



**South West
Water**

Appendix

**Responses to Strategic Environmental
Assessment of our Water Resources
Management Plan**

Contents

1. Consultation responses relating to SEA	3
Environment Agency	3
Historic England.....	12
Natural England.....	21
Westcountry Rivers Trust.....	37

1. Consultation responses relating to SEA

Note:

Our draft WRMP Strategic Environmental Assessment (SEA) Environmental Report was published for consultation in February 2023 alongside our WRMP. To ensure that this SOR provides a comprehensive record of all feedback received from customers and stakeholders on the SEA, the feedback and our responses to these are recorded below. All amendments and updates made to can be seen in Appendix 7 of our WRMP.

ID Reference: 082 Environment Agency	
Feedback	South West Water Response
In the Wimbleball WRZ, one option is to increase the treatment capacity of Pynes WTW to the licence volume, which would be an additional 3.25Ml/d. The Pynes abstraction licence is subject to a PR24 WINEP investigation. Using this source above recent actual volumes could pose a risk under WFD no deterioration.	The WFD assessment for this option identifies a precautionary potential risk of deterioration from this option. The WFD assessment will be updated to acknowledge the PR24 WINEP investigation and that the viability of this option will be dependent on the outcome and associated consultation with the EA.
The WIM8 option is for the company to complete works to enable the permanent use of Brampford Speke boreholes, and would provide a benefit of 2Ml/d. This licence is under investigation in AMP7 as there is a risk of WFD deterioration if used. This investigation has not concluded so there is no guarantee that there will be water available.	The WFD assessment for this option will be updated to include a precautionary risk of deterioration pending the outcome of the PR24 WINEP investigation. Reporting will acknowledge that the viability of this option will be dependent on the outcome of the PR24 WINEP investigation and associated consultation with the EA.
In its WRMP, South West Water have outlined that one of its options is to complete works to enable the permanent use of the Stoke Cannon boreholes. This licence is under investigation in AMP7 as there is a risk of WFD deterioration if used. This investigation has not concluded so there is no guarantee that there will be water available.	The WFD assessment for this option will be updated to include a precautionary risk of deterioration pending the outcome of the PR24 WINEP investigation. Reporting will acknowledge that the viability of this option will be dependent on the outcome of the PR24 WINEP investigation and associated consultation with the EA.
<p>In a meeting in December 2022, the company anecdotally told us that it had used National Framework data to inform its SEA.</p> <p>The Long-term destination guidance sent to regional groups in October 2020 sets out that the data should be reviewed in conjunction with Environment Agency staff due to the number of high-level assumptions used in creating the dataset. This is linked to recommendation 5.3.</p> <p>The National framework data provided was to provide an indication of future hotspots only. As such, we have assessed that the national framework data has been used unsuitably in the SEA Chapter.</p>	National Framework data has not been used in any of the SEA Assessments. Datasets used are listed in Table E.17 of the Environmental Report and comprise publicly available datasets from sources such as Defra, Local Authorities, the Environment Agency and Natural England, in addition to local datasets requested from Local Authorities.

<p>In its WRMP, South West Water present a number of supply side options which are linked to designated sites.</p> <p>The company have produced an informal HRA as part of its plan. This informal HRA does not contain sufficient detail for the company to carry out a Stage 1 assessment or Appropriate Assessment. As such, there is not enough evidence to determine the impact of the plan on designated sites.</p> <p>The informal HRA clearly outlines that conclusions cannot be drawn from its assessment, however the WRMP asserts that the HRA indicates no LSE. It is unclear how the company have made this assessment based on the information presented. Additionally, the WRMP guidance, sent to companies, states HRAs including an appropriate assessment should be carried out as part of the companies' plans, if it would likely impact on a European site (section 4.1.1).</p>	<p>At the current stage, there is some uncertainty in relation to specific options where information has not been developed sufficiently to fully identify the degree of potential effects on Habitats Sites from the plan in relation to the HRA. Therefore, additional assessments are required to obtain the requisite amount of information to inform the findings and associated mitigation required for potential effects which cannot currently be quantified. When sufficient information is available it will be reflected in updates to the relevant assessments.</p>
<p>In Chapter 8 App 8.2 South West Water outline all of the supply options it has considered feasible in its plan. Table 0.4 in the SEA sets out which options the company has considered in its SEA. However, there are a number of options in the SEA Table 0.4 which are not described in Chapter 8 App 8.2. These are:</p> <ul style="list-style-type: none"> · COL20 - New River Fal surface water abstraction · BNW10 - Christchurch WWTW IPR1 Transfer to River Avon · ISMY3 - St Mary's 100% seawater desalination plant · ISMY8 - St Mary's - Increase service reservoir capacity · ISB3 - Bryher - 100% seawater desalination plant · ISB5 - Bryher - Link Tresco and Bryher with pipeline- ISB8 - Bryher – Increase service reservoir capacity · IST6 - Tresco – Increase service reservoir capacity · ISMT1 - St Martin's new groundwater source · ISMT3 - St Martin's – 100% seawater desalination plant · ISMT6 - St Martin's – Increase service reservoir capacity · ISA1 - St Agnes new groundwater source · ISA3 - St Agnes – 100% seawater desalination plant · ISA6 - St Agnes – Increase service reservoir capacity 	<p>This comment was already accounted for within the February consultation version of the SEA Environmental Report, rather than the 'work in progress' January version of the Environmental Report which has been commented on. Options outlined within Chapter 8.2 of the draft WRMP correctly match those assessed within the consultation version of the SEA Environmental Report.</p>
<p>In its plan, South West Water display supply side option implementation dates in a number of chapters and in the planning tables. However, on a number of occasions the dates for the options are not consistent. As an example, Chapter 13 says Wimborne transfer to Longham is expected to occur in 2027 which is different to 2045-46 in Chapter 11.</p>	<p>This comment has been acknowledged and consistency checks will be made to ensure dates in the SEA align with Chapter 11.</p>
<p>Section 10.6 of the WRMP guidance outlines the expectation that water companies produce at minimum three programmes for their plans. These are:</p> <ul style="list-style-type: none"> · Least cost · Best value 	<p>All plans available in Jan/Feb 2023 at the time of writing the Environmental Report were assessed in the SEA.</p>

<p>· Best for the environment and society</p> <p>In its plan, South West Water have presented a least cost and best value programme but have not presented a best for environment and society programme. Additionally, South West Water have included a worst-case programme in its SEA, but this has not been included in its plan.</p> <p>Whilst the company have looked at some programmes in its SEA, South West Water have not considered the best for environment and society in its SEA.</p>	<p>The preferred plan and alternatives are currently being revised by SWW. SEA assessments for all plans will be included in the Environmental Report for the rdWRMP24.</p>
<p>In its Natural Capital assessment, South West Water have provided qualitative options for enhancement and mitigation for its best value plan. However, they do not provide a quantitative analysis of enhancement and mitigation</p>	<p>The quantitative natural capital assessments (NCAs) have been undertaken to understand the likely impacts on natural capital stocks, and resulting impacts on ecosystem services, and, in this way, inform the selection of options for the SWW WRMP24. By reflecting the impacts associated with each option, the assessments have informed the decision-making process and resulted in a reduction of adverse impacts and increase in environmental benefits.</p> <p>The majority of these options are at the concept stage of design and have not been informed by survey data. Therefore, it is not possible at this stage to develop quantitative mitigation and enhancement proposals for natural capital. The opportunities for mitigation and enhancement will be further identified and quantitatively developed in the later stages of design development for each option.</p> <p>It will be important that the natural capital proposals align with both the local ecology (informed by survey data) and the biodiversity net gain proposals, for which opportunity areas have now been identified as part of the WRMP24 reporting but similarly require further design development for detailed quantitative BNG proposals.</p>
<p>As part of the Natural capital assessment, it appears South West Water have qualitatively assessed all the services and, as South West Water have provided some commentary on the monetisation, quantitatively assessed some services. However, there is a lack of required visibility and clarity in the plan to confirm that minimum practice has been applied for each ecosystem service as outlined in the Environment and society in decision-making supplementary water resources planning guidance.</p>	<p>The report will be updated to provide greater clarity on alignment with the WRPG's Environment and Society in Decision-making supplementary guidance (ESDMSG).</p> <p>It should be noted that both water purification and water regulation were assessed qualitatively, but not quantitatively. This aligns with the approach undertaken for the regional investment modelling process, used to inform decision-making and the selection of South West Water WRMP24 options. For water purification, the ESDMSG recommends the NEVO tool as a minimum quantitative assessment. However, in addition to the other limitations noted in the ESDMSG guidance, the tool does not have full coverage of the water resource zone operational areas for the region, including some South West Water areas, and therefore could not be consistently applied across the option assessments.</p> <p>For water regulation, as set out in the report, a qualitative approach was undertaken to avoid double accounting of benefits with capacity-based and financial assessments. Furthermore, the complexity of the assumptions required to undertake the assessment would introduce uncertainty into any quantification approach and effectively discount the outputs from being used in decision-making. The EA supplemental guidance</p>

	<p>recommends, as a minimum approach for quantitative assessment, that the user "consider the value (both to the economy and environment) of water left in the environment for other existing and future users and businesses". A quantitative assessment would require a series of assumptions regarding current value of the water supply (using artificially controlled prices as a proxy for intrinsic value to nature), future availability and future use. The EA guidance then explicitly recommends that the provided method for monetisation is not used for decision making.</p>
<p>South West Water's Natural capital report is lacking transparency the methodology it has used. The sources of all data were provided; however, some ecosystem services are less well documented than others (water regulation and hazard regulation). It is also not clear if the price basis has been made consistent across all ecosystem service to allow for comparison of impacts.</p>	<p>Regarding the use of a consistent price year, the report is currently being updated and further clarity will be provided on the price year used for the natural capital assessment. Regarding transparency, it is agreed that all data sources have been included within the report for the individual ecosystem services. The methodological text will be reviewed for opportunities to increase transparency, including additional text for water flow regulation and a review of the natural hazard regulation text for improving clarity.</p>
<p>In its assessment, South West Water have considered mitigation, enhancement and the habitat units needed to provide 10% biodiversity net gain. The plan does not appear to contain the actual solutions the company would implement but contains things it could do. Additionally, the benefits are only stated and there is no evidence of the options being able to achieve 10% biodiversity net gain. There is also no evidence of the relevant increase in natural capital that comes from the mitigation and enhancement within the options.</p> <p>Additionally, information is included in the report on biodiversity net gain figures associated with the preferred plan indicating a gain of 262.82% units, however certain options in the preferred plan result in a loss of natural capital.</p> <p>The plan has such a large impact on riverine systems that the company could be more ambitious and exceed the legally required 10% biodiversity net gain.</p>	<p>The report has been updated to include a quantitative BNG Opportunity Mapping exercise, which can be used to similarly inform the development of natural capital proposals. The BNG results have been updated following the incorporation of new options. The Environment Act 2021 requires all new developments to deliver a minimum of 10% BNG, and therefore, all new options delivered as part of the WRMP24 will be required to demonstrate at least 10% BNG, subject to the requirements of individual local planning authorities that may exceed the minimum 10% BNG requirement. The BNG Opportunity Mapping exercise can be used to inform the development of those detailed BNG proposals in later stages of option design. The habitats delivered to achieve the 10% BNG should also be designed to support and enhance ecosystem services.</p> <p>As noted in the report, some of the mechanisms for delivering BNG, such as the purchase of biodiversity credits, as well as the individual requirements set by various local planning authorities (LPAs) are still being developed. Furthermore, many of the WRMP24 options are at the concept stage of design and are not supported by survey data, and therefore it is not possible to develop detailed mitigation and enhancement proposals for delivering 10% BNG and natural capital proposals at this stage.</p> <p>The natural capital assessment (NCA) and BNG assessments undertaken for each option have been used to directly inform the selection of South West Water's WRMP24 Best Value Plan, and thus have contributed to the overall reduction in potential impact on natural capital stocks and biodiversity units. South West Water has undertaken a mapping exercise for identifying BNG opportunities in greater detail, linking those opportunities with available and forthcoming LPA requirements, and providing the basis for delivering new natural capital stocks that will support both ecosystem services and the local biodiversity that underpins those services.</p>

<p>Section 8.3 of the WRMP guidance lists the information that should be provided for each option. Missing information includes:</p> <ul style="list-style-type: none"> · Feasible Options Natural Capital · Feasible Options Biodiversity Net Gain <p>This information for the preferred plan on the above matters appears to be included in Chapter 13.</p>	<p>All feasible options were assessed for BNG and NCA as part of the WRMP process and reported in the technical appendices of the SEA Environmental Report. Some options were screened out of the BNG/NCA assessments due to the nature of the options.</p> <p>Please note that the BNG and NCA report had not been updated in the 'work-in-progress' January 2023 version of the SEA Environmental Report. These were completed and published in the February 2023 consultation version.</p>
<p>Chapter 2 sets out the context for the WRMP24 and the WRZs included in the WRMP but does not set out the objectives of the plan. Tables 3.1 and 3.2 in Chapter 3 set out the supply and demand options included in draft WRMP24 (58 supply options and 16 demand options across WRZs), however it does not state the preferred options included in the best value plan to be taken forward. Objectives of the WRMP24 are also not outlined in the SEA.</p> <p>Chapter 11 outlines the preferred plan (Best value option), but in a table form with acronyms for the options to be taken forward, which is not very clear to the reader. A summary of the plan itself would aid the reader in the SEA. Some indicative construction timeframes are referred to in the cumulative effects assessments in Tables 11.7-11.9, but no further timeline is provided in the SEA.</p>	<p>It is acknowledged that the objectives of the plan should be incorporated into Chapter 2, this will be updated for the next iteration of the SEA Environmental Report.</p> <p>The preferred options within the BVP are set out in Tables 10.1 & 10.2 of the SEA Environmental Report. Although acronyms are used in the table, full option names are provided in Table 2.1. A summary of the BVP can be incorporated into Chapter 10 for the next iteration of the SEA Environmental Report to aid the reader.</p> <p>If further construction timelines are available for the rdWRMP24, further detail will be incorporated into tables 10.7-10.9 of the SEA Environmental Report.</p>
<p>SROs were not considered in the SEA framework, and as such their predicted impacts are absent from the Chapter 11 summary tables and narrative. Sections 11.2.2 and 11.2.20 state there are no major negative effects of the preferred plan (at construction and operation). It is unclear whether if SROs were part of the preferred plan whether this would still be the case.</p> <p>In Chapter 10, the company state that 3 additional options have been considered as part of the plan and these have not been assessed under the SEA, HRA,WFD or INNS. It states these assessments were planned in early 2023. These assessments are still required and need to be taken into account in the overall SEA conclusions to influence the final plan selection.</p>	<p>The three additional options were referenced in previous revision of the Environmental Report (January 2023 'work in progress', revision E). Between Revision E and F (February 2023 consultation version) of the report, there were multiple changes to the supply options. These were all assessed and included within revision F. Since this time, further options have been identified and developed by SWW for the rdWRMP24, which have also undergone assessment.</p> <p>Regarding the assessment of SROs, section 8.5.1 of the Environmental Report states 'SROs have already undergone environmental assessment through the RAPID Gate 1 process and these assessments have been used to inform the SWW WRMP24 development'. We liaised with the SRO environmental assessment teams to share approaches and understand effects. The summary of effects of the SROs (based on their SEAs undertaken for the RAPID process) can be found in section 9.8 of the Environmental Report. SROs were also included in the cumulative effects assessment. As the SROs were not assessed using the SWW WRMP24 assessment framework, their SEA results are not included within the plan SEA summary tables. However, it is acknowledged that their effects should be more clearly stated in the plan summaries, and additional narrative will be provided in the SEA Environmental Report for the updated plans.</p>
<p>Cumulative effects have been considered at the plan level for the Best Value Plan (preferred plan) and the two plan alternatives (Least Cost and Worst Case). This</p>	<p>The cumulative effects of neighbouring water companies, WRMP and Drought Plans were considered within the SEA Environmental Report, within Section 10.5.23.</p>

<p>considers both Intra and Inter project cumulative effects. Inter effects with other plans and projects are set out in the remainder of Chapter 11. However, neighbouring companies WRMPs appears to be missing from the list of plans that have been considered in the cumulative effects. The company only seem to consider neighbouring companies drought plans. Linked to improvement 16.2, it is unclear to what extent the SROs have been considered in the cumulative effects assessment in Chapter 11, given they have not been assessed in the SEA.</p> <p>Finally, it is unclear how the HRA and WFD assessments considered cumulative effects given these were undertaken at the individual option level. Chapter 11 provides some indication of cumulative effects on designated sites, it is unclear how this has been addressed in the HRA.</p>	<p>Now that the draft WRMP Plans for Southern Water and Wessex Water have been published, we will expand on cumulative effects further within the next iteration of the dWRMP, as more information is now publicly available.</p> <p>Regarding HRA at the plan level to assess cumulative effects, it is acknowledged that with further information, it would be possible to identify crossover in Habitats Sites, and in-combination effects for HRA could be expanded upon.</p> <p>Cumulative effects assessments for WFD are set out in the WFD Technical Note (SEA Environmental Report, Annex 3). These assessments combine the potential effects for all options which take place within a single waterbody, and assess whether the combination of these options could lead to a risk of deterioration.</p> <p>The comment on SROs within cumulative effects is addressed within response to I16.2 (SROs in SEA).</p>
<p>A PPP review has been undertaken as part of the SEA. However, the PPP review does not appear to include neighbouring WRMPs and Drought Plans and the Regional Plan.</p>	<p>The PPP review now includes the WRMP, Drought Plans, and DWMPs for Wessex Water and Southern Water (the neighbouring water companies). The Draft Regional Plan was already included.</p>
<p>The SEA outlines that the company included a buffer zone around the plan area to capture any additional receptors that may be affected by WRMP24, but it does not indicate the scale of this buffer or include a map showing the overall SEA study area. This is particularly relevant for the geographical area between Bournemouth and Wimbleball WRZs. Later sections of the report indicate a 10km buffer for HRA.</p> <p>The summary included in Chapter 6 covers the main SEA topics to be considered but is quite high level in nature and limited information is provided on condition of baseline. Future baseline is good for some topics, but very limited for others, focussing on national plans rather than geographically specific trends. As an example, water is good but biodiversity is limited. It is also not clear what temporal scope has been considered when describing the future baseline of each SEA topic.</p>	<p>A map displaying the study area can be included within the updated Environmental Report, as well as assessment text regarding cross boundary issues in relation to the SEA topics within the Plan area and clarification on temporal scope of the assessment.</p> <p>Initially within the SEA assessments, designated sites had a buffer of approximately 5km to enable the high-level assessment of the options. The SEA then drew on HRA findings, which utilised a buffer of up to 10km. Impacts are not solely distance based, therefore these distance thresholds were used as starting points. Biodiversity sites were reviewed beyond this initial threshold to identify additional sites which may be connected to or affected by the options. Options were assessed for their full lifetime, not just the 25 years of the WRMP24.</p> <p>Other text suggestions captured within the comment will be reflected within the updated SEA Environmental Report where necessary.</p>
<p>In its SEA South West Water state “SEA process has directly shaped the option development as environmental constraints and identified risks were used to amend infrastructure locations such as pipeline routes and intake locations, thus avoiding sensitive areas and reducing the need for mitigation”.</p> <p>However, the company has not provided clarity on the content of the WRMP and timings of its actions.</p>	<p>Section 8.4 of Revision F of the SEA Environmental Report details how intra-project cumulative effects were considered. Section 8.4.7 states 'In the case that further negative effects are identified, additional mitigation measures have been investigated, or alternative options explored in further detail in order to minimise any affects associated with the WRMP24'.</p> <p>Section 10.6 of the SEA Environmental Report demonstrates how the SEA has informed the draft WRMP in a number of ways, including collaboration meetings with engineering teams, and feeding information back to SWW for option refinement. Furthermore, results from the environmental assessments were fed into the SWW modelling under the</p>

	<p>environmental element and therefore directly fed into plan selection. This is detailed within Section 10.6 of the Environmental Report.</p> <p>Regarding timing of options, SWW are further developing supply options programmes of works and the associated studies to confirm sustainable abstraction levels, which may revise the timing of these studies. We will clarify in the SEA Environmental Report how the SEA and cumulative effects assessment has influenced the plan.</p>
<p>Mitigation proposals are outlined in Chapter 12 on a plan level. These are very high level and generic in nature, with several of these measures focussed on the construction stage. The mitigation hierarchy is not referred to. It has been identified that there are long term negative operational effects across 11 SEA objectives and a major negative effect during the construction phase in relation to carbon emissions but not clear how these will be mitigated for.</p>	<p>In the February 2023 consultation version of the SEA Environmental Report (rev F), monitoring and mitigation is set out in Chapter 11. The options have undergone further engineering development and environmental assessment since that time for the drWRMP24, and additional option-specific mitigation is now detailed in the environmental assessments and SEA.</p> <p>The SEA Environmental Report will also be updated to include reference the mitigation hierarchy as per the comment. We will also seek to demonstrate where these mitigation measures have informed the implementation of the plan.</p>
<p>Table 12.1 of the SEA sets out the monitoring measures to be implemented. However, there is very little detail on what the monitoring entails, its frequency and how the results will be used to inform future changes to the plan.</p>	<p>It has been acknowledged that further detail is required on SEA monitoring and Chapter 11 of the SEA Environmental Report will be updated to reflect this.</p> <p>We have taken note of the specific further detail required including how the monitoring will be undertaken, potential thresholds for remedial action and commitments to deliver remedial action should these be required.</p>
<p>In its SEA, South West Water state <i>“The initial Level 2 assessment identified that the scheme presents potential short-term and long-term negative effects in terms of WFD non-compliance to the Stour (Middle) and Stour (Lower) water bodies for both fish, certain chemicals and macrophytes and phytobenthos combined”</i>. The SEA does not provide assurances that, whilst the river Stour is not designated, that the impacts will be addressed.</p>	<p>This comment relates to the Poole Effluent Recycling & Transfer Scheme SRO. The information in the Environmental Report is a summary of the available SRO assessments at the time of writing. The SROs have since undergone further assessment, and therefore this will be reflected in the updated SEA Environmental Report where available.</p>
<p>The river Erme intake relocation option would have benefits not recognised in the SEA. The current abstraction point is within the Dartmoor SAC and does not protect CSMG flow targets and the fish pass does not meet best practice.</p> <p>The river Yealm intake relocation would have fisheries benefits which have not been recognised in the SEA. The current abstraction point has a 2m barrier for fish passage, within the Dartmoor SAC, which has been the subject of a AMP7 WINEP investigation. The existing licence is also on PR24 WINEP for an investigation as the current conditions do not protect CSMG flow targets. Therefore, as long as the new abstraction point was sustainable then there are significant benefits from this option.</p>	<p>It is acknowledged that there may be benefits associated with the River Erme and River Yealm intake relocations. The SEA assessments have been updated to reflect this.</p> <p>It has been noted that it will be important to be precautionary when classifying significance of any benefit, as further ecological and hydrological assessment is required for these options (as noted in the HRA and WFD assessments).</p> <p>The BVP is being reviewed and updated during Summer 2023, so these benefits will be reflected in subsequent updates to the SEA assessments.</p>
<p>In its recommended plan, the company includes a SEA summary. In this summary the company summarises the below:</p>	<p>The detailed WFD assessments include discussion of flow implications, and the SEA assessment matrices also include consideration of reduced flows and the associated</p>

<ul style="list-style-type: none"> · Roadford – water objective 2.1 may be affected as abstraction may result in water quality deterioration. However, the company does not appear to outline that there may be direct impacts as a result of reduced flow, as well as the indirect impact on water quality · Colliford – The company outline that the plan has potential significant effects on groundwater levels and hydrological connections to designated sites. The company does not appear to consider the impacts on flow. 	<p>water quality and direct ecological impacts. The SEA Environmental Report will be updated so that this is more clearly reflected in the summary sections for the plan-level assessments.</p>
<p>As part of its SEA, South West Water have not identified what the short-term impacts on biodiversity and archaeology would be. The company also have not provided information on how it would rectify these impacts.</p>	<p>As per the SEA Framework in Section 7 of the Environmental Report, Biodiversity, Flora and Fauna is assessed in under Objectives 1.1, 1.2 and 1.3. Archaeology is assessed in Objective 6. For every objective short and long term effects are assessed. This includes assessment of the short-term impacts on biodiversity and archaeology.</p> <p>Where effects are considered likely, mitigation measures are provided to reduce or avoid adverse effects.</p> <p>Some of the SEA assessment matrices have now been updated where specific references to biodiversity and archaeology were not made clear within the narrative.</p>
<ul style="list-style-type: none"> · As part of its WFD assessment, the company do not appear to have considered the risk from INNS. · The company does not outline whether the flows resulting from the options appraised support 'good' status · The company state that more detailed WFD assessments will follow with design developments. We support the need for more detailed assessments. However, it is unclear when these assessments will be done in the timeline of the plan. 	<p>INNS risk assessments are included in the WFD assessment. WFD and INNS assessments have been updated for the rdWRMP24.</p> <p>Waterbodies initially classified as High Status under WFD will be reclassified to Good Status if populations of 'High Impact' INNS (according to the current aquatic alien species list produced by WFD UKTAG) are introduced. Significant changes to water quality or flow could change INNS habitat suitability or dispersal, which could impact WFD biological status. These risks are beyond the scope of the INNS risk assessment tool commissioned by the EA but are assessed as part of the WFD assessments.</p> <p>If an option has the potential to lead to changes in river flows then this has been subject to a Level 2 detailed WFD assessment. These assessments look at the details of the changes in flow and whether these changes could lead to a change in the hydrological regime status element (a change from 'supports Good' to 'does not support Good'). Where there is insufficient information to make a clear assessment of this, a precautionary deterioration risk is raised, pending further investigation.</p> <p>SWW will be providing more information in the rdWRMP24 on timescales for option detailed design, supporting assessments and further studies.</p>
<p>In its SEA, South West Water have screened out surface water body from its level 2 assessment for option Ampress borehole development (BNW1). However, Table 3.1 acknowledges that more detailed work is required to prove no connection between confined aquifer and surface water body.</p>	<p>In the WFD assessment, no connection is considered to be present given abstraction is from the underlying confined aquifer. It is considered likely that there will be minimal effect on the surface water body. The option assessment is being updated to include</p>

	<p>further clarity on hydrological connections, and further Level 2 assessment if needed. The SEA will be updated accordingly if required.</p>
<p>In its plan, the company do provide a detailed monitoring plan. This includes a monitoring plan for:</p> <ul style="list-style-type: none"> · Cross catchment transfers - INNS monitoring and treatment · Moving effluent either up catchment or cross catchment – Eutrophication risk and relevant monitoring / Water quality deterioration impacts and treatment · Increasing abstraction – flow impacts and changes to flow regimes and so relevant monitoring. · Physical works – damage to environment requiring monitoring of impact and mitigation options. <p>The proposed mitigation for Clockhouse stream as a result of options Christchurch WWTW to River Avon and Christchurch WWTW transfer to Longham Lakes do not appear to be appropriate. The mitigation refers to river erosion control methods which does not seem relevant for the potential impacts of a loss of flow from the existing discharge point. We do not support a ‘shrink to fit’ approach to addressing abstraction pressures on a surface water body. Also, the existing discharge point is downstream of the confluence with the Avon in the inter-tidal reach not in the fluvial Clockhouse Stream itself.</p>	<p>As part of the production of the SEA Environmental Report and associated assessments, risks and mitigation were assessed using the data and information available at the time of writing. The monitoring plan is currently being updated with additional detail. Mitigation measures for the options noted will also be reviewed.</p>
<p>The Gatherley INNS risk assessment identifies a significant increase in transfer in the Tamar catchment by the operation of the new intake at Gatherley. The new pathway from the Tamar River system, including Tamar lakes, to Roadford will be opened with increased risks for the spread of invasives and potential exacerbation of poor water quality in the reservoirs and the river systems.</p> <p>Gatherley and Tamar Lakes abstractions are screened for INNS at 1 and 2mm screens. This will combat the spread of INNS to between 70 and 90 % of current known INNS species. This does not treat any water for cyanobacterial communities which can be spread around the catchment during licenced abstraction activities and Drought related emergency pumping regimes. The current proposal of 2mm screen was hypothetically tested by Apem. This highlighted that the proposal can be improved to further reduce the risk of invasive transfer. As the report acknowledges, many of the assumptions used in assessing the efficacy of the 2mm screen are untested. Managing the risk of spread of Invasive Non-Native Species through raw water transfers Position Statement April 2022 requires ‘no additional risk’ for new (Raw Water Transfer) RTW operations.</p> <p>Similarly, the company’s SEA outlines that the proposed pipeline from the Stour to Longham lakes poses a risk in relation to the transfer of INNS.</p>	<p>Further detail on mitigation is to be captured within the later stages of scheme design. Assumptions and exclusions explanatory text is to be updated within the next iteration of INNS assessment. Further information will be provided where available to ensure that suitable methods of reducing the risk of transferring damaging organisms across the Tamar catchment and effects of climate change are expanded upon. This will also be reflected in the SEA where appropriate.</p>
<p>In South West Water’s HRA, the company outline that the river Stour could be impacted by increased discharge of water and trade effluent from the Christchurch WWTW transfer to Longham Lakes option and the Mendip Quarry SRO. This could lead to</p>	<p>The potential for effects on the River Stour are mentioned in the HRA (SEA Environmental Report Annex H), but within the context of the river’s hydrological connectivity to Habitats Sites. The River Stour itself is not a Habitats Site and therefore</p>

<p>changes in water quality from turbidity and also impact on groundwater quality. However, with appropriate monitoring and mitigation in place, it is anticipated to result in neutral effects to the overall water quality and water resources. South West Water have not provided sufficient information in its plan to demonstrate it could achieve neutral effects.</p>	<p>this comment will be incorporated within related assessments, where applicable. Any adverse effects on the River Stour need to be confirmed through additional assessments and will be reflected in future iterations of the Environmental Report.</p>
<p>Chapter 13 is consisted of a number of reports and is in excess of 1500 pages long. Due to the way the document has been formed, the page numbers in the contents page are incorrect and due to the length of the document it is exceptionally difficult to find the information needed. Additionally, as part of its WRMP submission in January, South West Water provided an updated SEA Chapter. When the plan was published in February, the SEA document appears to be a different version. As an example, the February version does not contain all the L1 and L2 screening summary tables.</p>	<p>A partially updated version of the SEA Environmental Report (Revision E) was provided to EA in January 2023. the Environmental Report was then updated and finalised, and the revised version was published in February 2023 for consultation (Revision F). Both reports were the current version at the time of submission - this can be seen from ER Revision Record and dates at the start of the report. The correct version was published for consultation. The contents page had not been updated in the 'work-in-progress' version of the SEA Environmental Report provided in January 2023, and this was updated for the published consultation version (Revision F).</p>
<p>In the company's WRMP, there are a number of occasions where the company refer to other sections of its plan. However, on some occasions the references appear to have broken and these are now showing as referencing errors. These errors are in Chapter 10, Section 1.3.2 and there are around 44 in Chapter 13.</p>	<p>A partially updated version of the SEA Environmental Report (Revision E) was provided to the EA in January 2023. the Environmental Report was then updated and finalised, and the revised version was published in February 2023 for consultation (Revision F). The 'work-in-progress' report, provided in January 2023, was not fully complete and the referencing was therefore not updated at that point. This was subsequently updated in the February 2023 consultation version of the report.</p>

ID Reference: 050 Historic England	
Feedback	South West Water Response
<p>Site options and selection, heritage impact assessment 3.1 In drawing up and selecting specific schemes, water companies should be seeking not just to minimise harm to the significance of heritage assets and their settings, but to make a positive contribution to the historic environment where opportunities exist. In this regard, in relation to nationally significant infrastructure the NPS (paragraph 4.8.9) suggests considering measures to enhance the significance of heritage assets, and to address heritage assets that are at risk, amongst other things.</p>	<p>As part of the SEA, the WRMP options have been assessed against SEA Objective 6 (Historic Environment) "Conserve, protect and enhance the historic environment, including archaeology", which positively scores options which meet assessment questions including "Will the option enhance the significance of heritage assets including their settings?" (Table 7.2 of the SEA Environmental Report). See also the detailed SEA assessment matrices in Annex 6 of the Environmental Report, which contains recommendations for potential opportunities to enhance significance of heritage assets.</p>
<p>3.2 In order to achieve this, individual schemes should take opportunities to avoid adverse impacts on heritage assets through careful siting of new infrastructure and transfer pipelines. Enhancements to heritage assets, and improvements to public access and understanding, may also be achieved through conservation/restoration of existing</p>	<p>The assessment of potential positive impacts on the historic environment associated with the WRMP is captured within the SEA Framework (Objective 6 - Table 7.2 of the SEA Environmental Report). The SEA team have liaised closely with the option engineering teams to refine pipeline routes for options. See also detailed assessment</p>

<p>water related infrastructure such as historic canals. In this way heritage has the potential to attract positive scores within the best value framework.</p>	<p>matrices in SEA Environmental Report Annex 6, which contains recommendations for potential opportunities to enhance significance of heritage assets.</p>
<p>3.3 At this stage, the assessment of historic environment impacts and benefits associated with specific options (whether in the SEA, or Gate papers associated with Strategic Resource Options) is generally high level/broad brush and therefore both inconclusive and difficult for Historic England to validate. In determining which options should be taken forward into final plans, we therefore urge South West Water to give fuller consideration to the potential for heritage impacts and enhancements.</p>	<p>The SEA is a strategic assessment therefore, due to the early stage of option development, the SEA option assessments are based on publicly available heritage data. Baseline site surveys and associated data are not available at this stage. Project-level detailed site assessments would take place in future, when option detailed design is taken forward. This would be in conjunction with engagement with Historic England and other key stakeholders.</p>
<p>3.4 With this in mind, South West Water should be aware that paragraph 2.5.7 of the NPS states that: 'Any option included in a final water resources management plan will need to consider feasibility and reliability as well as taking account of potential environmental and social impacts'. We believe that more needs to be done by South West Water to meet this requirement in relation to the historic environment. By doing so, the water company can help to ensure that preferred options are deliverable and will not encounter unexpected obstacles during later consenting processes.</p>	<p>The WRMP options have been assessed against SEA Objective 6 (Historic Environment) "Conserve, protect and enhance the historic environment, including archaeology", based on the level of detail available for the options at this strategic stage. Options will be developed further in future and will undergo more detailed project-level studies. SWW are undertaking modelling utilising the outputs from the SEA to ensure all environmental and social sustainability objectives are taken into consideration during selection of the preferred options, including SEA Objective 6 (Historic Environment).</p>
<p>3.5 We note that South West Water has committed to further engineering and environmental studies to inform the final plan, and we hope that this will include robust consideration of heritage. Historic England has produced guidance on The Historic Environment and Site Allocations in Local Plans, which sets out a suggested approach to site selection that takes account of the historic environment. In appropriate cases, we request that heritage impact assessment of specific proposals is carried out, following industry guidance such as that produced by Historic England. In doing so, in order to take account of unrecorded and non-designated archaeology, the relevant Historic Environment Record should be referred to, and the views of local authority archaeological advisers sought. Heritage impact assessment should also follow a recognised approach to the assessment of setting and views, such as Historic England's GPA3: The Setting of Heritage Assets.</p>	<p>A summary of mitigation measures is outlined within Chapter 11 of the SEA Environmental Report and includes high level recommendations for additional assessments on the historic environment. Further mitigation for individual option assessments is provided in the detailed matrices within Annex 6 of the SEA Environmental Report. Additional baseline collection and assessment will be undertaken at a more detailed stage of option design.</p> <p>We will include reference to Historic England's guidance on The Historic Environment and Site Allocations in Local Plans. Additionally, where required, Heritage Impact Assessment will be identified as future recommendations and mitigation.</p>
<p>5 Response to specific project proposals</p> <p>5.1 Historic England welcomes the commitment of South West Water to pursue a strategy of progressive leakage reduction and demand management alongside options for new or improved supply-side infrastructure, as part of best value planning. This recognises that supply-side projects will sometimes involve major infrastructure proposals with potentially major impacts on the environment including heritage.</p> <p>5.2 Within the dWRMP24, 13 preferred supply-side options are selected within the best value plan. An additional 8 options are identified that could be brought forward as part of a worst case / adaptive strategy.</p> <p>5.3 Within the Plan itself, very little information is provided about the nature and location</p>	<p>We have provided information on all the schemes where there is certainty that they will be progressed. Further information will be provided for other schemes as these are developed and we have more certainty on what this will involve.</p>

<p>of these schemes. We note that in Appendix 8.1 there is some additional site-specific information. However, there remains considerable uncertainty for stakeholders on the location and nature of proposals. Consequently, it is difficult for Historic England to comment on specific proposals or to validate the findings of the SEA in relation to the heritage impacts of supply-side options.</p>	
<p>5.4 The same can be said for the Strategic Resource Options (SROs) which are being progressed by the West Country Water Resources Group. While we recognise that these are being progressed in parallel through the RAPID/Ofwat gated process, it is nevertheless important that there is accountability in relation to their selection for inclusion in Plans (which currently varies between the West Country water companies). As we have highlighted earlier in our response, paragraph 2.5.7 of the NPS states that 'Any option included in a final water resources management plan will need to consider feasibility and reliability as well as taking account of potential environmental and social impacts'. It is therefore important that options are transparent, are subject to a heritage impact assessment at the plan making stage, that proper consultation is carried out on these options, and that this informs the selection of sites to go forward to the final published plan.</p> <p>5.5 Notwithstanding the present difficulty in understanding and assessing individual schemes, we wish to highlight a number of specific supply options (of those selected within the best value plan or adaptive strategy) with which we have early concerns about either the substantive impacts or lack of information on proposals. These should not be taken as exhaustive comments on the options. While comments draw on information in SEA Annex 6, they also should not be taken as reflecting our agreement with the assessment of impacts at this stage.</p>	<p>The next updates to the SEA Environmental Report (autumn 2023) will encompass strategic summaries for each of the SRO options captured under the WRMP24. Further consideration will be taken of the SROs during the cumulative assessment of preferred and alternative plans, using the most recently available SRO assessment information.</p>
<ul style="list-style-type: none"> • COL2 Colliford Reservoir Storage Stage 2 - Lower River Camel Abstraction. A map showing the location of new infrastructure including pipeline is needed to better understand the impacts of this proposal. Within the SEA, the type and number of heritage impacts described seems inconsistent with the assessment of 'neutral' heritage impacts in both the short and long term. We are particularly concerned to note reference to direct encroachment on Lanhydrock Grade II* Registered Historic Park and Garden and [Battle of Lostwithiel?] Registered Battlefield. A more robust assessment of heritage impacts (including impacts on setting) will be required. It is also advisable that the water company contacts National Trust as a likely landowner to understand any potential implications of 'inalienable land'. We note that the potential for adverse effects on water dependant heritage assets or paleoenvironmental remains has been identified and a commitment made to collection and assessment of additional baseline information. 	<p>Comment noted - COL2 SEA assessment to be reviewed and updated where required. Landowner engagement is currently not anticipated to be undertaken at this stage due to the strategic nature of the plan, this will be considered during-further development of the options. Collection of additional baseline data will take place on a site-by-site basis when options have been developed further.</p>

<ul style="list-style-type: none"> COL11 Abstraction from Hawk's Tor Pit. The northern part of Hawk's Tor Pit falls within Hawkstor Pit SSSI – an important palynological site for interpreting Late Quaternary environmental history in upland south-west England. It is therefore of concern that the SEA has overlooked this feature, noting instead that 'Due to the option consisting of water transfer there is a very low potential of adverse effects upon groundwater dependent assets or paleoenvironmental remains'. Further information will be required to understand the potential impacts on this historic resource. If heritage assets are waterlogged, then changes in water levels or quality may impact on their preservation. 	<p>Comment noted - Hawk's Tor Pit SSSI has been assessed under Biodiversity objective 1.2 (see Annex 6). The SEA option assessment is to be updated to include this aspect within the Historic Environment Objective (6) in line with the comment.</p> <p>Due to the strategic nature of the SEAs, the collection of additional baseline data is not anticipated to take place at this time. Future recommendations for site surveys will be included, and undertaken during option development where required.</p>
<ul style="list-style-type: none"> WIM8 Bramford Speke is also an area of known paleoenvironmental interest¹ and additional baseline data collection and assessment as recommended by the SEA would therefore be beneficial. 	<p>Comment noted - WIM8 SEA option assessment to be updated to address comment. Due to the strategic nature of the SEAs, the collection of additional baseline data is not anticipated to take place at this time. Future recommendations for site surveys will be included, and undertaken during option development where required.</p>
<ul style="list-style-type: none"> BNW7 Mendip Quarries SRO – including intake on the River Avon to recharge the quarry, and subsequent raw water transfer to the River Stour. The SEA Annex does not assess this proposal in detail, while the main SEA report suggests that 'In relation to historic environment and landscape, the creation of Mendips Reservoir is likely to improve the visual amenity and setting of the current landscape from the existing quarry'. We therefore wish to highlight that there is potential for significant heritage impacts associated with this proposal (including impacts of pipelines on archaeology), either within the Mendip Hills, River Avon catchment, Bath springs World Heritage Site or other areas. While we welcome an initial approach to Historic England for advice in relation to this SRO, more detailed site-specific information is required, particularly in relation to the routing of any pipelines. 	<p>Option BNW7 is an SRO which has therefore been through a separate assessment process to the WRMP24 supply and demand options.</p> <p>A high level summary of the SROs (BNW7) RAPID Gate 2 submission SEA findings will be included within the WRMP24 SEA Environmental Report update where available.</p>
<ul style="list-style-type: none"> BNW8 Poole Harbour SRO – final effluent reuse scheme. While the SEA Annex does not assess this site in detail, it should be noted that the Wessex Water dWRMP24 assessed this proposal as having significant negative effects, reporting construction related impacts on a large number of designated heritage assets. While we hope that mitigation measures (once specified and applied in detail) may go some way to resolving these issues, further information is needed on the location and nature of associated infrastructure. The Historic Environment Record shows significant archaeological potential in the Poole area including a Roman Road extending between Poole and Wimborne Minster, and Roman pottery workings close to Poole Bay. We therefore support the recommendations within the SRO Gate 2 submission that full Heritage desk-based assessment, geophysical surveys at areas of archaeological potential along the pipeline route, evaluation trenching and geophysical survey are carried out within the activities leading to Gate 3 (commencing early 2023). 	<p>Option BNW8 is an SRO which has therefore been through a separate assessment process to the WRMP24 supply and demand options.</p> <p>A high level summary of the SROs (BNW8) RAPID Gate 2 submission SEA findings will be included within the WRMP24 SEA Environmental Report update where available.</p>
<ul style="list-style-type: none"> BNW11 Christchurch WWTW IPR 2 - Transfer to Longham Lakes. Further information is needed about this proposal and its potential impacts. The SEA heritage assessment 	<p>BNW11 is no longer included within the WRMP24.</p>

<p>gives mixed messages, making an overall assessment of moderate negative impacts during construction only, but referring to a large number of potential impacts within the SEA Annex. It is not entirely clear at present whether construction works would break new ground or would fall entirely within the footprint of existing infrastructure. Works in Christchurch have the potential to encounter archaeological remains due to considerable historic use and development in the area.</p>	
<ul style="list-style-type: none"> • COL9 New reservoir at Leswidden Pool and transfer to Drift Reservoir. More information is needed on this proposal which is located partly within Cornwall and West Devon Mining Landscape World Heritage Site. World Heritage Sites are the highest level of heritage designation indicating international importance. 	<p>The SEA option matrices refers to Balleswidden Pool being located directly within the Cornwall and West Devon Mining Landscape World Heritage Site. Further review and consideration will be taken to highlight international importance and where required the COL9 assessment will be updated.</p>
<p>6 Strategic Environmental Assessment (SEA) 6.1 Historic England commented on the SEA Scoping report in 2022 and we note that changes have been made to the assessment approach and are set out in SEA Annex 1.F. Please note that where the early engagement of Consultation Bodies is referred to in section 4.2 of the main dWRMP24, the correct name for the organisation is 'Historic England'.</p>	<p>The updates to the SEA Environmental Report will ensure the correct organisation name as stated will be used throughout.</p>
<p>6.3 We are pleased to note explicit reference in both the South West Water dWRMP and the SEA (8.7) to the findings of the SEA being used to inform decision making around options and the best-value plan. While we remain of the view that the historic environment should be incorporated explicitly into plan objectives and metrics, this nevertheless suggests that there is some linkage and accountability between the assessment of impacts – including heritage impacts – and the overarching plan-making process. Paragraph 10.6.2 of the SEA refers to the way in which the SEA has informed options, stating that infrastructure locations, pipeline routes and intake locations have been amended 'thus avoiding sensitive areas and reducing the need for mitigation'. However, as a number of preferred options are nonetheless assessed by the SEA (Annex 6) as 'directly encroaching' on heritage assets, it is unclear whether these impacts are now considered unavoidable or whether infrastructure/pipeline routes are subject to further adjustment?</p>	<p>Infrastructure and pipeline routes are subject to further adjustment as options are in the early stages of development where there is current scope for refinement. Further baseline data via site specific investigations/assessments will further inform the development of the options, to minimise likely adverse impacts such as those regarding the historic environment. The SEA is strategic and where there is mitigation to avoid direct impacts on historic assets for example, this has been taken into account to inform the post-mitigation residual effects reported in the Environmental Report (SEA assessment criteria outlined in detail within Environmental Report Annex 1, Appendix E).</p>
<p>6.4 We also welcome the inclusion of the historic environment within the SEA objectives (Table 7.1) and guide questions (Table 7.2). 6.5 In relation to the assessment of the heritage impacts of specific proposals (Chapter 9 onwards), this is both high level and selective. This is helpfully expanded on, to some extent, by the more detailed content in Annex 6. This reveals a somewhat variable approach to the assessment of heritage impacts for different sites/proposals. It is not clear to what extent the approach has been informed by an understanding of the significance of the heritage assets affected – a key concept in heritage policy and decision making. For further guidance please refer to Historic England's GPA2: Managing Significance in Decision Taking.</p>	<p>Section 8.4.7 of the SEA Environmental report outlines the following: "<i>Professional judgement, following the SEA framework, is used to determine the significance of effects identified. A narrative explaining the significance of effects accompanies the score. In the case that further negative effects are identified, additional mitigation measures have been investigated, or alternative options explored in further detail in order to minimise any affects associated with the WRMP24.</i>" The SEA assessment criteria outlined in detail within the SEA Environmental Report Annex 1, Appendix E, provides the high-level assessment strategy in relation to the significance of heritage assets and potential associated risk.</p>

6.6 The assessment approach appears to rely on buffer zones as the main way of identifying potentially impacted heritage assets. While this is understandable bearing in mind the large number of proposals being assessed, it is important that assessors are aware that buffers will not provide an appropriate means of assessing impacts on the settings of heritage assets, where in some circumstances a view can be impacted over a considerable distance. This requires a more nuanced and contextual approach. Further guidance can be found in Historic England's GPA3: The Setting of Heritage Assets.

6.7 Next, while it is common for development impacts to be identified as relating to 'construction' or to 'operation', in the former case it must be recognised that heritage impacts relating to construction cannot always be treated as temporary/short term. For example, the direct physical impact (or 'direct encroachment' as referred to in this SEA) of a pipeline on buried archaeology during construction is likely to be permanent and irreversible. In the case of setting impacts resulting from construction activities, while it may be more common for these to be temporary, certain impacts such as the loss of mature trees to allow for installation of a pipeline, may also result in setting impacts that persist for some decades. We advise that the SEA assessment of options/proposals should be revised to reflect this distinction.

6.8 This is particularly relevant in relation to lengthy pipeline transfers which are likely to encounter Scheduled Monuments and other archaeological remains. It is important that South West Water is aware that any works that would pass through scheduled areas would, under the 1979 Ancient Monuments and Archaeological Areas Act, require Scheduled Monument Consent and there is no guarantee DCMS would grant this. Water companies should seek to route any pipelines or other infrastructure outside of Scheduled Monument boundaries; typically we would recommend that a reasonable buffer is allowed, subject to the results of further archaeological investigation.

6.9 A related point is that, within the assessment of heritage impacts, limited consideration has been given to unknown and non-designated heritage assets. Where non-designated archaeology is found that is of equivalent significance to a Scheduled Monument, both NPPF footnote 68 and paragraph 4.8.5 of the NPS provide the same level of policy protection to that archaeology as to a designated heritage asset. The likelihood of archaeological finds may be greater within the settings of known heritage assets (such as Lostwithiel Battlefield) and in monument rich landscapes such as Bodmin Moor.

6.10 The assessment of long term / operational impacts on the historic environment as a result of changes to the water environment, water quality and chemistry (in particular the impact of increased or reduced abstractions) is also largely absent from the SEA at present. Consequently, while there are some references to potential impacts on water dependent heritage assets or paleoenvironmental remains, these are generally recorded as 'neutral' due to lack of information. Within Annex 6, for a number of schemes it is stated that additional work will be undertaken in relation to

The assessment of effects are not solely distance based, however distance thresholds were used as starting points. Effects have been determined based on the level of detail available at this stage. Further studies and engagement with Historic England will take place as options develop further.

The SEA assessments will be reviewed to ensure the commentary appropriately draws out the long-term effects of construction activity.

Gaining consent for the proposed options and other planning activities related to ensuring the protection of historic assets will be initiated where required when site, construction and operation details have been further progressed.

The potential for encountering previously unknown archaeology and the impacts on water dependent heritage assets was included in the SEA assessments. The assessment commentary will be reviewed to clarify this.

The assessments will also be further expanded to address the likelihood of previously unknown archaeological finds within the types of locations noted.

Where applicable, the Historic England guidance on the Tiered Assessment approach will be included with future recommended further studies and mitigation.

<p>water dependent heritage assets and water sensitive historic environments. Where relevant, Historic England guidance recommends a Tiered Assessment approach which can be found in Preserving Archaeological Remains: Appendix 3 Water Environment Assessment Techniques (2016). This forms an appendix to Historic England’s advice note on Preserving Archaeological Remains.</p>	
<p>6.11 In relation to mitigation, we welcome the fact that the SEA gives some attention to this on a site by site basis. However, the approach is fairly high level/general (e.g. ‘implement best practice mitigation measures’). This leaves a high level of uncertainty about what mitigation is required and whether this can be delivered. We would therefore welcome further information on mitigation measures where relevant, having regard to Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004, which indicates that Environmental Reports should include: ‘7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme’.</p> <p>6.12 We support the commitment within section 11.2 to monitoring of proposals. However, we are concerned that the monitoring measure ‘number of heritage assets adversely affected’ does not present a meaningful measure that would trigger specific positive action. The measure fails to distinguish between either the level of significance of an asset, or the severity of the impact on it and would therefore benefit from refinement.</p> <p>6.13 Regarding the assessment of impacts of specific schemes – please refer to our comments in section 5 of this response. For many of the proposals, we consider that further information is needed on the nature of the infrastructure proposed, and its location/footprint, including the routing of pipelines and extent of construction corridors. We recommend that heritage impact assessments are carried out for relevant proposals in advance of publication of the final WRMP, including for all SROs. These may both be informed by, and inform, the SEA. Where there are potential impacts on assets that fall within the statutory remit of Historic England, we would welcome further engagement to ensure that harm to the historic environment is minimised or mitigated, and that where possible opportunities are taken to secure enhancements.</p>	<p>The SEA is a strategic assessment of options identified within the WRMP24, utilising the information available at the time of writing. Further detailed design and site surveys are anticipated to be undertaken at a later stage.</p> <p>A summary of mitigation measures is outlined within Chapter 11 of the SEA Environmental Report and includes high level recommendations for additional assessments on the historic environment. Further mitigation for individual option assessments is provided in the detailed matrices within Annex 6 of the SEA Environmental Report. More tailored mitigation measures will become available when option designs are finalised and further assessments/studies are undertaken.</p> <p>The monitoring suggestion regarding historic asset numbers will be reviewed and further developed within the next iteration of the SEA Environmental Report.</p> <p>The undertaking of site specific studies such as heritage impact assessments will take place at a later stage where this information becomes available. Future engagement with Historic England will seek to develop these options further in line with their requirements.</p>
<p>Finally, we wish to request several minor adjustments to specific statements within the SEA report:</p> <ul style="list-style-type: none"> • Within the executive summary, and repeated elsewhere in the SEA report including 5.2.7 and the future baseline, there is a reference to the fact that Somerset is the only county within the South West Water region which does not have a heritage asset identified as being ‘at risk’. As the reason for this appears to primarily relate to the fact that only a small part of Somerset is located within the plan area (rather than that there is no heritage at risk in Somerset), we do feel this might be a misleading statement. We therefore suggest that it is either removed or qualified. 	<p>The updates to the SEA Environmental Report will ensure that the proportion of Somerset within the SWW region is clarified.</p> <p>It is noted that the extent of the SWW region is captured within Annex 1 Appendix D.</p>

<p>Please note a typographic error on p27 where 'Historic Environment' has been written instead of 'Historic England'.</p> <ul style="list-style-type: none"> • Within Table 6.1 (p42 Historic Environment) we believe that the following sentence may be an error? 'Explore opportunities to enhance the significance of heritage assets and their setting, for example through habitat creation'. • Please note that Table 9.3 of the SEA is not easily legible. • Within section 11.1 Mitigation and Enhancement Measures there is a statement that where heritage assets are impacted 'options should be placed as far away as possible from the asset'. However, the level impact on an assets setting does not relate to distance alone as infrastructure may be far away but impact on a key designed view (for example). We therefore suggest alternative text as follows 'should be placed to minimise direct impacts and impacts on setting'. • Also within section 11.1, we welcome the next statement which commits to consultation with statutory bodies, but suggests that the text is extended slightly to say 'according to statutory requirements, policies and guidance'. 	<p>The updates to the SEA Environmental Report will ensure that these suggestions are captured.</p>
<p>7 Proposals for the Isles of Scilly</p> <p>7.1 Chapter 14 of the dWRMP24 contains information on the context, supply demand balance and proposed best value plan for the Isles of Scilly. The area is described as 'seriously water stressed' with the intension to address this at least in part by delivering marine desalination in the immediate future (AMP7: 2020-25), and our understanding is that these proposals are therefore not being consulted on as part of the dWRMP24? Instead the dWRMP will deliver a continuation of existing metering, leakage and water efficiency strategies.</p> <p>7.2 This strategy seems to be based on the assumption that a number of schemes to intake and treat groundwater, brackish or sea water will be delivered by 2025. These include proposals for the islands of St Mary's, Bryer, Tresco, St Martins and St Agnes that are listed in Table 1 of Chapter 14.</p> <p>7.3 We recommend that early consideration is given to whether any of these would trigger the statutory requirement to consult Historic England at application stage. If this is the case then we recommend that South West Water gives consideration to whether it would be beneficial to seek preapplication advice from Historic England. We note that option ISMY1 records a positive effect on the historic environment in Table 9.3 and further information about the nature of this effect/enhancement would be helpful.</p>	<p>The Isles of Scilly options have subsequently been removed from the WRMP24.</p>
<p>8 Pipeline transfers not included in the dWRMP24</p> <p>9.1 Appendix 8.2 (Interconnector Options) outlines a number of options for new and enhanced pipeline networks, which do not appear in the dWRMP by merit of their not directly resulting in an increase in available water.</p> <p>9.2 Like any major pipeline works, there is potential for these options to result in significant impacts on heritage assets, in particular known and unknown archaeological</p>	<p>Pipeline transfer options are being developed and will be included and assessed within the next updates to the SEA Environmental Report. Future engagement with Historic England will seek to develop these options further in line with their requirements.</p>

remains. We therefore recommend early engagement with Historic England on any schemes that are likely to result in impacts on heritage assets where this falls within our statutory remit.

ID Reference: 067 Natural England

Feedback	South West Water Response
<p>In our review of South West Water’s dWRMP, Natural England has considered how the company has addressed its environmental obligations as set out in The Water Industry Strategic Environmental Requirements (WISER)2 and how the dWRMP supports the ambitions in Government’s recently published Environmental Improvement Plan (previously the 25 Year Plan). Whilst we recognise the scale and complexity of the challenge in producing this dWRMP, Natural England are minded to object to South West Water’s dWRMP if it is not improved in line with our representation before it is published. As submitted, we consider it will: have an adverse effect on the integrity of the River Avon and River Camel Special Areas of Conservation (SAC)</p>	<p>This comment has been acknowledged and conversations with NE are ongoing regarding the level of detail the HRA can provide at this stage and why potential effects on designated sites cannot be ruled out on a precautionary basis in some cases. Additional assessments such as on-site studies and hydrological modelling are required to fully confirm the extent of impacts and appropriate mitigation for some options.</p>
<p>Furthermore, Natural England consider that the dWRMP has insufficient information to determine impacts on Dartmoor SAC, Fal and Helford SAC, Isles of Scilly Complex SAC, Plymouth Sounds and Estuaries SAC, Tamar Estuaries Complex Special Protection Area (SPA), Isles of Scilly Marine Conservation Zones (MCZs), and Penwith Moors, River Barle, Lower Moors, Great Pool and Higher Moors & Porth Hellick Pool, Tamar-Tavy Estuaries Sites of Special Scientific Interest (SSSI). As submitted, the plan could have potential significant effects on these designated sites.</p>	<p>This comment has been acknowledged and conversations with NE are ongoing regarding the level of detail the HRA can provide at this stage and why potential effects on designated sites cannot be ruled out on a precautionary basis in some cases. Additional assessments such as on-site studies and hydrological modelling are required to fully confirm the extent of impacts and appropriate mitigation for some options.</p>
<p>We note discrepancies in option description, with detail differing between environmental reports. Additionally, impacts to marine features and Marine Conservation Zones (MCZs) do not appear to have been considered in environmental assessments.</p>	<p>Option descriptions between the Environmental Assessment reports will be made consistent for the next iteration of the draft WRMP.</p> <p>Marine Conservation Zones and Marine Protected Areas were considered within the SEA assessment, and are included in the SEA guide questions, as set out in Table 7.2 of the SEA Environmental Report.</p>
<p>Annex 1 - Natural England’s advice on South West Water’s draft Water Resources Management Plan (dWRMP) 2022 The legislative and policy context for Natural England’s advice is set out in Annex 2 to this letter. Natural England has assessed how the plan has demonstrated compliance with these legislative and policy requirements, including, where Natural England is not a statutory regulator, our views on the level of ambition shown in the plan and the timescales proposed in relation to nature recovery and resilience. The dWRMP has also been reviewed in relation to the Environmental Destination set out within it, and whether that scenario is sufficient to meet these legislative and policy requirements. In particular, where the Plan relies only upon the Environment Agency’s minimum requirement of “Business as Usual plus” (BAU+), Water Companies should ensure that their WRMP includes a pathway to meet all their</p>	<p>The introductory commentary providing context to the NE representation on SWW’s draft WRMP is gratefully received.</p>

<p>environmental assessment and nature recovery obligations in line with duties and timetables in Annex 2.</p>	
<p>1.1 Habitats Regulations Assessment (HRA) Water Companies have a statutory duty to prepare Water Resource Management Plans (WRMPs) and are the Competent Authority for Habitats Regulations Assessment (HRA) of the draft WRMP. Natural England has reviewed the HRA submitted with this dWRMP alongside other parts of the draft WRMP, and wishes to provide the following advice: In Natural England's view, South West Water's draft Water Resources Management Plan (dWRMP) should be amended to meet the Company's obligations in so far as they are relevant to the supply - demand balance set out in the dWRMP. Natural England are minded to object to the South West Water dWRMP if it is not improved in line with our representation before it is published. As submitted, we consider it will have an adverse effect on the integrity of the River Avon SAC and River Camel SAC</p>	<p>This comment has been acknowledged and conversations with NE are ongoing regarding the level of detail the HRA can provide at this stage and why potential effects on designated sites cannot be ruled out on a precautionary basis in some cases. Additional assessments such as on-site studies and hydrological modelling are required to fully confirm the extent of impacts and appropriate mitigation for some options. Further work is ongoing and will continue at a project-level to fully determine environmental effects on designated sites.</p>
<p>The amendments should include:</p> <ul style="list-style-type: none"> • An assessment of the effect of the increase in demand for abstraction that is likely to arise from growth, including new development. 	<p>It has been acknowledged that the effect of the increase in demand for abstraction should be assessed, however this information is not readily available at present. SWW will undertake further assessment/monitoring as options progress.</p>
<ul style="list-style-type: none"> • An assessment of the existing adverse effects on the River Avon SAC and River Camel SAC caused by abstraction under current licences, and the role which these may play in preventing the site from achieving its conservation objectives for flow and physical river habitat (which support the riverine SAC habitat and fish species). To be clear the assessment should address flow requirements for meeting the River Avon and River Camel Conservation Objectives⁵ and include consideration of available abstraction on naturalised flows that are dramatic (i.e. significantly greater than the deviations allowed for by the conservation objectives for flow) and the impact of available abstraction on meeting the site's conservation objectives in periods of environmental drought/low flow (<Q95) conditions⁶. The assessment should cover the whole length of the river SAC relevant to impacts from abstraction (not only the WFD lower waterbodies as considered in the draft WRMP). It should also cover the effect of abstraction in conjunction with physical modification and management intervention required on the river channel to enable that abstraction, notably in relation to meeting the site's conservation objectives concerning the structure, functioning, and supporting processes for the interest features. 	<p>This information is not currently readily available at this stage of option development. SWW will undertake further assessment at the project level and engage with NE as options are further developed. This requirement will be included within further assessment/monitoring sections of the SEA Environmental Report to acknowledge the requirement for a project-level HRA for certain options.</p>
<ul style="list-style-type: none"> • An explanation of how an increase in abstraction from the River Avon SAC and River Camel SAC will be prevented, clearly identifying the mechanisms and options to secure this, so that it can be relied upon with certainty. 	<p>An increase in the abstraction from the River Avon SAC and River Camel SAC would not be prevented if certain options are progressed. Other measures along the watercourse would be required, which would require further study than the HRA can provide with the current level of detail at this stage.</p>

<p>An explanation of the measures that will be put in place to compensate for continued volumes of abstraction from the River Avon SAC and River Camel SAC to the planning horizon for the WRMP if, after mitigation, adverse effects remain and there are no alternatives to this abstraction that would remove the impact on the integrity of the site. Compensation will be required if the alternatives can only remove the adverse effect over very long, possibly multidecadal, timescales.</p>	<p>If adverse effects remain after mitigation at HRA Stage 2, further measures would need to be put in place to ensure the integrity of the site is not compromised. These detailed measures cannot be provided at the plan level and would require further assessment and engagement with NE as options are developed.</p>
<p>1.1.2 Formatting Comments Natural England notes the production of the informal HRA of the dWRMP. We have some comments relating the readability and formatting of the document that we hope will aid in the production of the final, formal HRA.</p>	<p>All comments relating to formatting have been noted and will be addressed in the next iteration.</p>
<p>We welcome section 2.2, which briefly summarises each option, and makes for a useful crib sheet when referring to the plan/HRA. We do however find that the sole use of the code for each option (ROA14) without the accompanying option name (ROA14 – Raise Avon Dam) makes it difficult to remember which code refers to which option. We recommend that both the code and option name is referred to throughout the document, including in the contents page of the HRA, to make navigating the report easier.</p>	<p>It has been acknowledged that using option codes rather than the full description may make it difficult to interpret which option is being referenced. Appropriate names will be included within the next iteration of the SEA Environmental Report and associated appendices to enhance readability.</p>
<p>We also advise that the HRA, and indeed the other assessment reports appended to Chapter 13, are separated into distinct, standalone documents. It is difficult to navigate through each document when they're presented as one file – for example the page numbers relate to the individual reports and not the appendix as a whole.</p>	<p>We acknowledge that the SEA Environmental Report Annexes may be difficult to navigate and will seek to publish the next iteration of the Environmental Report and associated assessments in the most accessible way.</p>
<p>Maps should be provided within the HRA, demonstrating the location of the assessed options in relation to Protected Sites. These maps should be clear and easy to interpret, therefore we recommend confining these to individual options, or at largest, WRZ scale.</p>	<p>Appendix D provides the baseline of ecological sites in the SWW region. Detail of the relevant sites in screened into the HRA assessment is provided within Annex 1, Appendix H - HRA Assessment. Maps can be provided in the next iteration of the HRA.</p>
<p>1.1.3 Formal Assessment and In-Combination The development of the dWRMP should have an appropriate formal statutory HRA that demonstrates how the plan complies with the legislative requirements for environmental assessment set out in Annex 2 to this report. The HRA clearly outlines itself as an informal document, crucially stating that “...none of the options currently have enough associated information to conduct an appropriate Stage 1 screening...” (HRA, Statement 3.3.2) Though we recognise that the dWRMP identifies the informality of the HRA in Chapter 4 this is not compliant with the WRMP guidance and legislative obligations as set out in Annex 2.</p>	<p>The formal plan-level HRA will be the final report in Autumn 2023. HRA screening and Appropriate Assessment has been carried out for all options, which have been undertaken to the extent that currently available information allows. At this stage, there may still be insufficient information at a project-level for each option, where further assessment such as on-site studies or hydrological modelling is required to confirm the extent of effects. On a precautionary basis, the potential for adverse effects remains noted in the HRA as these cannot be conclusively ruled out for some options at this stage. The requirement for future monitoring/assessments to fully confirm adverse effects, with associated updates of the HRA and engagement with NE, will be detailed in the SEA Environmental Report.</p>
<p>The HRA attempts to carry out an in-combination assessment for the 11 Preferred Plan options identified in Table 2-1. Chapter 4.3.2 of the dWRMP states that “The HRA concluded that there will be no in-combination effects on Habitats Sites as a result of this plan”. Whilst this chapter does then go on to say this is indicative only, we advise</p>	<p>SWW will provide a full in-combination assessment in the revised version of the HRA in Autumn 2023.</p>

<p>that there is not sufficient information provided to inform this decision. The HRA notes that an in-combination assessment has not been carried out for Least-Cost or Worst-Case plans (HRA, pg19). Natural England advises that all options should undergo an in combination assessment, particularly where these options make up the Adaptive Strategy and have a likelihood of being deployed.</p>	
<p>The HRA states that the indicative in-combination assessments that have been carried out for the Preferred Plan options only consider “possible interactions between preferred plan options and do[es] not account for other operational schemes or submitted planning applications within the respective WRZs” (HRA Pg 20) For clarity, Natural England advises that a full, cumulative and in-combination assessment should include an assessment of the impacts from any option and should include existing licenses where these are material to the assessment of likely significant effect.</p>	<p>SWW will provide a full in-combination assessment in the revised version of the HRA in Autumn 2023.</p>
<p>A ‘down the line’ approach has been taken by South West Water to assessing a number of options, including in-combination assessments. The criteria for which we consider this approach to be acceptable is outlined in Annex 2. Natural England does not consider these criteria have been fulfilled and recommend South West Water undertake a plan level full assessment of all options included in the preferred plan, including a comprehensive in-combination assessment, to illustrate that the planned approach will not have an adverse impact on integrity of any Habitat Sites. A commitment should be made in the final plan to pursue alternatives if an adverse effect on integrity of a Habitat site cannot be avoided for the preferred options within the plan.</p>	<p>SWW will provide a full in-combination assessment in the revised version of the HRA in Autumn 2023.</p> <p>Where the potential for adverse effects cannot be currently ruled out in the HRA on a precautionary basis, these options will continue to undergo further assessment to fully understand the potential effects alongside engagement with NE.</p>
<p>Natural England supports the statement outlining the need for further assessments in SEA section 9.9.6, “Upon receipt of more detailed data, a revised HRA Stage 1 Screening is required, with progression to subsequent HRA stages if necessary.”, but these should be undertaken before the plan can be published. If adverse effects cannot be excluded on objective evidence options in the plan may need to be altered.</p>	<p>The HRA screening and AA has been updated as options have been developed to inform the revised draft plan. The statement "Upon receipt of more detailed data, a revised HRA Stage 1 Screening is required, with progression to subsequent HRA stages if necessary" has subsequently been removed from the revised HRA report, and any options where adverse effects cannot be excluded will be identified with the necessary approach.</p>
<p>1.1.4 Existing Licences Natural England advises that South West Water should ensure that the HRA of the dWRMP includes existing licences where a material change has occurred since the last HRA of that licence or/and the last dWRMP in line with the WRMP guidance and requirements set out in Annex 2 to this letter. The material change can include changes to the climate (e.g. drought impact), guidance, policy, legislation, conservation objectives or SACOs (Supplementary Advice to Conservation Objectives) or evidence of site deterioration/condition change or anything that is material to the determination of either likely significant effect or adverse effect on integrity. This includes cumulative effects and in combination effects.</p>	<p>This information is not currently readily available at this stage of the assessment. SWW will undertake further assessment/monitoring at the project level as options are further developed, alongside ongoing engagement with NE. This requirement will be included within further assessment/monitoring sections of the SEA Environmental Report to acknowledge the requirement for updated project-level HRA for certain options.</p>

<p>1.1.5 Best Practice Measures</p> <p>It is noted that 'Best Practice Measures' make up a considerable amount of the proposed mitigation strategies for those options that have undergone Appropriate Assessment (AA). Please see government guidance on appropriate assessments. They should be specific to the impacts of the development, and they should be made in the light of the site conservation objectives (See Annex 2, 2.1). The measures that mitigate the adverse effect should be certain and specific to the impacts which they are mitigating. It is unclear from the use of the none-specific term "best practice measures" how mitigation will meet the tests of certainty required in an appropriate assessment to avoid an adverse effect on integrity of the designated sites.</p>	<p>Updates to the reports in summer 2023 will expand upon 'best practice' mitigation measures during construction and provide more specific details where necessary.</p>
<p>1.1.6 Monitoring</p> <p>South West Water have not outlined any monitoring in their HRA, aside from the potential for otter camera traps. Natural England advise South West Water to produce a full monitoring plan for the environmental impacts of their dWRMP in line with legislative commitments (see Annex 2 in particular SEA requirements). The monitoring programme needs to be robust and adaptive in relation to their assets and operations which could impact upon Protected Sites. This should be completed before the final WRMP is published.</p>	<p>It has been acknowledged that further detail on monitoring is required within the HRA. Monitoring/further assessment sections are being updated for the next revision of the HRA in Autumn 2023. This will be specific to qualifying features of Habitats Sites, rather than a full monitoring programme.</p>
<p>1.1.7 Potential Additional Options</p> <p>It is anticipated that there are several additional options which may be included in the final WRMP that were not identified at the time of drafting, including the proposed Cornwall desalination options noted in Chapter 8 Annex C. We advise that the final HRA should include their assessment. Note that desalination can impact marine protected areas including those covered by the Habitats Regulations.</p>	<p>The final SEA Environmental Report and associated appendices will include all options which are proposed for the WRMP.</p> <p>At the time of response, all Isles of Scilly desalination options have been removed.</p> <p>It is acknowledged that if they are reinstated, or new options arise, marine elements will be considered.</p>
<p>1.1.8 Dartmoor Special Area of Conservation (SAC)</p> <p>The HRA notes Dartmoor SAC in the informal assessment for the following options:</p> <ul style="list-style-type: none"> ROA2 River Erme ROA3 River Yealm ROA7 Expansion of Northcombe WTW to 60Ml/d ROA8 Tottiford WTW – Reduce WTW minimum capacity ROA10 Avon WTW – Reduce WTW minimum capacity ROA11 Meldon WTW – Reduce WTW minimum capacity ROA14 Raise Avon Dam ROA16 Littlehempton WTW <p>We advise that impacts to Dartmoor SAC should be considered in the updated assessments of the following options:</p> <ul style="list-style-type: none"> ROA4 Abstraction of Roadford compensation flow at Gunnislake when making supply 	<p>Any additional information on ROA4 and ROA15 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where uncertainty remains. The additional impact pathways are being included in the updated (Autumn 2023) version of the report.</p>

<p>releases ROA15 Gatherley phase 2</p>	
<p>Please find below our comments relating to options with the potential to impact Dartmoor SAC, where we feel further assessment is required.</p> <p>1.1.8a ROA14 – Raise Avon Dam</p> <p>This option seeks to raise the level of Avon Dam by 2-4m (figures differ between environmental reports and summaries), increasing the size of the reservoir by 50m from the current reservoir edge. This option is not included as part of the Preferred or Adaptive plans; our following comments highlight deficiencies in the HRA process in relation to this option. The SEA of this option highlights the potential for both short and long term ‘Major Negative Impacts’ to biodiversity, flora and fauna due to potential for colonisation of invasive non-native species (INNS). The WFD Assessment demonstrated that further assessment would be necessary due to impacts from sedimentation and nutrient loading. Despite noting the potential for impact to Dartmoor SAC from pollution during construction, and the spread of INNS during operation, these long-term threats have not been recognised by the HRA process and therefore we cannot agree with the conclusion of the AA that there will be no adverse impacts as a result of the option. We understand that the HRA was completed in advance of the WFD/SEA reports, however the ‘Introduction of invasive species’, ‘Nutrient enrichment’ and ‘Changes in sedimentation/silting’ are all specified within the HRA criteria as a potential effect on Habitats sStes, therefore should have been considered. The option proposes to raise the water level of the reservoir, taking “an approximate area of 50m around the current footprint.” (HRA, pg149), bringing Dartmoor SAC within less than 500m of the asset. As noted in the SEA, this action may increase the spread of INNS within and upstream of the waterbody. We do not consider that at this stage best practise methods relating to INNS management are enough to secure a conclusion of no adverse effect.</p> <p>Furthermore, the HRA notes that due to the approximate 50m loss of area around the waterbody, the option “may result in the loss of terrestrial habitats which are suitable for otter resting places, such as priority grass moorland. This could have a significant effect of the SAC population and supporting habitat outside the site boundary.”</p> <p>Additionally, in reference to Otter, the HRA also notes that “Effects of displacement may be temporary or long-lasting and may result in redistribution within or from a site.”</p> <p>We do not therefore agree with the assertion of the AA that there will be no operational impacts to Otter.</p>	<p>Any additional information on ROA14 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where uncertainty remains.</p> <p>The additional impact pathways are being included in the updated (Autumn 2023) version of the report, to account for the findings of the WFD/INNS assessments, and provide consistency with the HRA.</p> <p>Operational impacts due to the loss of functionally linked habitats (otters) and the spread of INNS will be included accordingly.</p>
<p>1.1.8b ROA10 – Avon WTW – Reduce WTW minimum capacity. This option seeks to upgrade Avon WTW to allow for finer control of supply during times of lower demand and is included within the Adaptive Strategy. Whilst we welcome the upgrade to allow the WTW to run at a lower output, therefore conserving water resources, we disagree with the assertion within the screening that “The Bala Brook may support Atlantic</p>	<p>Any additional information on ROA10 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains.</p>

<p>salmon. However, as this watercourse and its headwaters are outside of the SAC boundary, it is unlikely that populations of Atlantic salmon here, if present, are those associated with the SAC.” (HRA Section 31) Our mapping demonstrates that the Bala Brook extends into the Dartmoor SAC boundary by approximately 500m. We recommend removing the reference to the Brook being outside of the SAC boundary.</p>	<p>Text referring to the Bala Brook and its connection to the Dartmoor SAC will be amended following the comment, and additional impact pathways considered.</p> <p>At the time of the original assessment, no information regarding the relationship between the WTW and the upstream reservoir was available. Additional description, where available, will be included to inform the assessment.</p>
<p>Natural England advise that it is not clear from the HRA what the effects of refining the capacity of the WTW will be. Whilst we understand that the infrastructure changes will be confined to the existing footprint of the WTW, what is not clear is what effect reducing the amount of water treated will have on the upstream reservoir. Will this result in increased water being stored within the reservoir? As with ROA14, will this then have the capacity to increase INNS risk and damage/destroy otter habitat? Whilst this may not be relevant, the lack of detail within the option description makes this difficult to determine, therefore Natural England are minded to object to the proposal on the grounds that insufficient information is available to determine impacts to Dartmoor SAC.</p>	<p>Any additional information on ROA10 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains.</p> <p>Text referring to the Bala Brook and its connection to the Dartmoor SAC will be amended following the comment, and additional impact pathways considered.</p> <p>At the time of the original assessment, no information regarding the relationship between the WTW and the upstream reservoir was available. Additional description, where available, will be included to inform the assessment.</p>
<p>1.1.8d ROA4 – Abstraction of Roadford compensation flow at Gunnislake when making supply releases. We agree with the conclusion of the HRA and AA for this option, in so far as it concerns Plymouth Sound and Estuaries SAC. There is insufficient evidence at this stage to conclude no adverse effect on integrity, however due to insufficient detail of the proposed scheme this option should be reassessed before the final WRMP, and not at this stage progressed to Stage 3.</p>	<p>Any additional information on ROA4 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains.</p> <p>Additional sites will be included within the revised assessment (Autumn 2023) where required.</p> <p>The in-combination assessment will be included within the final report in Autumn 2023; cumulative effects from changes to Gunnislake and other abstractions in the catchment will be included in the final version.</p>
<p>We do however advise as above that Dartmoor SAC should be screened into the HRA for this option, and that the report should be mindful of future potential changes to the asset at Gunnislake which may impact the efficacy of the option.</p>	<p>As above.</p>
<p>We also query whether this abstraction will be an increase to the existing license on the Tamar, and whether this has been assessed alongside the proposed abstraction(s) further upstream (River Lyd and/or River Tamar)</p>	<p>As above.</p>
<p>Whilst we appreciate that the HRA/AA does not conclude there will be no adverse effects on integrity at this stage, instead advising the assessment is completed at a later stage with further information, Natural England advise the conclusion of this assessment is that an adverse effect on integrity has not been ruled out. The company should either drop the scheme or go through the further tests of the Habitats Regulations, including assessment of alternatives. Please refer to Annex 2 where the legislative tests are set out for ease of reference.</p>	<p>The following response covers the comments from NE which relate to COL2 - River Camel Abstraction.</p> <p>Any additional information on COL2 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains, and adverse effects on the integrity of the site have not been ruled out. It is acknowledged that subsequent stages of the HRA process are likely to be required.</p>

	<p>The background information on the River Camel SAC will be incorporated into the summer 2023 updates to provide a more comprehensive overview of the potential adverse effects on the SAC from this option, specifically with reference to the existing condition, nutrient neutrality and the potential for further reduced flows as a result of abstraction.</p> <p>Ongoing discussion following the comments and report updates in summer 2023 will highlight the issues with this proposed option, and aid the decision to either remove it from the WRMP or commit to appropriate monitoring to inform the HRA.</p> <p>SWW will also update the SEA assessment to clarify whether the abstraction is planned to be within the existing licence.</p>
<p>The River Camel SAC already faces significant threats from both low flow and water quality issues, which could be exacerbated by further abstraction. Crucially, the River Camel is a nutrient neutrality site, something not noted within the HRA/AA. There is insufficient consideration therefore of how reduced flows will impact the nutrient concentration of the river. Including an option, particularly within the Preferred Plan, in which a new abstraction has the potential to exacerbate the potential adverse effects without mitigation to remove the adverse effect increase is not compliant with the tests in the legislation. Moreover, options to supply growth should not cause, add to an existing or make it more difficult to remove any adverse effect on a European Site</p>	As above.
<p>Natural England additionally questions the decision to increase abstraction in a SAC river designated for Atlantic Salmon, as a method to achieve a more naturalised flow for Salmon in a heavily modified water body (St Neot stream GB108048007640). This option should not only be considered in light of the Habitats Regulations tests but also in the light of the Environmental Improvement Plan targets.</p>	As above.
<p>The SEA suggests that this new abstraction would be an increase of 15Ml/d from the River Camel. It is unclear whether this abstraction is planned to be within the existing license. Where abstractions are increased within existing licences, they should be fully assessed to understand the impact of this increase, and the original HRA for the licence should also be made available for review.</p>	As above.
<p>WCRP Annexe A notes that “significant reductions in abstraction from the River Camel SAC are also being considered.” Natural England highlight the need for South West Water to explain in greater detail their wider plan for the Camel catchment, so it can be understood how this new abstraction fits into their supply demand balance, the overall Environmental Destination of the WRMP and meets their Environmental obligations for nature recovery as set out in Annex 2.</p>	As above.
<p>Natural England note that no detail has been provided in the dWRMP regarding the size or scale of the proposed weir associated with this option. We advise however that</p>	As above.

<p>we would consider a new weir of any size to have a likely negative impact on the designated site, with the potential to lead to further deterioration of the overall condition SSSI and further undermine the achievement of the conservation objectives of the SAC. The River Camel SSSI/SAC condition status is classed as Unfavourable No Change due to pressures from abstraction. There are existing remedies to remove structure and reduce abstraction in this SAC river, therefore Natural England would be minded to object to options which prevent recovery of the site to its conservation objectives.</p>	
<p>1.1.9c COL12 – Stannon daily abstraction increase This option seeks to increase the daily abstraction from Stannon lake by 4MI/d for 3 months of the year. This site was subject to a drought permit in 2022. Not part of the Preferred or Adaptive plans, this option nevertheless appears to be planned for delivery in 2023. We agree with the opinion of the AA, which advises with the information available at this stage, that there is a likelihood of adverse effects on the integrity of the River Camel SAC as a result of increased abstraction within Stannon. The results of monitoring and modelling undertaken as part of the recent drought permit (determined 11/11/2022) should be interrogated to inform the formal HRA. The potential for downstream flow reduction as a result of this increased abstraction should be considered in the formal HRA, particularly where this may impact mobile SAC species (Otter, Bullhead, Atlantic Salmon)</p>	<p>Any additional information on COL12 provided in Spring 2023 has been used to update the HRA. Additional monitoring and assessment will be included where sufficient uncertainty remains.</p> <p>The drought permit information will be sought for future versions of the report, and any subsequent project-level updated HRA for this option.</p>
<p>1.1.9d COL20 – River Fal New Abstraction Although not included within the Preferred Plan, this option proposes a new abstraction and treatment works on the River Fal. We note that this proposed new abstraction will be within the Fal and Helford SAC at Ruan Laniorne. This location presents an important transition from saltmarsh through to carr and to oak dominated woodlands, and it is one of few sites in Europe, and least disturbed, where this integration occurs. Freshwater flows can be especially important for saltmarshes during drought, where they are at higher risk from water and salinity stresses. Although the exact location for the abstraction is unknown, the Table 20-2 of the AA determines that “No adverse impacts are identified during operation.”. It is the advice of Natural England that further evidence is needed to determine that there will be no operational effects as a result of this new abstraction.</p>	<p>Additional information on COL20 was provided in Spring 2023, and where relevant has been used to update the potential effects from the construction and operation of the new abstraction, particularly concerning flows.</p> <p>Any remaining uncertainty of adverse effects will be highlighted within the revised report and further assessments/monitoring recommended.</p> <p>The cumulative effects of abstraction in the catchment will be included in the revised version of the report (Autumn 2023).</p>
<p>Furthermore, we advise that where a new abstraction is proposed its impacts should be assessed in combination with existing abstractions within the catchment. As noted above, where abstractions are increased within existing licences, they should be fully assessed to understand the impact of this increase, and the original HRA for the licence should also be made available for review in line with the WRMP guidance.</p>	<p>As above.</p>

<p>1.1.10 Wimbleball WRZ Supply Options</p> <p>1.1.10a WIM7 - Increase Pynes to licence limit 66.46 Ml/d. This option seeks to abstract the full 66.46Ml/d licensed flow at Pynes WTW through asset upgrades. This option is in the Preferred Plan. Natural England again advise that where abstractions are increased within existing licences, they should be fully assessed to understand the impact of this increase, and the original HRA for the licence should also be made available for review.</p>	<p>Additional information was provided in Spring 2023, and where relevant has been used to update the potential effects from the licence increase.</p> <p>Any remaining uncertainty of adverse effects will be highlighted within the revised report (Autumn 2023) and further assessments/monitoring recommended.</p>
<p>1.1.10b WIM8 - Brampford Speke Borehole & WIM9 - Stoke Canon Borehole</p> <p>Both WIM8 and WIM9 options seek to bring existing borehole assets at Brampford Speke and Stoke Canon online, discharging flows into the River Exe for abstraction further downstream – potentially at Pynes WTW (subject of Preferred Plan option WIM7). Both are included within the dWRMP Preferred Plan. Exe Estuary SPA and Exe Estuary Ramsar have included within the HRA, however Natural England do not agree that this assessment is robust enough to determine no Likely Significant Effect. Natural England are aware that an AMP7 investigation directly concerning options WIM8 & WIM9 is in the final stages of review. We expect any findings to feed into the final environmental assessment for and delivery plan of the WRMP. Additionally, we are aware that a wider Exe WFD No Deterioration investigation has been included within WINEP24 for delivery by 2027, the outcomes of which should inform the decision to engage these assets.</p>	<p>Additional information on these options was provided in Spring 2023. This has been used to update the HRA and take a precautionary approach to identifying effects on the designated sites.</p> <p>If information on the AMP7 and WINEP investigations is available, this will be used to inform the revised assessment (Autumn 2023).</p>
<p>1.2 Strategic Environmental Assessment (SEA)</p> <p>WRMPs are prepared for water management and set the framework for future development consents of projects listed in Annex II of the EIA Directive, including groundwater abstractions and impoundments. As such, WRMPs meet the requirements set out in the SEA Regulations requiring SEA to be completed. Natural England's advice on the documents submitted as part of the SEA for this dWRMP are as follows:</p> <p>South West Water note that the SEA scoping consultation ran from 6th May – 9th June 2022. Natural England have no record of being consulted at this time, and therefore we were not able to make a meaningful contribution to the SEA process at scoping stage.</p>	<p>The Scoping Report was sent directly to Natural England by SWW via email on 06/05/22, with an invitation to participate in the consultation and information on how to respond.</p>
<p>We understand from Chapter 13 (8.4.9) that given the lack of specificity and timeframes associated with the options, that this SEA presents a high-level assessment of the proposals. This is particularly so for in-combination or cumulative assessments. We take this opportunity to again advise that Natural England are minded to object to the South West Water dWRMP if it is not improved in line with our representation before it is published.</p>	<p>Further studies will be ongoing in the future with clear plans and commitments by SWW to undertake these. This will be made clearer in the next update of the SEA Environmental Report.</p>
<ul style="list-style-type: none"> Natural England is unclear what screening distances have been used in the detailed assessment of the SEA. The SEA has been informed by the “informal” HRA, INNS Report, WFD Assessment, Natural Capital Assessment (NCA) and a Biodiversity Net 	<p>Initially within the SEA assessments, designated sites had a buffer of approximately 5km to enable the high-level assessment of the options. The SEA then drew on HRA findings,</p>

<p>Gain (BNG) Assessment. The HRA outlines the impact zone to be a maximum of 10km from the proposed option (HRA pg15) however the NCA determines a more precautionary zone of influence to be “the area of receiving (i.e., a watercourse receiving a discharge) or providing (i.e., an aquifer where abstraction will occur) environment with the potential to be altered or changed because of the options.” (NCA, pg7)</p> <p>Natural England requires more clarity as to whether the correct designated sites have been identified for each option, and at what distance the potential effects of options have been considered.</p>	<p>which utilised a buffer of up to 10km. Impacts are not solely distance based, therefore these distance thresholds were used as starting points.</p> <p>Biodiversity sites were reviewed beyond this initial threshold to identify additional sites which may be connected to or affected by the options.</p>
<p>Additionally, we advise that for the Biodiversity, Flora and Fauna objective the SEA should not rely solely on results of the HRA to determine impacts to designated sites, as interest features and boundaries can differ between SSSI and European Sites and for desalination sites the boundaries of Marine Conservation Zones are often different (MCZ).</p>	<p>The Biodiversity, Flora and Fauna SEA topic Objective 1.1 does not rely solely on HRA input but also proximities to SSSIs and the location of the options in relation to SSSI IRZs, and also proximities to MCZs relative to their boundaries. The assessments are undertaken using the Atlas GIS tool which allows these different receptors to identified via their associated shapefiles.</p>
<p>The SEA should include assessment of how the plan complies with the duties to restore nature including protected sites as set out in Annex 2.</p>	<p>The BNG and NCA assessments assess the potential of each option for habitat protection and restoration. Additionally, the potential opportunities for the options to enhance NC and BNG were considered following the NCA and BNG assessments, utilising the data and results to inform on the most appropriate potential opportunities for enhancement of the options and wider benefits.</p>
<ul style="list-style-type: none"> • The potential adverse effects of alternative and preferred plan options have been discussed. <p>The positive, negative, and neutral impacts of each option in the Least-Cost Plan and Worst Case Plan have been scored as well as each option in the Preferred Plan to compare the adverse impacts on each objective. However, the explanation of scoring against objectives often lacks detail. Specifically, in many cases the explanation of impacts on specific sites, habitats and species are not included, or where they are, the source-receptor pathway is not explored. South West Water should consider including further commentary on the specific impacts</p>	<p>The scoring methodology aligns with the SEA matrices. Scoring criteria is provided within Annex 1 - Appendix E of the SEA Environmental Report. Please note there will be a revised Preferred Plan and alternative options within the revised draft WRMP24. We will seek to expand the commentary on these topics.</p>
<ul style="list-style-type: none"> • It is the opinion of Natural England that for many options presented within SEA Summary (Chapter 8, Appendix 1), the mitigation proposals are not robust or site specific enough to mitigate the impacts that have been identified, and not all impacts have been identified. <p>Additionally, the mitigation options largely concern impacts from construction, and do not consider any legacy or operational impacts.</p>	<p>Chapter 8, Appendix 1 only serves to provide a summary of impact mitigations identified by the assessment, as stated within the 'Document purpose and summary' section. Further mitigation is set out in detail within the SEA assessment matrices within Annex 6 of the SEA Environmental Report, which detail potential mitigation measures for both construction and operational impacts.</p>

<ul style="list-style-type: none"> • South West Water have not included a detailed monitoring plan which goes beyond general suggestions (Chapter 13, Section 11) A timetabled plan designed to remove evidence gaps during this plan period should be included. This should initially target options which will be developed before 2040. 	<p>A detailed monitoring plan is currently in progress and will be included within the next round of updates for the SEA.</p>
<ul style="list-style-type: none"> • Chapter 13 (10.6.9) advises that further modelling work is being conducted to inform the outcome of the SEA. Natural England anticipates that this will impact on the development of options for the Preferred, Least-Cost and Worst-Case plans. We look forward to the proposed revisions to the SEA which aim to add more detail to the anticipated operational and construction impacts. 	<p>Comment noted for upcoming updates to the SEA Environmental Report.</p>
<ul style="list-style-type: none"> • The mapping provided in Annex D does not deliver sufficient level of detail to determine whether all relevant designated sites have been screened into the assessment. As noted in the HRA, the provision of maps for each option, or at least at WRZ level should be provided to aid future consultation. 	<p>Appendix D provides the baseline of ecological sites in the SWW region. Detail of the relevant sites in screened into the HRA assessment is provided within Annex 1, Appendix H - HRA Assessment.</p>
<p>Environmental Destination and SEA: Natural England is concerned that the Environmental Destination set out in the plan is not sufficiently robust to ensure compliance with SEA requirements. Where the companies dWRMP is relying on the Regional Plan SEA and the Environmental Destination within the plan to meet its environmental obligations it should still satisfy itself that the companies environmental obligations set out in Annex 2 are met. This includes making sure that non-European SSSI rivers and wetland SSSI and priority wetland habitats have been included in the Regional Plan Environmental Destination modelling. Species obligations and newer obligations from the Environmental Improvement Plan (EiP) should also be included within the Environmental Destination. If they are not, then the company should do additional work to include assessment of these impacts in their WRMPs.</p>	<p>Incorporation of Annex 2 and related studies can be found within Section 4 of the draft SEA Environmental Report; Appendix B of the draft SEA Environmental Report (Review of Relevant Policies and Programmes); and HRA (Appendix H of the draft SEA Environmental Report). Modelling related to the SEA and associated studies will be updated in line with future updates to the WRMP24 as required. SWW will seek to ensure that species and newer obligations are to be included within the Environmental Destination where required.</p>
<p>1.2.1 SSSIs in the SEA Natural England acknowledges that SSSIs have been included in the SEA objectives as assessment questions and sub-themes within 'Biodiversity', however would encourage South West Water to assess SSSIs in a clearly identifiable, separate section of the SEA; this would enable potential impacts on SSSI features to be assessed.</p>	<p>SSSIs are specifically included within SEA Objective 1.1 and the effects on these sites are described in the detailed SEA matrices (Annex 6, Appendices L-Q of the SEA Environmental Report).</p>
<p>Furthermore, where protected sites have been assessed against an option, these should be noted to demonstrate consideration of all relevant sites. When assessing impact, designated features, condition, and threats should be considered. This will enable South West Water to understand their resilience to any potential impacts of reduced water levels through abstraction or drought, for example.</p>	<p>The baseline environmental review (Annex 1: Appendix C of the draft SEA Environmental Report) forms an evidence base against which environmental issues or opportunities resulting from the WRMP24 can be assessed, which feeds into the SEA assessment. Designated sites in close proximity to options are detailed in the SEA matrices (Annex 6, Appendices L-Q of the SEA Environmental Report). Additionally, cumulative effects on protected sites are outlined within Chapter 10.5 of the SEA Environmental Report.</p>

<p>1.2.1a COL2 - Colliford PS Stage 2 – River Camel Abstraction</p> <p>Chapter 13 (4.3.6) notes that an AMP7 investigation is currently being scoped to understand the effects of abstraction in the Camel catchment, aiming to recognise how current licenses impact the ability of waterbodies to achieve their European Sites Conservation Objectives or Favourable Condition for Sites of SSSIs. We expect the outcomes of this investigation to inform the environmental assessment and ultimate destination of option COL2.</p>	<p>Relevant options assessments to be amended upon receipt of AMP7 investigation findings.</p>
<p>Chapter 13 outlines the potential for moderate long-term negative effects as a result of this option for objectives 1.1, 1.2, 2.1 and 5.1 of the scoring matrix; objectives directly relating to designated sites, biodiversity, water resources and carbon emissions. This scoring explains that increased abstraction at this location has the potential to promote water level changes, affect ground water levels, impact wider hydrological connections, result in reduced flows and risk pollution incidents. The stage 2 WFD Assessment for COL2 notes that “the proposed abstraction (90Ml/d) is large in comparison to mean flow and a reduction in flow downstream of the abstraction may significantly affect the hydrological regime and conditions for biology” (WFD, pg37), scoring the option as presenting a ‘significant risk of deterioration’. The deterioration of a WFD water body is also likely to result in an adverse effect on integrity of an overlapping European Site7.</p> <p>Potential deterioration of an SAC is not a moderate effect and this SEA criteria should be amended to reflect the major impact on the designated sites. Natural England advises that the level of resilience that a Protected Site has to withstand potential impacts from reduced water levels through abstraction or drought, is considered within the environmental assessment.</p>	<p>SEA assessment will be reviewed and updated accordingly.</p>
<p>Natural England do not agree that the mitigation noted in Chapter 8 presents a sufficient strategy to mitigate the negative long-term operational effects projected as a result of this option – particularly where they are not yet known.</p>	<p>The specific detail regarding mitigation is outlined within Chapter 11 of the SEA Environmental Report and also Annex 6 of the report (Appendices L-Q). Further information will be provided where possible in the revised SEA Environmental Report.</p>
<p>1.2.1b COL9 – Leswidden Pool</p> <p>Although not listed as part of the preferred plan, we note that this option supports the Colliford Adaptive Strategy and as such has the potential to be an option brought forward for deployment. This option seeks to transfer raw water from the new reservoir Leswidden Pool to the existing asset Drift Reservoir. It is not clear whether option COL9 Leswidden Pool has been assessed for impacts to Penwith Moors SSSI – the site does not appear to be included on Annex D Figure D1.</p>	<p>It has been acknowledged that an update to the COL9 SEA is required to include assessment of the potential impacts to the Penwith Moors SSSI. Would this also need to be mentioned in the HRA?</p> <p>It has also been acknowledged that the granularity of Appendix D Figure D1 is not clear, and will be improved for the next iteration of the SEA Environmental Report.</p>
<p>At 3,152 ha Penwith Moors is one of the largest expanses of semi-natural habitat in the South West and includes one of the largest areas of lowland heathland habitat in Britain (around 1,200 ha). It also supports wetlands, areas of unimproved grassland and a diversity of species including plants, lichens, invertebrates, and a breeding population</p>	<p>No options are in close proximity to this SSSI or have been identified to have LSEs. However, Penwith Moors will be included within the environmental baseline in the SEA Environmental Report (Chapter 5) in the next revision of the report.</p>

<p>of Dartford warbler. It was notified on 7 October 2022 and as such should be included within the SEA.</p>	
<p>1.2.1c COL11 – Hawk’s Tor Pit COL11 is part of the dWRMP Preferred Plan and Chapter 11 Table 2 notes that South West Water are currently looking to implement this abstraction permanently in 2023. This option is within close proximity to both Hawkstor Pit SSSI and Bodmin Moor North SSSI. We are unclear as to whether these sites have both screened into this assessment due to lack of this detail within the SEA.</p>	<p>Hawk’s Tor Pit SSSI and Bodmin Moor North SSSI were both included in the COL11 SEA. Both sites were specifically mentioned in the detailed SEA assessment matrix for COL11, see SEA Environmental Report Appendix M.</p>
<p>Natural England are aware that the Warleggan River, which at the time of Hawkstor Pit SSSI’s notification ran parallel to the east of the pit, has, by natural processes, resumed its original course and now flows into the north of the pit. Unit 2 of Bodmin Moor North SSSI borders the proposed abstraction site and is in Unfavourable Recovering condition. This unit is designated in part for its acidic fen, wet heath, blanket bog, and valley bog. Any permanent abstraction at this location should demonstrate consideration of the potential impacts to the surrounding and SSSI features, as well as the potential for any hydrological connectivity to the Bodmin Moor North SSSI.</p>	<p>Comment noted for the ongoing updates to the SEA Environmental Report and associated assessments.</p>
<p>1.2.1d ROA15 Gatherley Phase 2 As noted in section 1.1.8c of this letter, Natural England is not satisfied that a thorough enough assessment has been carried out in respect of this option to determine no LSE. As the SEA has been informed by this assessment, we therefore do not have confidence that the scoring of this option against the objectives reflect the true impact of the proposals.</p>	<p>The Plymouth Sound & Estuaries SAC and Tamar Estuaries Complex SPA are noted to be hydrologically connected to the option, but ROA15 is located sufficient distance away to not cause LSEs. The SEA is not only informed by the HRA to draw conclusions on the biodiversity SEA topic, and also reviews potential impacts on SSSIs, Nature Reserves, and other designated and non-designated sites (see SEA Environmental Report Annex 6, Appendix N for further details).</p>
<p>Furthermore, Natural England advise that the potential for downstream impacts to marine features from changes to freshwater inputs should be properly assessed. This option lies upstream of Plymouth Sounds and Estuaries SAC, Tamar Estuaries Complex SPA and Tamar-Tavy Estuaries SSSI, all of which support and host marine features. It is not clear if Tamar-Tavy Estuaries SSSI has been screened into this assessment.</p>	<p>Regarding downstream impacts to marine features, the SEA Environmental Report and relevant assessments will be reviewed to ensure this is appropriately reflected. Tamar-Tavy Estuary SSSI is screened into the assessment as various options are identified as having the potential for effects on this site, e.g. ROA4 (see SEA Environmental Report Annex 6, Appendix N for further detail on the SEA assessments).</p>
<p>1.2.1e WIM8 - Brampford Speke Borehole & WIM9 - Stoke Canon Borehole It is not clear whether Brampford Speke SSSI, Exe Estuary SSSI and the River Barle SSSIs have been considered as part of the SEA. The River Barle SSSI is located in the headwaters of the River Exe catchment and is designated for Atlantic Salmon – the SEA should consider impacts to upstream migration, including an assessment of impacts should the downstream flow from Wimbleball Reservoir be reduced when the boreholes are operational.</p>	<p>These sites were indirectly referenced in the SEA matrix for these options as ‘ecological SSSIs hydrologically connected to the option through groundwater’ (see SEA Environmental Report Annex 6, Appendix O), however we will clarify this in the updated SEA Environmental Report.</p>
<p>As above, Natural England are aware that an AMP7 investigation directly concerning options WIM8 & WIM9 is in the final stages of review. We expect any findings to feed</p>	<p>SWW have confirmed they are assessing this further via hydro-ecological modelling work (see Chapter 4.3 within the SEA Environmental Report). Further updates to the SEA</p>

<p>into the final environmental assessment for and delivery plan of the WRMP. again, we are aware that a wider Exe WFD No Deterioration investigation has been included within WINEP24 for delivery by 2027, the outcomes of which should inform the decision to engage these assets.</p>	<p>Environmental Report will include findings from the AMP7 WINEP investigations where available.</p>
<p>1.2.1f Isles of Scilly (IoS) Boreholes (ISMY1, ISMY2 & IST1) The SEA assesses a number of undefined supply side options on the Isles of Scilly, three of which concern the drilling of new boreholes at undisclosed locations on St Mary's and Tresco Islands. It is unclear which designated sites have been screened into these assessments due to the lack of detail within the SEA report and the resolution of the accompanying map in Appendix D.</p>	<p>The final SEA Environmental Report and associated appendices will include all options which are proposed for the WRMP. At the time of response, all Isles of Scilly options have been removed. It is acknowledged that if they are reinstated, or new options arise, full detailed environmental assessments would be required, and would need to be included in the reporting.</p>
<p>Natural England note that a condition applied to the existing abstraction licenses issued to South West Water in 2021 stipulated comprehensive monitoring of Lower Moors SSSI and Higher Moors & Porth Hellick Pool SSSI on St Mary's, and Great Pool SSSI on Tresco. Both St Mary's SSSI's are currently in Unfavourable Declining condition, in part due to impacts from drying due to water abstraction. Before further groundwater abstraction plans are finalised, Natural England advise that a Water Level Management Plan be developed by South West Water, which should inform the decision to develop these options further. Natural England are therefore minded to object to these options, until South West Water can demonstrate that no further harm will occur to the SSSIs as a result of these options.</p>	<p>The final SEA Environmental Report and associated appendices will include all options which are proposed for the WRMP. At the time of response, all Isles of Scilly options have been removed. It is acknowledged that if they are reinstated, or new options arise, full detailed environmental assessments would be required, and would need to be included in the reporting.</p>
<p>1.2.2 Protected landscapes in the SEA Natural England appreciates that protected landscapes have been identified and scoped into the SEA and note that assessment determines that negative effects are largely neutral or minor. We note however that the assessment is very high-level and it is not possible for Natural England to fully assess the adequacy of the generic mitigation options presented in the context of specific cases, particularly where new above ground infrastructure is proposed.</p>	<p>The SEA process is high level, strategic and iterative - more detail will be provided as process continues. Site assessments and detailed site-specific mitigation will take place once options are progressed further.</p>
<p>1.2.3 Biodiversity in the SEA Natural England welcomes the consideration given to the NERC duty (as strengthened by the Environment Act 2021) and recognises the ambition of South West Water at early feasibility stage to restore and enhance habitat. We are pleased to note that South West Water has conducted Natural Capital and Biodiversity Net Gain assessments to support the SEA and look forward to the development of these as options are more definitely outlined.</p>	<p>SWW welcomes the comment that NE are pleased to note that SWW has conducted Natural Capital and Biodiversity Net Gain assessments to support the SEA.</p>
<p>The assessments consider priority habitats and species, however at such an indefinite stage in option development it is unclear whether all the potential impacts have been</p>	<p>The assessment findings reflect the level of detail available at this stage of option development. It is agreed that further project-level assessment and mitigation is required</p>

<p>identified and therefore whether any proposed mitigation or monitoring is sufficient, or whether any potential net gain will be realised.</p>	<p>as options develop, and this will be undertaken as designs progress. The current environmental assessments have assessed the likely impacts and potential mitigation measures, however these will be detailed further in consultation with NE as options develop.</p>
<p>Natural England notes that Appendix J identifies Option COL2 to likely result in the permanent loss of ancient woodland, an irreplaceable habitat. We advise that in terms of the Biodiversity Net Gain Metric 3.1, although classed as an irreplaceable habitat, ancient woodland is not a discrete habitat type and, as such, is not listed in the metric (BNG User Guide, 3.5.10.) Care should be taken to record the habitat fully when surveying, and where loss of irreplaceable habitat is proposed, bespoke compensation needs to be agreed on a case-by-case basis with the determining body or planning authority, and the options should meet the strict planning tests for the loss of such irreplaceable assets.</p>	<p>SWW welcomes the received advice and it is noted that irreplaceable assets will be assessed and accounted for in line with all relevant guidance and legislation, when required. Due to the early stage of option development, the current assessment is based on publicly available mapping data, and baseline site surveys and associated data are not available at this stage. Compensation will be determined in later stages, where applicable, in consultation with the relevant stakeholders.</p>
<p>12.4 Species Recovery and Protected species Natural England notes that there has been no assessment of the dWRMP, or current operations, on species abundance. Natural England Standing Advice for Protected Species is available on our website to help local planning authorities and others, including water companies, better understand the impact of their operations and development on protected or priority species should they be identified as an issue at developments or plans. This also sets out when, following receipt of survey information, the authority (or the undertaker in regards of the exercise of permitted development rights) should undertake further consultation with Natural England.</p>	<p>SEA is high-level and in-field surveys and associated data are not available at this stage to inform the assessments of the options. Assessment of species abundance can take place once options have been developed further, which will inform future decision-making alongside consultation with NE.</p>
<p>Natural England suggests that South West Water consider further assessment of the impacts of the dWRMP on species abundance and recovery, with measures put in place to halt any decline in species abundance in line with the 25-year Environment Plan targets, and in addition to the wider biodiversity targets that are required to be met by 2042 in the Environment Act and 25 Year Environment Plan, now the Environmental Improvement Plan.</p>	<p>Assessments and surveys at the site level will be undertake when options have been further developed. Species abundance and recovery will be part of these site level assessments to further refine likely effects on biodiversity and any additional mitigation required.</p>
<p>We strongly recommend that South West Water commit to a robust monitoring plan which considers both present and future INNS management.</p>	<p>The monitoring plan is being updated for the revised draft WRMP (Autumn 2023).</p>
<p>In terms of this future outlook, we encourage South West Water to consider an adaptive approach to managing the spread of INNS. Climate change presents the risk that new INN species may be introduced, which if not anticipated could lead to inadvertent spread and colonisation.</p>	<p>The monitoring plan is being updated for the revised draft WRMP (Autumn 2023). We note the comment regarding climate change impacts on INNS risk, and will ensure this is considered in the update.</p>
<p>We encourage South West Water to consider their future INNS management across a range of climate change scenarios (2° and 4°) to proactively identify new and emerging</p>	<p>As above.</p>

<p>risks. This is especially pertinent for those options noted above which include the inter-catchment transfer of water, particularly where water is to be first transferred to an open reservoir.</p>	
<p>1.2.6 Marine Conservation Zones (MCZs) in the SEA. Natural England welcomes that MCZs are included within the Biodiversity topic, however advise that their assessment is made in a clearly identifiable separate section of the SEA. Furthermore, as highlighted in our SEA response to option ROA15, we advise that it is unclear whether freshwater inputs into estuaries, transitional habitats and saltmarshes have been considered.</p>	<p>The SEA assessment framework was consulted on in 2022 and no amendments were required. MCZs are specifically described in the commentary of SEA Objective 1.1, and likely significant effects are described within the detailed SEA matrices (Annex 6 - Appendices L-Q).</p> <p>Regarding specific assessment of freshwater inputs into estuaries, transitional habitats and saltmarshes, the SEA of options is high level and is restricted by the data available at the time of issue, and therefore specifics into impacts on these habitats may not be possible without further assessment/studies such as hydrological modelling. Future updates to the SEA report will seek to ensure these potential impacts are reflected in the commentary and any uncertainty is captured.</p>
<p>1.2.6a Desalination Natural England understands that further options may be presented within the final dWRMP concerning new locations for desalination in Cornwall, as well as expansion of existing desalination operations on the Isles of Scilly. We expect thorough assessment of designated sites in marine environments to inform the SEA for these future proposals.</p>	<p>At the time of response, all Isles of Scilly desalination options have been removed. It is acknowledged that if they are reinstated, or new options arise, marine elements will be considered.</p>

ID Reference: 063 Westcountry Rivers Trust	
Feedback	South West Water Response
<p>ACTION 7 – Increase the level of river and fisheries monitoring and planning through Catchment Fisheries Plans to allow sufficient understanding of current aquatic species including fisheries assessments and actions that will increase habitats and species resilience. This needs to include a fish in distress monitoring scheme and fish rescue team that can work alongside the Environment Agency. It should also support low flow monitoring through the Citizen Science Investigation network.</p>	<p>SWW are keen to support the creation of Catchment Fisheries Plans and are committed to working in partnership with local delivery organisations, catchment partnerships and government agencies to meet our statutory duties in relation to eels, freshwater migratory fish, and maintaining healthy and resilient fish stocks. The recruitment of specialist fisheries expertise into SWW is evidence of this commitment.</p>



**South West
Water**

Appendix Three

Responses in full (anonymised)

