

WESTERN RIVERSIDE WASTE AUTHORITY JOINT RESOURCES AND WASTE STRATEGY 2025-2040

SEA Statement of Determination

Report for: Western Riverside Waste Authority

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1 INTRODUCTION

1.1 THIS DOCUMENT

This document forms the Strategic Environmental Assessment (SEA) Screening Statement of Determination for the Joint Resources and Waste Strategy for Western Riverside Waste Authority (WRWA).

WRWA is the statutory body, or local authority, responsible for the management of the waste delivered to it by:

- London Borough of Hammersmith & Fulham
- · London Borough of Lambeth
- Royal Borough of Kensington and Chelsea
- · London Borough of Wandsworth.

1.2 PURPOSE OF THE JOINT RESOURCES AND WASTE STRATEGY

The Joint Strategy will set an over-arching vision, ambition and priorities of how the waste in each local authority will be collected, treated and processed over the next strategy period which will run from 2025 to 2040. The Strategy will set targets for waste reduction, reuse and recycling with regard to national and regional policies and targets. It will have regard to and be guided by an overarching legal and strategic framework as set out in the Environmental Protection Act 1990, the Environment Act 2021 and the Government's 25 Year Environmental Plan.

The strategy development process involves extensive analysis and modelling of the current baseline position for collection services for all WRWA members, developing future options for collection, treatment and disposal and assessing the Whole System Cost of the options across WRWA. Options are being developed in collaboration with WRWA and the constituent Councils through a series of workshops for officers, directors, and elected Members.

The Joint Strategy will define a plan for waste management services from 2025 to 2040 and thereafter will be updated on a ten-year basis.

1.3 THE JOINT STRATEGY AND THE SEA SCREENING PROCESS

The objective of 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.

The requirement for SEA was brought into legislation by the SEA Regulations¹. These regulations transposed the requirements of EU Directive 2001/42/EC (the SEA Directive) into English legislation. Following Brexit, minor amendments, to correct deficiencies and terminology, were made to the SEA Regulations through the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018.

Screening is the process of deciding whether a plan or programme requires SEA. It was considered whether a Strategic Environmental Assessment (SEA) would need to be conducted on the Joint Strategy. The Screening Statement was prepared in accordance with the requirements of the SEA Regulations. The Practical Guide to SEA was also taken into account.

A SEA screening consultation was prepared to enable the Consultation Bodies as specified in section 4 of the SEA Regulations to provide comment on the appropriateness of the screening process and its

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¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633) apply to any plan or programme which relates solely or in part to England.

conclusion for the Joint Strategy.

Those bodies are Natural England, Historic England and the Environment Agency. The consultation period on the SEA Screening Statement was for a period of 5 weeks and took place from 25th March 2024 to 29th April 2024.

The consultation period closed on the 29th April 2024 and a Statement of Determination (this document) has been produced indicating that the SEA screening process has been conducted in accordance with the SEA Regulations and available guidance and a determination has been made concluding that there are **no significant environmental effects from the Joint Strategy** and determining that **a full SEA is not required**. In accordance with the SEA Regulations the conclusions on the determination will also be made available to the public.

1.4 CONTEXT OF THE STRATEGY

Under Section 32 of the Waste Emissions Trading Act 2003, WRWA and its constituent councils have a duty to prepare and adopt a joint strategy in order to manage household waste and other waste similar in nature to waste from households (i.e. commercial waste) in their area.

The UK Government has set targets² to recycle 65% of municipal waste by 2035 and have no more than 10% of municipal waste being disposed to landfill by 2035. A net zero target has also been set in order to decarbonise all sectors of the UK economy by 2050 which includes the waste management sector.

The Joint Strategy must align with the UK's Resources and Waste (R&W) Strategy, which consists of three elements:

- Consistency in Collections (CC) an ambition for all English waste collection authorities to
 collect the same material streams, including food waste, in a consistent manner and to
 drive up recycling. This ambition is now clarified as "Simpler Recycling".
- Extended Producer Responsibility (EPR) a methodology for moving the full cost of dealing with packaging waste from households away from local taxpayers and Councils to the packaging producers, applying the 'polluter pays' principle.
- Deposit Return Scheme (DRS) the introduction of a scheme to reward consumers for returning empty drinks containers to 'reverse vending machines' to encourage recycling and reduce littering.

Some elements of the R&W Strategy were incorporated in the Environment Act 2021, granted Royal Assent in November 2021. However, the majority of the proposals in the R&W Strategy consultation will be implemented through secondary legislation.

Other key relevant legal framework and strategic guidance that the Joint Strategy must follow includes:

- Environmental Protection Act 1990
- The Environment Bill
- 25 Year Environmental Plan
- Circular Economy Package
- Net Zero Strategy
- Local Government Act 1999
- Mayor of London's Municipal Waste Management Strategy
- London Environment Strategy

² Waste Management Plan for England (publishing.service.gov.uk)

1.4.1 The Structure of the Joint Strategy

The Joint Strategy is currently subject to change in terms of structure and duration; however, the following themes are set to be explored:

- Overview "why we need a waste strategy"
- Current services and performance "where we are now"
- Future "what waste streams and volumes we expect to manage"
- Our vision and priorities "where we want to be"
- Roadmap "how we get there"
- Measuring success "how we measure performance"

1.4.2 The Strategy Area

WRWA is the statutory body, or local authority, responsible for the management of the waste delivered to it by:

- London Borough of Hammersmith & Fulham
- London Borough of Lambeth
- · Royal Borough of Kensington and Chelsea
- London Borough of Wandsworth

Figure 1.1 shows the location of these boroughs within London.

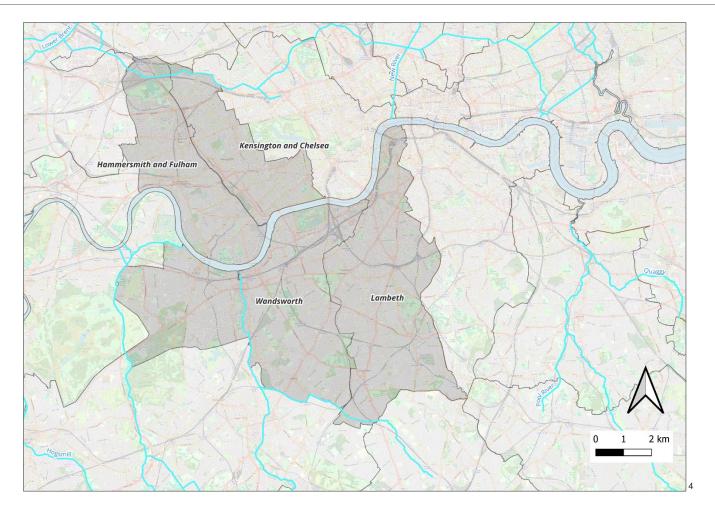
1.4.3 Responsibilities of the Partner Authorities

WRWA on behalf of the four constituent councils, is responsible as the 'waste disposal authority' for arranging the disposal of waste generated by the collection activities of the constituent councils of household waste and recycling, as well as from waste and recycling collections from local businesses that choose to use each constituent council's commercial waste services. The constituent councils also manage street cleansing, fly-tipping removal, and management of litter from local parks and open spaces, that all generate waste which WRWA is responsible for managing.

WRWA is the 'joint waste disposal authority' for the area and is responsible for providing treatment and disposal services for the waste and recycling collected by the constituent councils. WRWA also operate one Household Waste and Recycling Centre at Smugglers Way where residents can deposit a wide range of materials for reuse, recycling and disposal.

The four constituent councils have all declared climate emergencies in 2019 and committed to achieving Net Zero in council operations by 2030. Additionally, London has declared a climate emergency as declared by the Mayor of London in 2018 with a target to recycle 50% of Local Authority Collected Waste (LACW) by 2025. The Joint Strategy will refer to these targets alongside the policies and targets set for waste management and climate change as set by the constituent councils.

Figure 1.1: Map of the WRWA area³



³ Contains OS data @ Crown copyright 2024

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1.4.4 Baseline Collection Methods and Frequencies

Table 1.1 summarises the current baseline collection methods and frequencies across the Strategy area. Currently, Hammersmith and Fulham, Kensington and Chelsea and Wandsworth collect food waste and garden waste separately, with the treatment facilities for these are anaerobic digestion (AD) and Open Windrow Composting respectively. Lambeth currently co-collects food and garden waste, so this is sent for treatment at an in-vessel composting (IVC) facility.

1.4.5 Refuse Collection Options

The Joint Strategy will model five collection options in addition to a modelled baseline projected to a future year (*known as a Baseline Plus). For the Joint Strategy, the Baseline plus will be modelled to financial year 2027/2028 and will incorporate population increase, and the impacts of legislation including Extended Producer Responsibility, the Deposit Return Scheme and Simpler Recycling, specifically the requirement for councils to separately collect food waste boroughwide.

A set of five collection options will be modelled for each borough for the financial year 2027/2028 as shown in **Table 1.2**. Options 1-4 will utilise the current collection frequencies and containers used by each borough and will focus on co-collection of materials and associated vehicle changes. Option 5 will demonstrate a high performing collection, where participation levels will be increased, and containers and collection frequencies will be changed to maximise recycling performance.

- Option 1: Separate collection of Residual, comingled Dry Mixed Recycling (DMR), Food and Garden waste.
- Option 2: Separate collection of Residual and comingled DMR and co-collection of Food and Garden waste.
- Option 3: Co-collection of Residual and comingled DMR, and separate collection of Food and Garden waste
- Option 4: Co-collection of Residual and comingled DMR, and co-collection of Food and Garden waste
- Option 5: Separate collection of Residual, comingled DMR, Food and Garden waste. Residual
 will move to a fortnightly collection, with wheeled bins. DMR will move to a weekly collection
 with wheeled bins.

Options 1, 3 and 5 will involve the separate collections of food and garden waste.

For Options 2 and 4, food and garden waste are co-collected.

. No new infrastructure is required as a result of this Strategy development and implementation.

1.4.6 Treatment Options

Depending on the baseline collection scheme of each borough, the treatment options may change as a result of the collection method of food and garden waste for each option. For all options, the treatment facilities for Residual and DMR will be the Energy from Waste facility (EfW) and the Materials Recycling Facility (MRF) currently used by all boroughs.

Where options specify the separate collection of food and garden waste, the treatment facilities will be Anaerobic Digestion (AD) and Open Windrow Composting respectively.

This means that, for options 1,3 and 5, the treatment facilities will be the same as the Baselines (for Hammersmith and Fulham, Kensington and Chelsea and Wandsworth). Whereas for options 2 and 4, co-collected food and garden waste requires treatment at an IVC.

For options 1 and 3, Lambeth will treat separate food and garden waste in the same way as the other three boroughs.

This strategy does not explore options for any new infrastructure or treatment processes. In terms of treatment, it is only concerned with options involving a change in destination of relatively small volumes of food and garden waste between different existing facilities depending on whether they are collected separately or mixed.

Table 1.1: Summary of the Current Baseline Collection Methods and Frequencies across the Strategy Area

			Residual			Dry Mixed Recyclables (DMR)			Food waste			Garden waste		
			Frequency	Vehicle	Container	Frequency	Vehicle	Container	Frequency	Vehicle	Container	Frequency	Vehicle	Container
	Hammersmith & Fulham	Standard properties	Weekly	26T Twin Pack - Co- collection with DMR	Wheeled bins/Sacks	Weekly	26T Twin Pack - Co- collection with Residual 26T RCV	Wheeled bins/Sacks	Weekly (trial)	7.5T Refuse Collection Vehicle (RCV)	Caddy			
		Flats	Weekly	RCV Open Back	Sacks	Weekly	Open Back	Wheeled bins/Sacks						
	Kensington & Chelsea	Standard properties	Twice Weekly	26T Twin Pack - Co- collection with DMR	Sacks	Twice Weekly	26T Twin Pack - Co- collection with Residual	Sacks	Weekly (trial)	12T RCV	Caddy	Fortnightly	18T RCV	Sacks
		Flats	Twice Weekly	26T RCV/18T RCV	Communal bins	Twice Weekly	18T RCV	Communal bins	Weekly (trial)	12T RCV	Wheeled bin			
Baseline		Narrow access properties	Twice Weekly	12T RCV	Sacks	Twice Weekly	12T RCV	Sacks	Weekly (trial)	12T RCV	Caddy	Fortnightly	18T RCV	Sacks
	Wandsworth	Standard properties & Narrow access	Weekly	26T Twin Pack - Co- collection with DMR	Sacks	Weekly	26T Twin Pack - Co- collection with Residual	Sacks						
		Flats	Weekly	26T RCV	Communal wheeled bins	Weekly	26T RCV	Communal wheeled bins						
	Lambeth	Standard properties	Weekly	26T RCV	Wheeled bins	Weekly	26T RCV	Wheeled bins/sacks	Weekly - co- collected with garden	26T RCV	Food waste - caddy Garden waste - reusable sack	Weekly - co- collected with food	26T RCV	Food waste - caddy Garden waste - reusable sack
		Flats	Weekly	26T RCV	Communal wheeled bins	Weekly	26T RCV	Communal wheeled bins	Weekly (trial)	26T RCV	Caddy			

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Table 1.2: Strategy Options with corresponding Treatment facility type; also showing Baseline Treatment facility type

	Residual Waste	Dry Recycling	Food Waste	Garden Waste	Additional information	Residual Waste	Dry Recycling	Food Waste	Garden Waste
Baseline (2022/23)	See specific baselines for boroughs above in Table 1.1							Lambeth: IVC K&C, H&F and Wandsworth: AD	Lambeth: IVC K&C,: Open Windrow
Baseline +	Same as Baselir	ne but with waste arising	gs and housing proje	ected for future year	- 2027/2028			Same as baseline	
Option 1	Separate collection, frequency to stay the same as baseline +	Separate collection, frequency to stay the same as baseline +	Borough-wide, separate weekly collection	Separate, fortnightly, charged				All boroughs: AD	All boroughs: Open Windrow
Option 2	tion 3 Co-collection of residual with DMR – frequency to stay the same as baseline +				Energy from Waste (EfW)	MRF	All boroughs: IVC	All boroughs: IVC	
Option 3			Borough-wide, separate weekly collection	Separate, fortnightly, charged				All boroughs: AD	All boroughs: Open Windrow
Option 4			Borough-wide, mixed weekly collection, GW charged				All boroughs: IVC	All boroughs: IVC	
Option 5: 'high performing' collection system including increased set-out rate, recognition rate, and participation rate	Separate collection, fortnightly, 140L bins (where possible), no side waste. Flats on weekly collection.	Comingled, weekly, 240L bins (where possible). Flats on weekly collection.	Borough-wide, separate weekly collection	Separate, fortnightly, charged				All boroughs: AD	All boroughs: Open Windrow

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2 THE SEA SCREENING PROCESS

2.1 THE REQUIREMENT FOR SEA

As stated in the SEA Regulations, the requirement for a SEA applies to waste management plans, programmes and strategies. A SEA is only required if the Strategy 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 SEA⁵ provides a framework for determination of the requirement for SEA (the screening process) in a staged flow-diagram (see Figure 2.1).

In accordance with **Figure 2.1**, 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 2.1**.

⁵ 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 2.1 Application of SEA

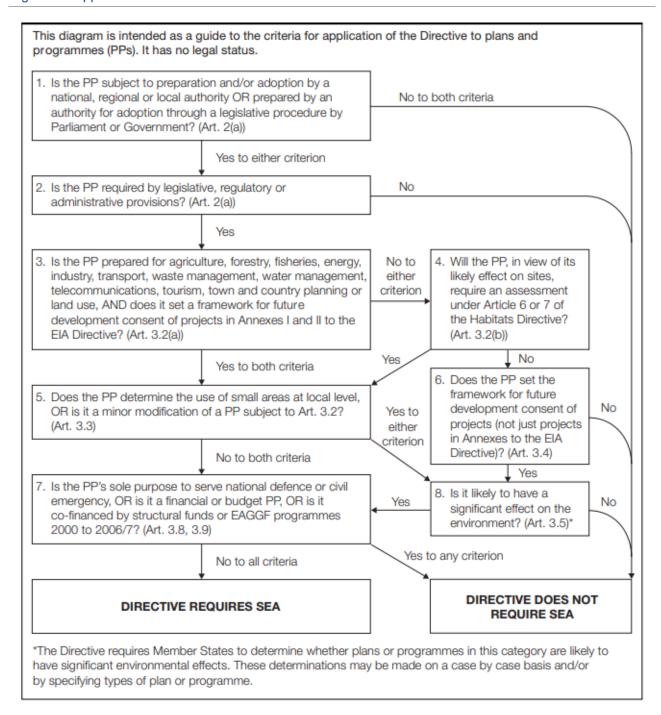


Table 2.1 Consideration of the Likely Significant Effects

	Screening Question	Screening Assessment
1	Is the strategy 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?	Yes The Joint Strategy sets out how WRWA and the four partner authorities/constituent councils, namely the London Borough of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea, London Borough of Lambeth and the London Borough of Wandsworth will work together to preserve resources by minimising waste, promoting resource efficiency and moving towards a circular economy.
2	Is the strategy required by legislative, regulatory or administrative provisions?	Yes WRWA has a statutory responsibility for the collection and treatment of waste from the four constituent councils, including refuse, recycling, street cleansing and other waste materials.
3	Is the strategy prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, 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?	No Whilst the Joint Strategy is prepared for waste management it does NOT set a framework for future development consent of projects in Annexes I and II to the EIA Directive. WRWA will be implementing a separate Procurement Strategy which is more likely to address this scope.
4	Will the strategy, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive	No The implementation of this Joint Strategy will not have any likely significant effects on sites. This Joint Strategy sets the direction of travel for the development of waste collection and treatment services for the streams for which WRWA are responsible, with ancillary work on promoting waste reduction and reuse also included. The Joint Strategy emphasises the need for more reuse but does not set out any specific locations or activities. WRWA and the four constituent councils in their separate capacities as local planning authorities will assess area-wide landuse policy for waste management through a review of the Joint Waste Development Plan.
5	Does the strategy determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	No The Joint Strategy covers the administrative areas of WRWA area, comprising of the above four constituent councils.
6	Does the strategy set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	No The Joint Strategy does not set the framework for future development consent of projects. The Strategy does not set out any specific needs or locations. The four constituent councils in their separate capacities as local planning authorities

	Screening Question	Screening Assessment
		will assess area-wide land-use policy for waste management through a review of the Joint Strategy.
7	Is the strategy 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 finds or EAGGF programmes 2000-2006/7?	No The purpose of the Joint Strategy 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?	No The Joint Strategy sets out strategic aims and ambitions for resources and waste management of the partner authorities of the WRWA. All four constituent councils have declared climate emergencies in 2019 and are committed to achieving Net Zero in their operations by 2030.

2.2 DETERMINATION OF SIGNIFICANCE

In accordance with the SEA Regulations the likely significant effects of the Joint Strategy have been considered in relation to the SEA Screening criteria and are presented in **Table 2.2**.

Table 2.2 Consideration of significant environmental effects of the Joint Strategy

SEA Screening Criteria	Summary of Predicted Environmental Effects	Significant Environmental Effect?
1. The characteristics of p		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The Joint Strategy will not provide a policy framework or allocate resources. Instead, it provides the evidence base for local needs as well as the context and priorities of national and regional waste and resources policy for the local area. The Joint Strategy prescribes no significant alterations to the location, nature, size or operating conditions of potential facilities related to waste management. The Joint Strategy provides a framework for the Partner Authorities to seek to explore and investigate options in collaboration with wider organisations as well as promoting initiatives to the community. In terms of specific changes to the waste and recycling services that are already in place across the area, the Joint Strategy seeks to implement anticipated new national requirements for separate food waste collections and exploring different ways of collecting other recyclable materials which are already being collected. These are not considered to entail a significant environmental effect.	No
b) the degree to which the plan or programme	The Joint Strategy is a strategic framework document in the local context that sets out the high-level aspirations for	No

SEA Screening Criteria	Summary of Predicted Environmental Effects	Significant Environmental Effect?
influences other plans and programmes including those in a hierarchy;	waste and resource management. The Joint Strategy is influenced by a number of plans and programmes, nationally and regionally, within which there are a number of policy drivers that will influence how the Partner Authorities manage resources and waste in the future.	
	The Joint Strategy itself has limited direct influence over other plans and programmes and therefore, it is not considered to entail a significant environmental effect.	
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The Joint Strategy is relevant for the integration of environmental considerations to minimise waste arising and maximise waste reduction, reusing and recycling. The London Plan and the constituent councils' Local Plans set the policies for sustainable development. The objectives in the Joint Strategy will not change Local Plan policy.	No
(d) environmental problems relevant to the plan or programme;	The Joint Strategy will set targets for waste reduction, reuse and recycling all in accordance with national and regional policies and targets. Objectives set out in the Strategy are not anticipated to introduce or exacerbate environmental problems.	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The Joint Strategy supports targets for recycling and landfill diversion. The Strategy also contains aims, objectives, and priorities to facilitate treatment of waste in line with the waste hierarchy. The Strategy will supplement Local Plan policies and is not relevant to the implementation of Community legislation on the environment.	No
2. Characteristics of the e will the environmental effe	particular, to (i.e.	
(a) the probability, duration, frequency and reversibility of the effects;	It is not envisaged that the implementation of the Joint Strategy is likely to have any significant negative environmental effects. The Strategy will set out waste collection and treatment options around existing infrastructure and local priorities and aspirations. Whilst it does not set out any specific needs or locations a number of the objectives and priorities proposed aim to deliver improved performance in line with wider regional and national targets.	No
(b) the cumulative nature of the effects;	The Joint Strategy is designed to improve environmental protection/performance, and therefore there are no negative cumulative environmental effects envisaged for the strategy. The Strategy is consistent with the waste hierarchy and therefore will promote that waste is treated increasingly in a more sustainable and environmentally friendly manner, meaning pollution and other negative	No

SEA Screening Criteria	Summary of Predicted Environmental Effects	Significant Environmental Effect?
	environmental impacts are reduced over the life of the Strategy.	
(c) the transboundary nature of the effects;	The Joint Strategy will not provide a policy framework or allocate resources. Instead, it provides the evidence base for local needs as well as the context and priorities of national and regional waste and resources policy for the local area. The Strategy does not set out any specific needs or locations. The Strategy intends that changes in waste collection and treatment should move waste up the Waste Hierarchy where possible, and therefore any potential effects of service changes will entail an environmental performance improvement within the boundaries of the WRWA area.	No
(d) the risks to human health or the environment (for example, due to accidents);	There are no expected additional risks to human health and/or the environment arising from the implementation of the strategy. Key priorities in the evaluation of Joint Strategy options include carbon reduction and minimising environmental impact.	No
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The spatial extent of the Joint Strategy is contained within the constituent councils' Local Plan areas. The Strategy does not seek to expand current waste management operations in the area. It seeks to reduce waste growth, increase reuse, repair and recycling. The Strategy seeks to improve waste management which is considered to have positive effects in the WRWA area.	No
(f) the value and vulnerability of the area likely to be affected due to- (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	The Joint Strategy is not site specific and has been considered alongside sustainability issues as described in criteria 1(d). Furthermore, the implementation of the Strategy will not remove protection for any such areas and therefore there are no significant effects associated with the Joint Strategy.	No
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The Joint Strategy will not remove any protection for areas with a recognised community or international protection status. The strategy will encourage improved environmental performance. It is anticipated that the Strategy will not impact protected areas.	No

SCREENING REPORT AND CONSULTATION PROCESS

2.3 SCREENING REPORT AND CONSULTATION PROCESS

A SEA Screening Statement, as specified in section 4 of the SEA Regulations, was prepared to enable the Consultation Bodies to provide comment on the screening process and its conclusion for the Joint Strategy.

WRWA consider that the Joint Strategy does not require a full SEA.

The bodies consulted for this Strategy were Natural England, Historic England and the Environment Agency. The consultation period on the SEA Screening Statement ran for five weeks, as is standard practice, from 25th March 2024 to 29th April 2024.

No responses were received from two statutory consultees; the Environment Agency and Historic England. Natural England responded stating that they had no comments to make.

The final element of the SEA process in this instance, is a Statement of Determination (this report) indicating that the SEA screening process has been conducted in accordance with the SEA Regulations and available guidance, and a determination has been made on the likely 'significant environmental effects' of the Joint Strategy.

3 CONCLUSION

The scope of the WRWA Joint Strategy has been considered against the criteria from the Practical Guide to SEA⁶ and the SEA Regulations.

It is considered that the Joint Strategy will not set a framework for future development consent of projects. Also, the aims, objectives and priorities that will be set out in the Joint Strategy are focussed on exploring ways to work together and in partnership with the local community and other organisations to deliver sustainable systems for managing resources and waste in accordance with wider established targets and evolving legislation. Waste collection and treatment options are being explored to deliver these aspirations using existing treatment facilities and sites already in use within WRWA's operational boundary. For these reasons and following the results of the consultation with the statutory consultees, it is determined that no significant environmental effects will result from the Joint Strategy. Therefore, it is considered that there is **no requirement for a full Strategic Environmental Assessment.**

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⁶ 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.



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