Figures

1 INTRODUCTION

1.1 Background and Purpose of this Report

Under the Water Industry Act 1991, Northumbrian Water Group (NWG) is required to prepare and update a Drought Plan for each of its supply areas. This document focuses on the Essex & Suffolk Water (ESW) supply area. The Drought Plan must be approved by the Secretary of State for Environment, Food and Rural Affairs and made available for public consultation.

Our ESW Drought Plan 2027 is a tactical plan which will provide a comprehensive statement of the actions we will consider implementing during drought conditions to safeguard essential water supplies and minimise environmental impact within our supply area. The plan will align with our Water Resources Management Plan (WRMP), which sets out the strategic approach to maintaining a supply-demand balance over a 25-year planning period.

A water company must ensure its Drought Plan meets the requirements of the Habitats Regulations before implementation. The requirement for a Habitats Regulations Assessment (HRA) is established through the Conservation of Habitats and Species Regulations 2017 (as amended). Under Regulations 63 and 105, any plan or project which is likely to have a significant effect on a European Site (either alone or in-combination with other plans or projects) and is not directly connected with, or necessary for the management of the site, must be subject to a HRA to determine the implications for the site in view of its conservation objectives.

This Habitats Regulations Assessment (HRA) Screening Report has been prepared in support of the development of our Drought Plan 2027. Further information about HRA and the rationale for applying it to the Drought Plan is provided in Section 1.2.

1.2 HRA Context

The amended 2017 Habitats Regulations created a national site network including:

- Special Areas of Conservation (SACs) designated under the Habitats Directive (92/43/EEC) and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance.
- Special Protected Areas (SPAs) classified under the Birds Directive (2009/147/EC) for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species).
- Designated wetlands of international importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats. As a matter of policy, all Ramsar sites are protected in the same way as SACs and SPAs.

- The National Planning Policy Framework (NPPF)[1], states that potential Special Protection Areas (pSPA) and possible Special Areas of Conservation (pSAC), proposed Ramsar sites[2] on which the Government has initiated public consultation on the scientific case for their designation, should also be considered European Sites.

For ease of reference through this HRA report, these designations are collectively referred to as "European Sites**."** As per Natural England guidance, any HRA should also consider any European Marine Protected Areas (MPAs) within England's inshore waters (out to 12 nautical miles) to support sites in achieving conservation objectives and to guide effective management.

1.3 The ESW Plan Context

The ESW area is split into two geographically separate supply areas known as the Essex Supply Area and the Suffolk Supply Area (Figure 1). We supply water to around 1.5 million customers in the Essex Supply Area and around 300,000 customers in the Suffolk Supply Area.

There are four Water Resources Zones (WRZ) covering both Essex and Suffolk Supply Areas. The Essex Supply Area consists of a single WRZ whilst the Suffolk Supply Area comprises three WRZs known as the Hartismere, Blyth and Northern Central WRZs. For more information on the WRZ see Essex and Suffolk Water (2026)[3].

[1] Department for Levelling Up, Housing and Communities (2024) National Planning Policy Framework. Available from: National Planning Policy Framework - GOV.UK (www.gov.uk) (Accessed February 2026)
[2] Defined by the Convention on Wetlands of International Importance, especially as waterfowl habitat (otherwise known as the 'Ramsar Convention). https://www.ramsar.org/
[3] Essex & Suffolk Water (ESW) (2026). ESW Drought Plan 2027 Strategic Environmental Assessment (SEA) Environment Report. WN025_0000-JAC-ZZ-ZZ_000-DOC-TV-0010.

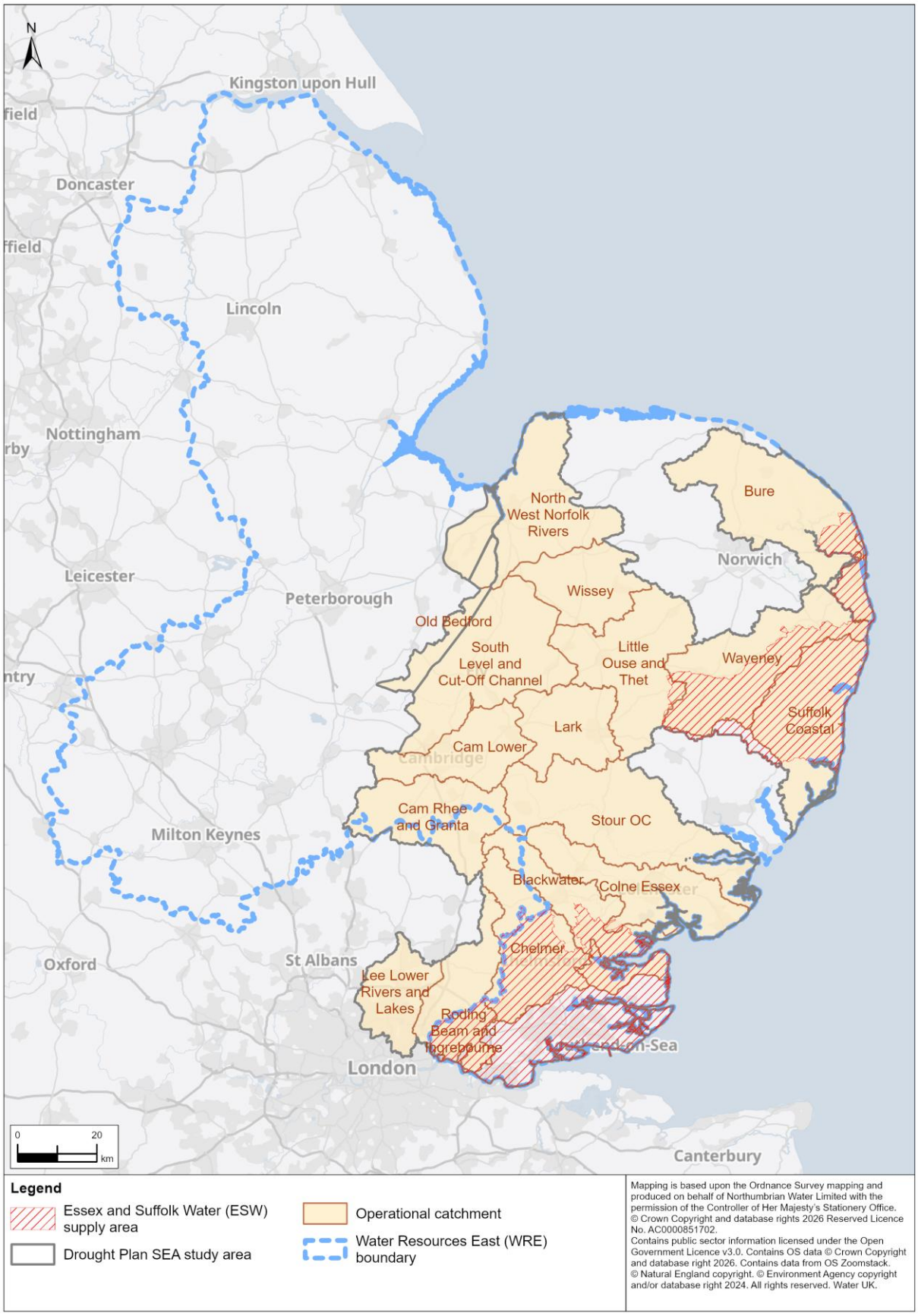

Figure 1: Essex and Suffolk Water Supply Areas

2 DROUGHT PLAN DEVELOPMENT

2.1 Approach

The assessment of drought actions, both the demand and supply-side, follows a structured two-stage approach designed to ensure that all potential actions are rigorously assessed for feasibility, effectiveness, and strategic alignment before inclusion in the Drought Plan.

The first stage involves compiling a comprehensive, unconstrained list of potential drought actions. We have undertaken a broad screening exercise to identify all viable actions, regardless of current operational status or delivery constraints. Each action was assessed against a set of criteria to determine whether it should progress to detailed planning.

Drought actions that pass the initial screening were developed into a constrained list of implementable actions. This second stage ensures that each selected action is operationally ready, strategically aligned, and responsive to drought severity. Actions were categorised by intervention type (demand-side or supply-side) and aligned with drought severity levels (Level1, Level 2, Level 3a, and Level 3b).These are summarised in Table 1. Level 0 - Business as usual (BAU) dry weather actions are also included. Level 4 falls under the Emergency Plan and is therefore excluded from this table.

This approach supports transparent decision-making and ensures that resources are focused on actions capable of delivering timely and measurable benefits during drought conditions. Full details of the process used to develop drought actions can be found in Section 2.4 of the ESW SEA Report[4].

[4] Essex & Suffolk Water (ESW) (2025). ESW Drought Plan 2027 Strategic Environmental Assessment (SEA) Environment Report.

Table 1: Drought Plan demand and supply-side actions

Severity of drought	Level	Demand-side actions	Supply-side actions
	Level 0 (BAU)	**Network optimisation** **Customer communications** **As per our WRMP24 demand management selected options**: ▪ Leakage detection and repair suite of options ▪ Water efficiency activity (non-household and household) ▪ Compulsory smart metering ▪ Government-led Interventions	**All WRZs**: • Raw water and water treatment works optimisation. • Coordination planning to minimise planned outage. **Essex WRZ:** • Operation of the Environment Agency's (EA) Ely Ouse to Essex Transfer Scheme (EOETS) • Langford Recycling Plant operation to support River Chelmer flows for abstraction at Langford WTW. **Northern Central WRZ:** • Operation of the EA's Waveney Augmentation Groundwater Scheme (WAGS)
	Level 1	**Appeal for Restraint**: ▪ Enhanced dry weather messaging ▪ Additional resource for leakage teams (overtime, redeploy internal teams) ▪ Encourage reporting of leaks ▪ Stop proactive flushing ▪ Optimising water supply and network ▪ High water use alerts to customers ▪ Water saving calculator promotion ▪ Reduce all customer pressures to 15m head at the critical point in each pressure managed area	**Essex WRZ:** • Operation of the EA River Flow Augmentation Schemes: ○ Stour Augmentation Groundwater Scheme (SAGS) ○ Great Ouse Groundwater Scheme (GOGS) **Hartismere WRZ:** • Road tankering potable water from Carlton Colville Pumping Station to Bedingfield and Eye.
	Level 2	**Temporary Use Bans (TUBs):** ▪ Additional resource to find leaks (contractors) ▪ Repair all outstanding customer-side leaks ▪ Challenge illegal use ▪ Water efficiency home audits to targeted areas ▪ Education workshops - community and schools ▪ Community outreach & business funding ▪ Tourism support	**Essex WRZ:** • Denver Drought Order to apply to temporarily reduce Hands off Flow on the EA's Denver Licence for the period of 1st March to the 30th April.
	Level 3a	**Non-Essential Use Bans (NEUBs):** ▪ Minimise minimum flows at WTW ▪ Hard hitting communications ▪ Reduce pressures to 10m ▪ Installation of flow regulators to households ▪ Shower device offering ▪ Flow restrictors to non-households	**Essex WRZ:** • Bulk raw water transfer from Thames Water to Chigwell WTW – fair apportionment of water clause enacted when both companies implement a TUB. This will **reduce** the volume of water transferred compared to normal operation.
	Level 3b	**Reduce Ships Watering** **Removal of Statutory Exceptions on TUBs and NEUBs** **Manage SOP storage to low-low alarm levels** **Seasonal Tariffs for smart metered customers** **Reduce all pressures to 10m**	**Blyth WRZ**: • Coldfair Green groundwater abstraction licence drought permit to increase groundwater abstraction and/or reduce compensation flow.

3 APPROACH TO HRA

3.1 Objective

The objective of the HRA is to establish whether measures included in the ESW Drought Plan 2027 are likely to have a significant effect on European sites (alone or in-combination with other supply schemes in the plan, or with other plans and projects), and where likely significant effects cannot be ruled out, adopting the precautionary principle, to determine through Appropriate Assessment whether the option would adversely affect the integrity of the European site(s).

The HRA has been undertaken in parallel with the Strategic Environmental Assessment (SEA) and Water Framework Directive (WFD) assessment to ensure an integrated approach to environmental assessment and has been used to inform the development of our Drought Plan 2027 to ensure its overall compliance with relevant legislation.

3.2 Overview of the HRA Stages

An overview of the HRA process is outlined below:

- Stage 1 – Screening;
- Stage 2 – Appropriate Assessment;
- Stage 3 – Derogation
  - Assessment of Alternative Solutions;
  - Imperative Reasons for Over-riding Public Interest (IROPI) and
  - Compensation.

A number of European Sites fall within our Drought Plan area, hereafter referred to as the 'Plan Area'. Under the Habitats Regulations, Competent Authorities, i.e. any minister, government department, statutory undertaker, public body, or person holding public office, have a general duty, in the exercise of any of their functions to have regard to the Habitats Regulations. Furthermore, according to UK Water Industry Research (UKWIR) 2021 Guidance[5], a water company is the Competent Authority with respect to HRA.

The Water Company Drought Plan Guideline 2025[6] (for England and Wales) indicates that water companies must demonstrate in their drought plans that they have met their responsibility to monitor, assess and where possible mitigate for the environmental impact of all supply-side drought actions. Environmental assessments for supply-side drought actions should also include any mitigation measures planned to be implemented. Water

[5] UK Water Industry Research (2021) Environmental Assessment Guidance for Water Resources Management Plans and Drought Plans (21/WR/02/15). Available at: Environmental Assessments for Water Resources Planning
[6] Water company drought plan guideline, June 2025, Environment Agency, Defra. Available online: https://www.gov.uk/government/publications/water-company-drought-plan-guideline-2025/water-company-drought-plan-guideline-2025

companies must ensure that their environmental assessments meet all the expectations set out in the relevant environmental legislation, including the Habitats Regulations.

The purpose of screening (i.e. this report documenting Stage 1 of the HRA process) is to identify whether activities associated with plans or projects, not directly connected with or necessary to the management of a European Site, either acting individually or in-combination with other plans or projects, could result in Likely Significant Effects (LSEs) on any European Sites. All potential effects between activities associated with the plans or projects and the ecological components of European Sites must be considered. At Stage 1 – Screening, the burden of evidence is to show, on the basis of objective information, and beyond reasonable scientific doubt, that the proposed plan or project will have no LSEs on a European Site. If the effect is likely to be significant, or is not known, it would trigger the need for Stage 2 Appropriate Assessment (AA).

In the context of Stage 1, when applying the "test of significance", the test is of the "likelihood" of effects rather than the "certainty" of effects. In accordance with the Waddenzee Judgement (Case C-127/02)[7], a likely effect is one that cannot be ruled out based on objective information and is underpinned by the precautionary principle and the test of beyond reasonable scientific doubt. This test therefore sets a low bar: a project or plan should be considered "likely" to have an effect if ESW is unable (on the basis of objective information) to exclude the possibility that the project or plan could have significant effects on any European Site, either alone or in-combination with other plans or projects. An effect is considered to be 'significant' if it could undermine a European Site's conservation objectives.

If the Stage 1 Screening has determined that Stage 2 AA is required, the Competent Authority then considers the effects of the project or plan on the integrity of the European Site(s), specifically it must be determined if the project or plan will adversely affect the integrity of a European Site(s) either individually or in-combination with other plans and projects in view of the site conservation objectives. The qualifying interests of the European sites have been considered with reference to Standard Data forms for SACs and SPAs and Information Sheets for Ramsar sites. This information has been used to identify those features of each site which determine current conservation status of the site. Where potential adverse effects on site integrity (AESI) are identified, mitigation measures are proposed to avoid adverse effects, as appropriate (as required under the provisions of Article 6(3)).

Following Stage 2 AA, if AESI remain following the application of mitigation, or uncertainty remains and the project/plan is to be progressed, an Assessment of Alternative Solutions (i.e. Stage 3 of the HRA process) is required under the provisions of Article 6(4) of the Habitats Directive. This process examines the alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European Site. If no alternatives exist, or all alternatives would result in adverse effects on the integrity of a

[7] Case C-127/02. Judgment of the Court (Grand Chamber) of 7 September 2004. Landelijke Vereniging tot Behoud van de Waddenzee and Nederlandse Vereniging tot Bescherming van Vogels v Staatssecretaris van Landbouw, Natuurbeheer en Visserij. Reference for a preliminary ruling: Raad van State - Netherlands. Directive 92/43/EEC -Conservation of natural habitats and of wild flora and fauna - Concept of "plan' or "project' - Assessment of the implications of certain plans or projects for the protected site.

European Site, then either the process moves to the next stage (Imperative Reasons of Over-riding Public Interest (IROPI)) or the project or plan should be abandoned.

In the case where the provisions of Article 6(3) cannot be met (i.e. that a project or plan will not result in AESI, either alone or in-combination with other projects or plans, on any European Site), the provisions of Article 6(4) are used (i.e. Stage 4 – IROPI). If, in the light of an assessment of IROPI, it is deemed that the project or plan should proceed, there will then be a resultant requirement for compensatory measures to be implemented to maintain the coherence of the European Site network in the face of adverse effects to the integrity of the site(s).

3.3 Application of the Habitats Regulations Assessment Process at Plan Level versus Project Level

The methodology for undertaking Stage 1 Screening can be applied at both project and plan level. The suitability of the data and information used and any decisions flowing from its use in the assessment of any project or plan have to meet the provisions and requirements of the Habitats Regulations. The strategic assessments at the plan-level will inevitably be undertaken at a higher level than would be the case for projects.

Importantly, the key distinction between plan and project level HRA relates to the:

- Geographic specificity (that is, from generally described regions at the plan-level to a defined and fixed location/route at the project level); and
- Duration and timing of impacts (usually not known at plan-level).

Each individual drought action would be considered a separate ‘project’, with the HRA Plan assessment an assessment of the overriding plan promoting these projects.

Therefore, the scale and nature of the assessment is based on the best available information at either project or plan-level, whilst meeting the provisions and requirements of the Habitats Regulations.

Guidance from the European Commission (EC) (EC 2021a)[8] and the judgment of the European Court of Justice in the case of EC v the UK, (Case C – 6/04)[9] are helpful in understanding how plans could have a significant effect on a European Site. Based on this guidance, a plan may affect a European Site by:

- Proposing or resulting in particular types of change that are inherently damaging;
- Proposing or resulting in a magnitude of change that would be damaging because it would be so large;
- Proposing or resulting in a magnitude of change that in the proposed location would be damaging;

[8] European Commission, 2021. Guidance Document. The strict protection of Community interest under the Habitats Directive.

[9] Case C-6/04 Commission v United Kingdom of Great Britain and Northern Ireland.

- Resulting in cumulative or combined effects that would be damaging, either from a programme of similar or different proposals within the plan itself, or a combination of such proposals in a plan and in other plans or projects;
- Blocking options for future plans and proposals;
- Providing the justification for damaging change; and
- Failing to foresee damaging effects that would occur later in a programme.

In the case of the Drought Plan, the strategic assessment does not provide consent for any future activities arising from it or any future iterations of the plan itself, but undertaking the HRA process with respect to it demonstrates that the protection of the European Site network is suitably considered and achievable in the context of the remit of the plan.

Furthermore, should Stage 1 and/or Stage 2 of the HRA process be undertaken for any future activities defined by, or which are of relevance to the Drought Plan, project level HRA screening exercises will have regard to the HRA process undertaken for the Drought Plan as a whole.

4 STAGE 1 SCREENING

4.1 Introduction

The purpose of this section is to assess or 'screen' the Drought Plan to identify elements of it for which LSEs on a European Site can or cannot be ruled out.

Stage 1 screening has been informed by a desk study of all relevant environmental information and involved the following steps, which align to UKWIR 2021 guidance[10]:

- Determination if the proposed plan (i.e. the Drought Plan) is directly connected with or necessary to the management of a European Site (Section 4.2);
- Identification of European Site(s) in the hydrological Zone of Influence (ZoI) for each drought action (Section 4.3) (where applicable);
- Assessment of the separate elements of the Drought Plan for potential to affect European Sites (Section 4.4);
- Assessment of Likely Significant Effects (LSEs) on European Site(s) (Section 4.5);
- Assessment of the Drought Plan alone (Section 4.6);
- Assessment of the Drought Plan in-combination (Section 5); and
- Determination on the need for Appropriate Assessment (Section 6).

4.2 Is the Drought Plan Exempt from HRA?

HRA is required for all plans and projects that are not connected with the management of European Sites. The overarching objective of the Drought Plan is not related to the nature conservation management of the European Sites, but to provide a supply of potable drinking water during periods of low summer riverine flows and low groundwater levels and during their recovery. Therefore, the Drought Plan is not considered to be connected with or necessary to the management of European Sites. As such, it is necessary to proceed with Stage 1 Screening of the Drought Plan.

4.3 Identification of European Sites

European Sites are designated for a range of features including, but not limited to, terrestrial and aquatic habitats, groundwater dependent terrestrial ecosystems (GWDTEs), highly mobile species, species with limited mobility or species with strict habitat requirements. Initial consideration identified all European sites that lie within 10km of a proposed drought action. This broad scale approach was then refined to identify those sites that could be connected to the proposed drought action, either through an existing hydrological pathway (surface water or groundwater), mobile qualifying interest species or

[10] UK Water Industry Research (2021) Environmental Assessment Guidance for Water Resources Management Plans and Drought Plans (21/WR/02/15). Available at: Environmental Assessments for Water Resources Planning

sensitive habitat. Where Environmental Assessment reports (EARs – see below) have been produced for a drought action, the hydrological zone of influence was used to determine the potential interaction with European Sites and qualifying interests. Where hydrological zones of influence have not been assessed then the precautionary principle was applied in determining the potential pathways to effect between drought action and European Site. GIS data were used to map the locations and boundaries of European Sites within or adjacent to our Water Resource Zones (WRZs) using publicly available data from Natural England. Any European Site with a conceivable link to the operation of the drought action was screened into Stage 1.

The attributes of the European Sites, which contribute to and define their integrity, have been considered with reference to Standard Data forms for SACs and SPAs and Information Sheets for Ramsar sites. An analysis of these information sources has enabled the identification of the sites' qualifying features. This information, as well as Article 12 and 17 reporting, site conservation objectives, supplementary guidance, Site Improvement Plans, and the supporting Site of Special Scientific Interest's favourable condition tables, has been used to identify those features of each site which determine current conservation status, site integrity and the specific sensitivities of the site. Analysis of how potential impacts of our drought actions may affect a European Site has been undertaken using this information. The locations of our supply-side actions were also mapped in order to establish their geographic proximity to the European Sites.

4.4 Elements of the Plan with Potential to Lead to LSE

The text of the Drought Plan was assessed to determine if any aspect could affect a European Site. Within a typical plan, much of the text often introduces the plan area, provides background on current conditions and challenges and presents next steps for implementing the proposed plan. This type of text can often be screened out as it cannot conceivably have an impact on European Sites (Tyldesley and Chapman 2013)[11].

The remaining sections of a proposed plan often contain the aims and objectives, and it is considered possible that these could have the potential to impact European Sites. The elements of the Drought Plan with the potential to lead to LSE are the drought actions themselves. Several environmental assessments are included in the Drought Plan including EARs and strategic assessments (SEA, HRA and WFD) to help assess the risk of contributing towards LSE.

Our Drought Plan 2027 proposes a number of drought actions which would make more water available for supply than is available under normal licensed conditions. Drought actions include demand-side actions (e.g. water use restrictions), continued utilisation of existing licensed water sources within ESW's resource base and drought permits/orders to allow access to additional water resources (referred to as supply-side actions).

[11] Tyldesley, D., and Chapman, C., 2013. The Habitats Regulations Assessment Handbook: DTA Publications Limited.

Demand-side drought actions are designed to reduce the demand for water and the actions available to ESW are consistent across all resource zones (see Table 1). These actions seek to reduce demand from public and business consumption during drought periods. Demand-side drought actions are all focused on reducing customer usage, specifically within the potable water network. As such, demand-side drought actions may reduce the need for abstraction from the natural environment, and will not result in a likely significant effect on European Sites, and their qualifying habitats and species. Therefore, no demand-side actions are taken forward for further assessment of LSE and the remainder of this section will focus on supply-side drought actions only

Supply-side drought actions are actions introduced during the course of a drought to increase the amount of water available for supply. Our supply-side drought actions are listed in Table 2.

Table 2: Supply-side drought actions within the Drought Plan 2027

Level	Drought Action	Detail	Further HRA assessment required
Level 0	Raw water and WTWs optimisation	Maximise early abstraction from rivers to maintain reservoir and groundwater storage, preserving availability for later drought stages when river flows are low	No - as Level 0 actions all operated within existing permits/consents and no pathway to effect to European sites
	Coordination planning to minimise planned outage	Defer planned maintenance during drought or bring forward works early if they improve water resource availability.	No –as Level 0 actions all operated within existing permits/consents and no pathway to effect to European sites
	Ely Ouse to Essex Transfer Scheme (EOETS)	Operation of the Environment Agency scheme that transfers water from fenland rivers to the River Stour and River Pant via tunnels and pipelines, supporting refill of Abberton and Hanningfield reservoirs. Activation is based on agreed control curves.	Yes – in-combination only as this action relates to a third party owned and operated existing water transfer scheme that will have been independently assessed when licensed
	Langford Recycling Plant	Indirect potable reuse at Langford WTW, returning treated effluent to the River Chelmer under licence to support abstraction and reservoir refill (up to ~30–40Ml/d).	Yes – in-combination only as this action relates to the operation of an existing scheme that will have been independently assessed when licensed
	Waveney Augmentation Groundwater Scheme (WAGS)	An Environment Agency operated scheme that supports River Waveney flows during drought by pumping groundwater when river levels fall below licence thresholds, ensuring abstraction needs are met.	Yes – in-combination only as this action relates to a third party owned and operated existing augmentation scheme that will have been independently assessed when licensed
Level 1	Stour Augmentation Groundwater Scheme (SAGS)	An Environment Agency operated scheme that pumps groundwater into the River Stour during drought to maintain flows and support downstream abstractions for reservoir refill.	Yes – in-combination only as this action relates to a third party owned and operated existing augmentation scheme that will have been independently assessed when licensed
	Great Ouse Groundwater Scheme (GOGS)	Uses EA groundwater boreholes to augment River Great Ouse flows during drought, supporting EOETS and improving supply resilience.	Yes – in-combination only as this action relates to a third party owned and operated existing augmentation scheme that will have been independently assessed when licensed
	Hartismere	Transport water via roads from Carlton Colville Pumping Station to Hartismere towers (Bedingfield and Eye) to maintain tower levels during drought; limited volumes mean it supplements storage rather than replacing lost WTW output.	Yes – acknowledging very limited quantities transferred

Level	Drought Action	Detail	Further HRA assessment required
Level 2	Denver	Apply to reduce the HoF in March & April (318,226 m^3/day) to the summer HoF (113,652 m^3/day). This will allow access to more water when water quality is good.	Yes – alone and in-combination as a new drought action with the potential to modify downstream water availability to downstream protected sites.
Level 3a	Bulk raw water transfer from Thames Water to Chigwell WTW	Bulk raw water transfer from Thames Water to Chigwell WTW – fair apportionment of water clause enacted when both companies implement a TUB. Note that this could **reduce** the volume of raw water transferred compared to normal operation.	Yes – in-combination only as this action relates to a third party owned and operated existing water transfer scheme that will have been independently assessed when licensed
Level 3b	Coldfair Green	Increase in abstraction from 2,730m^3/day to 3,000 m^3/day as step one with a 50% decrease in compensation flow (currently 205m^3/day) as step two as needed. Step three involves ceasing compensation discharge entirely and utilising that volume for PWS. Approx 10% increase in public supply through an increase in abstraction at step one plus additional water made available for PWS via decrease in, and cessation of, compensation flow to Hundred River in steps two and three, respectively.	Yes – alone and in-combination as a new drought action with the potential to modify downstream water availability to downstream protected sites.

Two Level 0 actions in Table 2:

- Raw water and WTWs optimisation
- Coordination planning to minimise planned outage

Have been assessed as not requiring further consideration within the HRA as they are both operational optimisation actions operated within existing permits and consents and with no pathway to effect to European sites.

A number of our supply-side actions listed in Table 2 are existing water supply schemes operated by other parties which have already undergone environmental assessment as part of their permitting. As such these supply-side actions have been excluded from the Screening. All of these supply-side actions, that would be operational during different drought levels will be considered within the in-combination assessment of the Stage 1 Screening. This applies to the following drought actions:

- Ely Ouse to Essex Transfer Scheme (EOETS);
- Langford Recycling Plant;
- Waveney Augmentation Groundwater Scheme (WAGS);
- Stour Augmentation Groundwater Scheme (SAGS);
- Great Ouse Groundwater Scheme (GOGS); and
- Bulk raw water transfer from Thames Water to Chigwell WTW.

Of the supply-side actions listed in Table 2, tankering to Hartismere, the modification to the Hands off Flow (HoF) at Denver and the increase in abstraction / decrease in compensation flow at Coldfair Green are not business as usual or already licensed. These three drought actions are the principal focus of this HRA.

4.5 Assessment of Likely Significant Effect on European Sites

4.5.1 Source Pathway Receptors

In determining the likelihood of significant effects on European Sites from any drought action, particular consideration has been given to the possible source-receptor pathways through which effects may be transmitted from activities associated with the drought actions, to features contributing to the integrity of the European Sites (e.g. groundwater or surface water catchments, air, etc.). Table 3 identifies impact pathways the drought actions could conceivably have on European Site qualifying features. Screening for LSEs has been determined on a proximity basis for many of the types of impacts, based on the known location of each drought action relative to each European Site and the hydrological connectivity between effect and European Site.

All of the drought actions included in the Drought Plan 2027 are changes to current operations and require no construction. As such only operational effects are considered in this assessment.

Table 3: Potential impact of drought actions

Impact pathways	Examples of operations responsible for impacts
Habitat loss or fragmentation	Reduction in downstream flows resulting from changes in abstraction rates or compensation releases may reduce the wetted area of the channel, lead to localised drying of the river and/or increase the fragmentation of habitats, for example through decreasing the passability of in-channel structures to migratory fish. These effects are only likely to be significant where the operation of the drought action extends within the same ground or surface water catchment as the European Site. However, these effects are dependent on hydrological continuity between the drought action and the European Site, and whether the drought action is up- or downstream from the European Site, and the presence of water dependent habitats and species.
Disturbance	Operation of drought actions have the potential to result in increased activity at water abstraction and reservoir sites. Mobile qualifying interest species may be affected through increased visual and noise disturbance. This effect is only likely to be significant where activities related to the drought action are undertaken within a European Site and in the presence of mobile qualifying interest species.
Changes in water quality (toxic/non toxic)	Reduction in downstream flows resulting from changes in abstraction rates or compensation releases may reduce the dilution effects of riverine base flow. Changes to physiochemical quality of riverine flow may include changes in thermal regime, nutrient level and turbidity. These effects are only likely to be significant where the operation of the drought action extends within the same ground or surface water catchment as the European Site. However, these effects are dependent on hydrological continuity between the drought action and the European Site, and whether the drought action is up or down stream from the European Site.
Changes in water quantity	An increase in abstraction (or reduction in compensation flow) can modify the water volume and flow variation downstream. Changes to water quantity have the potential to alter aquatic habitat and species distribution, affect geomorphological process, in-channel hydraulics and result in changes to the ability of the watercourse to support species of conservation interest. These effects are only likely to be significant where the operation of the drought action extends within the same ground or surface water catchment as the European Site. However, these effects are dependent on hydrological continuity between the drought action and the European Site, and whether the drought action is up or downstream from the European Site.
Changes in hydrogeology	Changes in abstraction of groundwater sources has the potential to affect surface water flows in groundwater catchments that have close connectivity to fluvial catchments. An increase in groundwater abstraction may reduce the water quantity (see above) available to the fluvial environment. These effects are only likely to be significant where the operation of the drought action extends within the same ground or surface water catchment as the European Site. However, these effects are dependent on hydrological continuity between the drought action and the European Site, and the scale of the change in groundwater abstraction.
Invasive non-native species (INNS)	A reduction in flow as a result of abstraction or change to compensation flow may provide an opportunity for INNS to establish in previously wetted watercourse margins or areas of slower flowing water. These effects are only likely to be significant where the operation of the drought action extends within the same ground or surface water catchment as the European Site.

4.5.2 Environmental Assessment of Drought Plan 2027

For our Drought Plan 2027, environmental assessments have been undertaken for those actions requiring a drought order/permit, culminating in the production of Environmental Assessment Reports (EAR) as described below. As a result EARs have been produced for the modification to the Hands-off Flow at Denver and the increase in abstraction and decrease in compensation flow at Coldfair Green. Environmental assessment for all other drought actions is included in our SEA[12].

The outcomes of these assessments have informed the final version of this HRA. Our EARs provide the technical evidence base for the environmental baseline and hydrological modelling available at the time of writing. A Regulation 63 test of likely significant effect has then been independently applied as part of this assessment. While our EAR documents may be reviewed and updated periodically in line with the EA supplementary guidance, the conclusions of our HRA are based on the current, agreed versions of those assessments.

Our EARs have been carried out according to guidance in the UKWIR (2021)[13] and Environment Agency (2025)[14]. This assessment includes the following stages:

- an assessment of the likely changes in flow/level regime due to implementing the drought action;
- identification of the environmental features that are sensitive to these changes and an assessment of the likely impacts on these features;
- identification of mitigation that may be required to prevent or reduce impacts on sensitive features; and
- recommendations for baseline, in-drought and post-drought drought action monitoring requirements.

The initial stage of each EAR determines the zone and extent of hydrological influence of each drought action both on an individual basis and taking into account cumulative effects of simultaneous action deployment, where actions were located within the same catchment, and across catchments. All European Sites that interact with the hydrological ZoI (shown in Figure 2 and Figure 3) are assessed at Stage 1 Screening. The assessment considered the cumulative effects of other discharges and abstractions using abstraction licence and discharge consent information supplied by the Environment Agency.

A sensitivity assessment was used alongside GIS to identify sites and features which could be impacted by drought action implementation. These include European Sites (SAC, SPA and Ramsar). The assessment considered the susceptibility of each site/feature to hydrological impacts (flow/level changes) in order to evaluate the sensitivity of each

[12] Essex & Suffolk Water (ESW) (2026). ESW Drought Plan 2027 Strategic Environmental Assessment (SEA) Environment Report. WN025_0000-JAC-ZZ-ZZ_000-DOC-TV-0010.
[13] UK Water Industry Research (2021). Environmental Assessment Guidance for Water Resources Management Plan and Drought Plans. Report Ref. No2.1/WR/02/15 ISBN:978-1-84057-913-0
[14] Environment Agency. 2025. Environmental assessment for water company drought planning supplementary guidance. Available online: https://www.gov.uk/government/publications/water-company-drought-plan-guideline-2025/water-company-drought-plan-guideline-2025#environmental-assessment-monitoring-and-mitigation

site/feature, and whether it was taken forward for further consideration in the environmental assessment. Consideration of susceptibility in the case of SACs, SPAs and Ramsars identifies qualifying interests and whether, or to what extent, they are water dependent, and likely to be impacted by a drought action's implementation. This consideration was cognisant of the appropriate baseline conditions against which an impact would be likely to arise (often severe drought conditions).

4.5.3 Consideration of In-combination Effects

The hydrological impact assessment described above and documented in the EARs considered hydrological impacts of simultaneous deployment of actions within the same catchments, and across different catchments. Cumulative impacts that could arise with other non-public water supply abstractions were also considered, as were indirect impacts on water quality as a result of reduced dilution.

In accordance with the Habitats Regulations, the assessment has therefore considered the in-combination effects of the drought actions in our Drought Plan with other plans and projects that could have an impact on the European Sites identified within this HRA. The following plans and projects have been considered in the in-combination effects assessment:

- Inter-option effects within our Drought Plan.
- Other water company WRMPs and Drought Plans, such as the WRMP for ESW; and the Environment Agency National Drought Action Plan.

Figure 2: Interaction between Denver drought action and European Sites.

Figure 3: Interaction between Coldfair Green drought action and European Sites.

4.6 Stage 1 Screening Results

Level 1 to 3b supply-side options, that have not been previously assessed under separate permits or licences, were screened into the Stage 1 Screening.

Excluded from the screening are supply-side Level 1 (BAU) drought actions as listed in Table 1 and all supply-side actions operating within existing permits and / or licences, which are assessed within the in-combination assessment. The HRA screening matrix for this assessment is presented in Table 4. Drought actions owned and operated by the Environment Agency will have undergone HRA as part of their licensing process, and result in no likely significant effect during operation. The potential for in-combination effect of previously licensed drought options alongside new drought actions within our Drought Plan 2027 were assessed and are documented in the in-combination assessment.

Table 4 demonstrates that all actions within our Drought Plan 2027 do not result in LSEs on the qualifying interests of European Sites that have potential pathways to effect.

Table 4: Screening of supply-side drought actions for impacts on European Sites.

Drought actions	European Site (within hydrological ZoI)	Qualifying Interests	Pathway to effect	Potential for effects on Qualifying Interests	Potential Likely Significant Effect (alone)	Potential Likely Significant Effect (in-combination)
Hartismere tankering	n/a	n/a	No - tankers are filled with potable water directly from distribution network before travelling via road to different network node where water is returned to network. At no stage does this interact with any European Sites.	None	None	None
Coldfair Green	Sandlings SPA UK9020286 (2.05km)	Nightjar, woodlark	Yes - hydrological connection. Medium magnitude changes to river depth, velocity and wetted perimeter of the Hundred River (5.2.2 of Coldfair Green EAR[15])	None - qualifying interests are not functionally dependent on riverine or groundwater habitats.	None	None
	Outer Thames Estuary SPA UK9020309 (3.9km)	Red throated diver Common tern Little tern	No. Hydrological connection but beyond the hydrological ZoI.	None - Change in freshwater discharge into North Sea considered ecologically inconsequential to qualifying interests	None	None
	Southern North Sea SAC UK0030395 (3.9km)	Harbour porpoise	Yes - hydrological connection but beyond the hydrological ZoI.	None - Change in freshwater discharge into North Sea considered	None	None

[15] Essex and Suffolk Water (2026) Coldfair Green Environmental Assessment Report (EAR). [Unpublished]. Available on request.

Drought actions	European Site (within hydrological ZoI)	Qualifying Interests	Pathway to effect	Potential for effects on Qualifying Interests	Potential Likely Significant Effect (alone)	Potential Likely Significant Effect (in-combination)
				ecologically inconsequential to qualifying interests		
Denver	Ouse Washes SPA UK9008041 (2.9km)	Ruff, Bewick swan, whooper swan, hen harrier, gadwall, mallard, garganey, shoveler, black tailed godwit, cormorant, mute swan, wigeon, teal, pintail, pochard, tufted duck, coot, oystercatcher, redshank, snipe, lapwing, black tailed godwit.	No - Modification of HoF will not affect water availability to the Ouse Washes. Water level in Ouse Washes is controlled at Salters Lode and not reliant on flows from Denver.	None	None	None
	Ouse Washes SAC UK0013011 (670m)	Spined loach	No - Modification of HoF will not affect water availability to the Ouse Washes. Water level in Ouse Washes is controlled at Salters Lode and not reliant on flows from Denver.	None	None	None
	Ouse Washes Ramsar UK11051 (670m)	Ramsar criterion 1: one of the most extensive areas of seasonally-flooding washland of its type in Britain. Ramsar criterion 2: several nationally scarce plants, Site holds relict fenland fauna, including large darter dragonfly and rifle beetle. The site also supports a diverse assemblage of nationally rare breeding waterfowl associated with seasonally-flooding wet grassland. Ramsar criterion 5: Assemblages of international importance: Ramsar	No - Modification of HoF will not affect water availability to the Ouse Washes. Water level in Ouse Washes controlled at Salters Lode and not reliant on flows from Denver.	None	None	None

Drought actions	European Site (within hydrological ZoI)	Qualifying Interests	Pathway to effect	Potential for effects on Qualifying Interests	Potential Likely Significant Effect (alone)	Potential Likely Significant Effect (in-combination)
		criterion 6: species/ populations occurring at levels of international importance- Bewick sawn, whooper swan, wigeon, gadwall, teal, pintail, shoveler.				
	The Wash and North Norfolk Coast SAC UK0017075 (25km)	Sandbanks which are slightly covered by sea water all the time. Mudflats and sandflats not covered by seawater at low tide. Large shallow inlets and bays. Reefs. Salicornia and other annuals colonising mud and sand. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*) Coastal lagoons. Harbour seal	Yes - Hydrological connection but negligible change predicted in water level (<0.06%), velocities *<0.06%) and discharge volumes in the tidal Great Ouse. No discernible change to freshwater inflow into the Wash and Norfolk Coast SAC (Denver EAR[16] sections 4.2, 5.3.2).	None	None	None
	The Wash SPA UK9008021 (25km)	Bar-tailed godwit, Bewick's swan, black-tailed godwit, common scoter, curlew, dark-bellied brent goose, dunlin, gadwall, goldeneye, grey plover; knot, oystercatcher, pink-footed goose, pintail, redshank, sanderling, shelduck, turnstone, wigeon, common tern and little tern.	Yes - Hydrological connection but negligible change in water quality and sediment dynamics. No discernible change to freshwater inflow into the Wash SPA (Denver EAR[17] sections 4.1, 4.3, 4.4 and 5.3.1).	None	None	None

[16] Essex & Suffolk Water (2026) Denver Environmental Assessment Report (EAR). [Unpublished]. Available on request.
[17] Essex & Suffolk Water (2026) Denver Environmental Assessment Report (EAR). [Unpublished]. Available on request.

Drought actions	European Site (within hydrological ZoI)	Qualifying Interests	Pathway to effect	Potential for effects on Qualifying Interests	Potential Likely Significant Effect (alone)	Potential Likely Significant Effect (in-combination)
	The Wash Ramsar UK11072 (25km)	Ramsar criterion 1: extensive saltmarshes, major intertidal banks of sand and mud, shallow water and deep channels. Ramsar criterion 3: inter-relationship between its various components including saltmarshes, intertidal sand and mud flats and the estuarine waters. Ramsar criterion 5: Assemblages of international importance: Species with peak counts in winter: 292541 waterfowl (5 year peak mean 1998/99-2002/2003) Ramsar criterion 6: species /populations occurring at levels of international importance: oystercatcher, grey plover, red knot, sanderling, curlew, redshank, ruddy turnstone, pink footed goose, dark bellied brent goose, shelduck, pintail, dunlin, bar tailed godwit.	Yes - Hydrological connection but negligible change in water quality and sediment dynamics. No discernible change to freshwater inflow into the Wash Ramsar (Denver EAR[18] sections 4.1, 4.3, 4.4 and 5.3.1).	None	None	None

[18] Essex & Suffolk Water (2026) Denver Environmental Assessment Report (EAR). [Unpublished]. Available on request.

5 POTENTIAL IN-COMBINATION EFFECTS OF DROUGHT ACTIONS

Our drought actions, tankering from Hartismere, increasing abstraction at Coldfair Green and reducing the Hands-off Flow at Denver are assessed as not having a Likely Significant Effect on qualifying interests of European Sites. However, drought actions could be used at a similar time, should they be required, and therefore an assessment has been completed to determine the potential for LSEs, as detailed in Table 5. Drought actions at Coldfair Green and Denver are geographically isolated so there is no opportunity for in-combination effects on European Sites between these drought actions.

Furthermore, no significant in-combination effects have been identified between any of the demand-side and supply-side actions, as drought actions would be introduced progressively and sequentially, starting with those that would have the least impact on customers and the environment.

We have undertaken an in-combination effects assessment (Table 5) to identify the potential cumulative effects of the actions within our Drought Plan along with the following plans and projects:

- Other water company Drought Plans
- WRMPs
  - Our WRMP24
  - Other water companies' WRMPs
- Other plans and projects
  - Water Resource East Plan
  - Anglian RBMP
  - Nationally Significant Infrastructure Projects (NSIPs)
  - Strategic Resource Options

Table 5: In-combination assessment of drought plan and other strategic plans.

Plan or Project	Summary	Potential for in-combination effect
Other Company Drought Plans	Water company Drought Plans set out the range of demand management and supply augmentation measures that may need to be implemented during drought conditions to maintain essential water supplies to customers. It should be noted that the assessment of in-combination effects from other water companies' Drought Plans are limited by the information available at this stage. This assessment will need to be updated once the draft Drought Plans from other companies become available for review.	
Anglian Water	EOETS is proposed by both water companies as an option during drought conditions. For Anglian Water, EOETS is categorised as a Level 3 drought action, whereas it is considered a Level 0 drought action within our Drought Plan. Limited information regarding this action is available from Anglian Water regarding operations under extreme drought conditions.	Limited information regarding this action is available from Anglian Water regarding operations however cumulative effects are considered unlikely with drought actions included within our Drought Plan given the absence of a pathway to effect to European Sites.
Affinity Water	Affinity Water measures to maintain supplies focus on optimising source performance, groundwater resting, intra/intercompany transfer (not including ESW), capital investment supply schemes, managing outages, drought permitting.	None of these measures interact with those included in our Drought Plan. No pathway to in-combination effects.
Thames Water	Thames Water's supply-side measures are categorised into: optimisation of existing sources, strategic schemes, bulk supplies, drought permits or orders, recommissioning of disused sources.	None of these measures interact with those included in our Drought Plan. No pathway to in-combination effects.
Cambridge Water	Cambridge Water does not border directly with our supply areas, but it was included in the assessment as it falls within our Drought Plan study area. The supply-side measures included within Cambridge Water's Drought Plan are outage reduction, bulk supply optimisation, use of existing licensed headroom, drought orders or permits and emergency droughts orders.	No in-combination effects identified.
ESW Water Resources Management Plan	The WRMP24 proposes supply-side options, including borehole abstraction, effluent re-use, reservoirs and transfers. These options proposed are closely linked to the actions set out in our Drought Plan, as well as to the plans of neighbouring water companies, given that the measures across all plans operate in-combination to provide a resilient regional water supply and safeguard essential supplies during drought conditions.	A cumulative beneficial effect has been identified, as the demand-side actions within our Drought Plan would act in-combination with the extensive demand-management programmes in our WRMP24 to reduce pressure on water resources during prolonged dry weather, when river flows and groundwater levels are below normal.
Other company WRMP	A review of the latest WRMPs from neighbouring water companies was undertaken and we have found no potential for in-combination effects.	No pathway to in-combination effects.
Other Plans		
Water Resources East Plan	The Regional Water Resources Plan supports several local, regional, and national plans and projects. It will have a direct link to water resources and water supply plans and policies.	A cumulative beneficial effect is identified as the demand management measures from our Drought Plan will have beneficial effects on the water environment in-combination with the extensive demand management programmes included in the Regional Water Resources Plan. This is achieved by reducing the pressure on water resources in periods of

Plan or Project	Summary	Potential for in-combination effect
		prolonged dry weather when river flows, and groundwater levels are well below normal.
Anglian River Basin Management Plan	The Anglian RBMP describes the planned steps to implement the measures required to achieve the environmental objectives of the WFD. It provides the framework for protecting and enhancing the water environment.	The HRA for the Anglian RBMP concluded that the risk of significant in-combination effects on European Sites arising from other plans is low, as the RBMP's objectives and actions are focused on improving the status of water bodies and achieving favourable conservation status for water-dependent Habitats sites.
National Significant Infrastructure Projects (73 currently identified, those within the Drought Plan study area detailed below)		
London area	2 NSIP: North London (Electricity Line) Reinforcement and North London Heat and Power Project. Located close to our supply side option for the bulk raw water transfer from Thames Water to Chigwell WTW.	Neither NSIP interact with water infrastructure or resilience of regional water supply. No pathway to in-combination effects.
South East area	3 NSIP: M25 J28 Improvements, Thurrock Flexible Generation Plant and Tilbury 2.	None of these NSIP interact with water infrastructure or resilience of regional water supply. No pathway to in-combination effects.
Eastern Area	16 NSIP: Only 1 (Sizewell C) is located in the vicinity of our Drought Plan supply-side actions.	The anticipated demand from the Sizewell C Project has already been incorporated into our WRMP24 demand forecast.
Strategic Resource Options		
Anglian Water	2 x SRO: Fens Reservoir and Lincolnshire Reservoir.	No overlap with our Drought Plan implementation period (2027-2032). No pathway to in-combination effects.
Affinity Water	3 x SRO: Grand Union Canal Transfer, White Horse Reservoir and Thames to Affinity Transfer.	No overlap with our Drought Plan implementation period (2027-2032). No pathway to in-combination effects.
Thames Water	3 x SRO: White Horse Reservoir, London Water Recycling Schemes and Water Transfer Projects. Only Beckton Water Recycling is located close to the boundary of our Drought Plan study area.	Beckton WR is intended to improve supply resilience (within London) and may indirectly support a contribution to a reduction to the wider regional water supply deficit, Cumulative effects are predicted therefore to be beneficial.
Cambridge Water	2 x SRO: Fens Reservoir and Grafham Reservoir.	No overlap with our Drought Plan implementation period (2027-2032). No pathway to in-combination effects.

6 CONCLUSIONS

6.1 Stage 1 Screening and Requirement for Appropriate Assessment

Stage 1 screening of our Drought Plan 2027 has indicated that Likely Significant Effects can be ruled out for all of the demand-side drought actions as none of the actions directly or indirectly affect any European Site.

Eight supply-side drought actions were not included for individual assessment as they relate to existing water supply, are separately licensed and therefore independently environmentally assessed by the regulators.

Tankering at Hartismere was assessed as having no pathway to effect to any European Sites. This is because tankers are filled with potable water directly from distribution network before travelling via road to different network node where water is returned to network. At no stage does this activity interact with any European Sites and as such there is no further requirement for Appropriate Assessment.

Two of the supply-side drought actions lie within hydrological ZoI of European Sites. At Coldfair Green, a hydrological pathway is present to two European Sites through the Hundred River, however the predicted change in riverine flow arising from the drought action is considered ecologically inconsequential to the functioning of the downstream European Sites. Furthermore, the Qualifying Interests of Sandlings SPA are not associated with any hydrological features. All other European Sites are not hydrologically or functionally linked to the abstraction of water at Coldfair Green and as such there is no further requirement for Appropriate Assessment.

Three European Sites are hydrologically connected to our proposed drought action at Denver. Modification to the HoF will not result in Likely Significant Effects on the Ouse Washes due to the confluence of the European Sites with the Great Ouse below Denver sluice and water level management in place to retain water within the Ouse Washes. A reduction in freshwater flows at Denver will reduce the freshwater inflows into the Wash. Modelling undertaken for the EAR indicates that changes in water velocity and river depth arising from the drought action are <0.06% and would result in negligible changes to sediment dynamics or water quality. The lower Great Ouse and inner Wash are tide-dominated estuarine systems where tidal prism and tidal currents overwhelmingly control hydrodynamic and sediment-transport processes relative to freshwater river discharge. As such the negligible change to freshwater inflows arising from the drought action will not prevent the achievement of conservation objectives relating to the extent, distribution, structure or function of habitats, supporting process, population or distribution of qualifying interests within each site[19][20]. Likely Significant Effects on qualifying interests of the

[19] Natural England. 2014. European Site Conservation Objectives for The Wash SPA (UK9008021) https://publications.naturalengland.org.uk/publication/5747661105790976 Accessed February 2026

[20] Natural England. 2014. European Site Conservation Objectives for The Wash & North Norfolk Coasta SAC (UK0017075) https://publications.naturalengland.org.uk/publication/5950176598425600

downstream European Sites can therefore be excluded, beyond reasonable scientific doubt.

The in-combination assessment demonstrates that there are no interactions between the Drought Plan and the delivery of other strategic plans and projects within the Drought Plan area.

HRA Guidance indicates that ESW shall adopt, or otherwise give effect to its Drought Plan, only after having ascertained that it will not cause a Likely Significant Effect on a European site. Stage 1 screening of the Drought Plan 2027 has indicated that Likely Significant Effects can be ruled out on all European sites both alone and in-combination.