



**South West
Water**

Strategic Environmental Assessment Statement of Response

Addendum

January 2024

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Consultation responses relating to Strategic Environmental Assessment (SEA)

Note:

Our draft WRMP Strategic Environmental Assessment (SEA) was published for consultation in February 2023 alongside our draft WRMP (v1). These consultations closed in May 2023. We published our Statement of Response (SoR) to both the WRMP v1 and the SEA in April 2023 and provided an update to the WRMP v1 SoR in October 2023.

Following the consultations, our WRMP was updated and a revised draft, (v2), was published in October 2023 for a second consultation. This closed in November 2023, and our WRMP v2 SoR summarising the feedback received and our responses to these has been published on the [WRMP pages of our website](#)

A few stakeholders responding to the WRMP v2 consultation also provided further comments on the SEA. To ensure that the SoR for the SEA provides a comprehensive record of all the feedback received from customers and stakeholders, these comments and our responses are recorded in this Addendum to the SEA SoR.

An updated Appendix 7 (SEA Environmental Report) was published on 20 Dec 2023, and contains many of the updates discussed herein. An updated and revised WRMP v3 and SEA Environmental Assessment will be produced in early 2024, to incorporate any remaining comments.

ID Reference: R02 Environment Agency

Feedback	South West Water Response
6.1 Our previous comments on the SEA addressed, amongst other things, the approach taken to the assessment of impacts. We note that some revisions and improvements have been made to the SEA including the heritage assessments that it contains (Annex 6: Appendices L-Q). As a general point, we suggest that consideration also ought to be given to situations where archaeological recording may be required as a form of mitigation.	Comment noted. The suggestion of archaeological recording as a form of mitigation for effects to the historic environment has been added to Chapter 11 of the SEA Environmental Report - Revision I (Dec 2023).
6.2 We note that South West Water is now preparing a plan-level SEA for its Best Value plan, which will be complete by the time of South West Water's final Statement of Response. As part of this, full SEA is currently ongoing for a number of new options. In accordance with the Plan's Best Value Objectives, these findings should influence the selection of options in the final preferred Plan. We note therefore that while drought option DRS15/E is currently undergoing full SEA, it is stated in the draft SEA Environmental Report that this option will directly encroach on a World Heritage Site,	<p>We are currently reviewing our decision-making around our best value plan (BVP) using the completed environmental assessments to ensure it has no material impact on our best-value plan choices. The outcome of this next phase of decision making will be included in our WRMP v3.</p> <p>Although the SEA has identified that multiple heritage assets coincide or are in close proximity with option DRS15/E, the option would not require construction works but rather use existing infrastructure at the Roadford reservoir in drought conditions.</p>

<p>Scheduled Monuments and Listed Buildings. Can these impacts be avoided or mitigated? If not we would question whether the selection of this option can be justified.</p>	<p>Therefore, effects on heritage assets are not anticipated. Option level SEAs can be found in Annex 6, Appendix L - P of the SEA Environmental Report - Revision I (Dec 2023)</p> <p>It should also be noted that this option is not included within the BVP or plan alternatives.</p>
<p>6.3 Within the detailed SEA of options (Annex 6: Appendices L-Q), negative effects on the historic environment are recorded against a number of options selected for inclusion in the preferred or adaptive plan. We note with particular concern that major negative effects are recorded for option ROA17 (Littlehempston WTW), which is selected for the adaptive plan.</p>	<p>ROA17 is required to enable resources to be supplied by local sources in the short term in this area of the Roadford WRZ. In the longer term, it facilitates ROA21 (Roborough to Littlehempston transfers) which brings more raw water into the area from the River Tamar. This is required to allow for abstraction reductions and the delivery of the Environmental Destination on the River Dart and Littlehempston groundwater sources. Without ROA21 and ROA17, the abstraction reductions cannot be made because there are no new local sources of water.</p> <p>ROA17 was identified to have a pre-mitigation score of potential major negative effects on the Historic Environment SEA Objective 6. When the identified mitigation has been applied, these effects are likely to be moderate negative in line with the SEA Framework and SEA scoring criteria (Annex A: Appendix E of the SEA Environmental Report - Revision I (Dec 2023).</p> <p>Mitigation to reduce potential effects can be found within the SEA assessment for this option (Annex 6: Appendix N of the SEA Environmental Report). Further studies are recommended as part of the mitigation proposal for this option as it develops, such as the additional baseline collection and assessment to determine previously unrecorded assets, including water-dependant heritage assets/water sensitive historic environments. It should also be noted that the SEA is a high level environmental assessment, and further option specific mitigation measures are expected to be developed as options progress through the project stages.</p>
<p>6.4 It is also of considerable concern that option WIM5 (Indirect potable reuse – stream support for Dotton WTW), selected for the adaptive plan, is recorded as ‘intersecting’ or directly encroaching on numerous listed buildings. On this basis it is unclear why WIM5 is recorded as having only minor negative impacts on heritage as the assessment seems to indicate major impacts? While we acknowledge that there is a proposed mitigation measure to ‘Consider the route of the pipeline to potentially reduce effects on assets which are directly encroached upon’, we are concerned that this does not adequately reflect the legal duties in relation to designated heritage assets and the ‘great weight’ that the NPPF places on their conservation. The NPPF goes on to state that substantial harm or total loss to a designated heritage asset should be ‘exceptional’ or ‘wholly exceptional’, according to the type and grading of asset affected. We therefore suggest</p>	<p>It should be noted that all options are at an early stage of development and information on specific details such as pipeline routes are yet to be confirmed. The SEA assessment provides a high level assessment of the information available at the time of writing. Therefore, routing the pipeline route around heritage assets is a mitigation measure that would be expected to significantly reduce the residual effects on SEA Objective 6 for the WIM5 option.</p>

<p>that greater commitment is needed to avoid or mitigate these impacts, or that the selection of this option is reconsidered.</p>	
<p>6.5 If further comment is needed on the specific heritage impacts of the selected options, we would require additional information on the nature of the infrastructure proposed, and its location/footprint (preferably including GIS shapefiles), including the routing of pipelines and extent of construction corridors.</p>	<p>It should be noted that all options are at an early stage of development and information on specific details such as pipeline routes are yet to be confirmed. The SEA assessment provides a high level assessment of the information available at the time of writing. Therefore, routing the pipeline around heritage assets is a mitigation measure that would be expected to significantly reduce the residual effects on SEA Objective 6 for this option.</p> <p>At this stage, option specific locations cannot be provided within published documents due to security reasons. We are, however, happy to share information with Natural England upon request.</p>
<p>6.6 Clearly there is potential for the selected options, including the SROs, to result in significant adverse impacts on the historic environment. Where appropriate these proposals should therefore be subject to Heritage Impact Assessment, desk-based assessment and field evaluation to inform their design and subsequent decisions on planning or other consents. 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 avoided, minimised or mitigated, and that where possible opportunities are taken to secure enhancements</p>	<p>The SEA is an early stage strategic level assessment to inform decision making. Options will be further developed and refined as they are brought forward, and it would be during this process that the Heritage Impact Assessment would be undertaken on an option-by-option basis as required, during the detailed design processes. It is understood that further engagement with Historic England will be sought throughout these future stages of design and investigation.</p>
<p>Colliford WRZ</p> <ul style="list-style-type: none"> • Lanhydrock – this 890-acre estate owned by the Trust is located north of Restormel, and spans either side of the River Fowey; the house is grade I listed and is surrounded by a grade II* registered Park and Garden. [e.g. preferred Scheme COL15 in vicinity] • Godophin – this 550-acre estate owned by the Trust is located adjacent to the River Hayle; the house is grade I listed and is surrounded by a grade II* registered Park and Garden. Parts of the West Cornwall Bryophytes SSSI are located at / alongside the river in this location. 	<p>Effects on the historic environment are assessed under SEA Objective 6.</p> <p>In reference to COL15, Lanhydrock Registered Park and Garden has been identified as potentially being affected by the option. However, due to anticipated mitigation, this has been assigned a minor negative score based on the SEA scoring criteria presented within Annex A: Appendix E of the SEA Environmental Report - Revision I (Dec 2023).</p> <p>Full SEAs can be found within Annex 6: Appendix L- P of the SEA Environmental Report.</p>
<p>Wimbleball WRZ</p> <ul style="list-style-type: none"> • Knightshayes Court – this Trust-owned estate is located immediately to the west of Allers WTW and reservoirs; the house is grade I listed and is surrounded by a grade II* registered Park and Garden. [e.g. preferred Scheme WIM12 in vicinity] 	<p>Effects on the historic environment are assessed under SEA Objective 6.</p> <p>In reference to WIM12, Knightshayes Court has been identified as potentially being affected by the option. During the SEA, a minor negative score has been assigned, based on the scoring criteria presented in Annex A: Appendix E of the SEA Environmental Report - Revision I (Dec 2023).</p> <p>Full SEAs can be found within Annex 6: Appendix L- P of the SEA Environmental Report.</p>

<p>Bournemouth WRZ</p> <ul style="list-style-type: none"> • Kingston Lacy – an 8,500-acre estate west of Wimborne Minster, the majority of which lies within Cranborne Chase and West Wiltshire Downs AONB. At the core of the estate is a grade II registered Park and Garden together with the grade I listed Treasure House. The Trust also holds covenants over a significant amount of land to the north-east of Wimborne Minster. [e.g. preferred Scheme BNW6 in vicinity] • Holt Heath and Forest – part of the Kingston Lacy estate, to the north-east of Wimborne Minster. A substantial part of Holt Heath NNR, one of the largest and most important areas of lowland heath in Dorset with SSSI/SAC/SPA designations and RAMSAR site. [e.g. preferred Scheme BNW6 in vicinity] • Ibsley and Rockford Commons – part of the New Forest Northern Commons and within the New Forest National Park, located north of Ringwood and east of Ibsley. A mosaic of heathland, wetlands and ancient woodland pasture with SSSI/SAC/SPA designations and RAMSAR site. [e.g. preferred Scheme BNW6 in vicinity] 	<p>Effects on the historic environment are assessed under SEA Objective 6 and effects on designated and non-designated sites are assessed under SEA Objective 1.1. The Holt Heath NNR and Kingston Lacy Registered Park and Garden are noted but have not necessarily been identified within the 500m buffer used for assessment of effects for heritage assets and NNRs.</p> <p>Full SEAs can be found within Annex 6: Appendix L - P of the SEA Environmental Report (Dec 2023).</p>
<p>Recommendation 6: Provide completed Environmental Assessments. R6.1. SEA and HRA. As part of its pre-consultation, South West Water notified us that it would be unable to provide a fully completed SEA and formal HRA. This is as the company identified options which its consultants did not have sufficient time to fully integrate into the assessments. The revised draft WRMP24 did not include a fully completed SEA and formal HRA, as notified by the company.</p>	<p>The complete SEA Environmental Report - Revision I (Dec 2023) and HRA report (Annex 2: Appendix H) have now been provided. These reports will align with the WRMP24 v2 published on 02 October 23.</p>
<p>R6.2. Impact of incomplete environmental assessments on options. Linked with Recommendation 6.1, it is unclear whether the incomplete SEA and formal HRA would have an impact on the options selected by the company in the programmes presented in the plan</p>	<p>The complete SEA Environmental Report - Revision I (Dec 2023) and HRA report (Annex 2: Appendix H) have now been provided. These reports will align with the WRMP24 v2 published on 02 October 23.</p>
<p>Improvement 11: Improve Strategic Environmental Assessment (SEA), Habitats Risk Assessment (HRA), Invasive Non-Native Species (INNS) assessments and Biodiversity net gain and Natural Capital assessments. I11.1. SEA objectives. In our May 2023 representation, we raised that South West Water had not incorporated the objectives of its WRMP into its SEA. The company still do not appear to have done this.</p> <p>The company has provided a short summary of its best value plan in chapter 10 of its SEA. However, it relies heavily on acronyms and perceived knowledge of these options.</p> <p>We have noted that construction and implementation timelines are unknown at this stage but may be reflected in the revised December 2023 SEA. Therefore, cumulative effects assessment is only indicative at this stage.</p>	<p>The WRMP Objectives have now been incorporated into Section 2.2 of the SEA Environmental Report (Dec 2023).</p>

<p>I11.2. SROs in SEA. In our May 2023 representation, we asked the company to include SROs in its SEA. The company has now included SROs in the intra plan cumulative effects assessment. However, there is limited further commentary around the SRO cumulative effects.</p>	<p>The SROs have not been assessed individually by Mott MacDonald through the SEA process set out in Appendix 7, Chapter 8 (Methodology) of the SEA Environmental Report - Revision I (Dec 2023). It is noted that WIM18 follows a similar methodology and the high-level SEA outputs are presented in Section 9.7 of the SEA Environmental Report - Revision I. The remaining SROs have been assessed through a separate environmental process.</p> <p>SRO options included within the BVP (best value plan) and alternative plans (BNW7, BNW and WIM18) have been incorporated into the intra and inter cumulative effects assessments within Chapter 10 of the SEA Environmental Report (Appendix 7), using the information available at the time of writing.</p>
<p>I11.4. SEA study area and temporal span. In our May 2023 representation, we raised concerns with the company's buffer zones and temporal scope of its SEA. The company has now included baseline maps SEA Annexes, but the use of buffers within the text is not very clear. There is also limited reference to the temporal scope of the SEA within the October 2023 SEA. There remains limited information on local and regional baseline conditions for some topics, for example. biodiversity designated sites.</p>	<p>Further information on the temporal scope of the SEA and the study area used in the environmental assessments has been incorporated into Section 8.2.8 of the Environmental Report - Revision I (Dec 2023).</p> <p>Baseline information can be found in Section 5.2 of the SEA Environmental Report. This includes a section on biodiversity detailing information on designated sites.</p>
<p>I11.6. SEA mitigation and monitoring measures. In our May 2023 representation, we raised with the company concerns on its mitigation proposals. However, the proposals are very high level and generic in nature. Additionally, several of the measures are focussed on the construction stage. The mitigation hierarchy is also still not referred to. The company has 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. However, it is not clear how these will be mitigated for. We also raised in our representation concerns on the detail included in the monitoring plan. The revised draft plan still contains 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>Options specific mitigation is provided within the SEA Assessments (SEA Environmental Report - Revision I (Dec 2023), Annex 6: Appendix L - P). As these are high-level in nature, mitigation measure are often generic, as there remain project-unknowns such as for carbon, and the type of material to be used during construction has not yet been confirmed. As options develop it is expected that further option specific mitigation will be identified.</p> <p>A Mitigation and Monitoring Plan has been prepared (Annex 7: Appendix Q of the SEA Environmental Report) which details option specific mitigation and monitoring requirements for each of the BVP options.</p> <p>Reference to the mitigation hierarchy is included within Chapter 11 of the SEA Environmental Report and the Mitigation and Monitoring Plan.</p>
<p>I11.7. Mitigation in the HRA. The HRA is adequate for indicating the potential effects of the options on relevant designated sites to identify significant constraints and assist with the option shortlisting process.</p> <p>However, further assessment and targeted ecological survey data should be obtained to mitigate potential adverse impacts at the project stage.</p> <p>Mitigation measures and enhancement opportunities have been identified in the individual option assessments, but these require further development with more detailed studies and assessments to provide site specific mitigation at the project stage.</p>	<p>A Mitigation and Monitoring Plan has been prepared (Annex 7: Appendix Q of the SEA Environmental Report - Revision I (Dec 2023)) which detailed the option specific mitigation and monitoring requirements for each of the BVP (best value plan) options. This includes requirements for targeted ecological surveys and assessments.</p>

<p>I11.8. Monitoring INNS. In the SEA, reducing the spread or presence of INNS is included as an objective under the Biodiversity, Flora, and Fauna section of the SEA objectives. However, there is no mention of INNS monitoring in the SEA Section 11, 'Monitoring Proposals'.</p>	<p>A Mitigation and Monitoring Plan has been prepared (Annex 7: Appendix Q of the SEA Environmental Report - Revision I (Dec 2023)) which outlines the INNS monitoring requirements for each of the BVP (best value plan) options.</p>
<p>I11.9. Accuracy in describing option impact. In Appendix 7.1, Section 3.2.7, the assessment for option COL15 states that the “WFD assessment identified minor localised impacts (impact score 1) to biological quality elements, hydromorphological supporting elements and physio-chemical quality elements. This is due to an increase in the daily peak abstraction of surface water in this water body.” The WTW capacity increase will be permanent which suggests the impact score should be 2 (impact score 1 = only “short term” and “fully reversible”).</p> <p>Furthermore, the plan states that the Lower River Fowey water body is currently at good status and this option is not anticipated to negatively impact its status, and no risk to achieving waterbody objectives has been identified. However, there is a significant EFI deficit in the Lower Fowey, already at risk of abstraction pressures in this catchment. Any increase in licenced quantity is likely to increase this risk.</p>	<p>The WFD Report (SEA Environmental Report - Revision I (Dec 2023), Annex 3: Appendix I), presents the Level 2 assessment which does identify a low risk associated with this option. Mitigation measures include 'Continuation of appropriate compensation flow from Colliford Reservoir and Siblyback Lake to supply River Fowey with enough flow volume and velocity for new abstraction daily peak increase' and 'Ensure abstraction conditions are still set in order to minimise changes to hydrological regime'.</p> <p>Further detail on mitigation and monitoring of the BVP (best value plan) options can be found within Annex 7: Appendix Q of the SEA Environmental Report, which is available upon request.</p>
<p>I11.10. WTW capacity and treatment for INNS prevention. In the updated INNS report, for the Level One assessment, the company has assumed that with the physical transfer of untreated water, any transferred INNS would be treated/removed at the water treatment facility. This assumption has not been justified or explained.</p>	<p>The assumption is made that any raw water would be treated for INNS at the WTW. This is taken as an appropriate assumption to reduce the risk of INNS spread. Refer to the INNS report for further information SEA Environmental Report - Revision I (Dec 2023), Annex 5: Appendix K.</p>
<p>I11.11. INNS risk score assurance. As stated on page 41 of the INNS report “a lack of detailed information about some options means that risk scores may be subject to change as assessments are re-evaluated in the future.” The company has not stated how it will gather more information on INNS to improve risk score assurance.</p>	<p>The assumption is made that any raw water would be treated for INNS at the WTW. This is taken as an appropriate assumption to reduce the risk of INNS spread. Refer to the INNS report for further information SEA Environmental Report - Revision I (Dec 2023), Annex 5: Appendix K.</p>
<p>I11.12. Biodiversity Net Gain (BNG) calculation for post-works. In the BNG Summary, it is unclear what the calculations are for post-works, including how this will be addressed to change the BNG calculations to a positive outcome.</p>	<p>Further information on BNG calculations can be found in the Mitigation and Monitoring Plan, which can be made available upon request (Annex 7: Appendix Q of the SEA Environmental Report (Dec 2023))</p>

ID Reference: R01

Historic England

Feedback

South West Water Response

1. Lack of reference to the historic environment:
1.1 We remain concerned that the dWRMP24 fails to describe the historic environment of the plan area, which is of great significance and includes its historic buildings and settlements, archaeology, coastal heritage, World Heritage Sites, a range of geologies and landscape character areas.

The baseline information, as provided within Annex 1: Appendix C of the SEA Environmental Report (Appendix 7 of the WRMP), summarises the historic environment of the Plan area and includes description of the designated and non-designated heritage assets in relation to their settings. Figure D4 shows key historical constraints within the Plan area to provide further illustrative detail. As well as historic environment, this document also provides a detailed Plan-level baseline on the SEA topics of biodiversity, water resources, soils, air, population and human health, landscape and material assets, with associated baseline maps (Appendix D).

2. Objectives, best value planning and heritage considerations
2.1 We support the principal of a Best Value Plan, whereby decisions are made based not solely on cost but with consideration of other factors such as benefits to customers, the environment and society. It is therefore disappointing that the Best Value Objective to 'protect and enhance the environment', does not recognise the built, cultural or historic environment.

The historic environment is assessed under SEA Objective 6 within the SEA Environmental Report (See Annex 6 of the Environmental Report for full SEA assessments of the options), and therefore the SEA, including the Historic Environment Objective, feeds into modelling and Plan decision making.

3. 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 National Policy Statement for Water Resources 2023 (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.

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, where identified.

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 water related infrastructure such as historic canals. In this way heritage has the potential to attract positive scores within the best value framework.

The assessment of potential positive impacts on the historic environment associated with the WRMP is captured within the SEA Framework (Objective 6 - see 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 and avoid constraints, including heritage assets. See also detailed assessment matrices in SEA Environmental Report Annex 6, which contains recommendations for potential opportunities to enhance significance of heritage assets, where identified.

<p>3.3 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 undesignated 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>Option specific mitigation measures and enhancement opportunities related to the historic environment are identified within the SEA assessments (Annex 6 of the Environmental Report). Further historic environment suggestions, including the undertaking of Heritage Impact Assessment, referring to relevant Historic Environment Records and seeking the views of local authority archaeological advisers are included within Chapter 11 (Mitigation and Monitoring) of the Environmental Report. It is important to note that these assessments are strategic for early stage decision making in the Plan's development and there will be more detailed engagement and studies as options are brought forward for detailed development.</p>
<p>4.2 We acknowledge South West Water's reference, within their Statement of Response, to work with Historic England on peatland restoration. Nevertheless, we consider that the Plan itself would benefit from more explicit recognition of the influence of water management on the historic environment, recognising the potential impacts of abstraction on archaeology, paleoenvironmental remains, or water dependent heritage assets.</p>	<p>Consideration relating to the influence of water management on the historic environment is captured within the Historic Environment SEA Objective 6. Recommendations have been made within relevant SEA assessments for additional baseline collection and assessment to be undertaken at a more detailed stage, in order to determine the additional effects on water-dependent heritage assets and water sensitive historic environment. See the detailed assessment matrices in SEA Environmental Report Annex 6.</p>
<p>6.1 Our previous comments on the SEA addressed, amongst other things, the approach taken to the assessment of impacts. We note that some revisions and improvements have been made to the SEA including the heritage assessments that it contains (Annex 6: Appendices L-Q). As a general point, we suggest that consideration also ought to be given to situations where archaeological recording may be required as a form of mitigation.</p>	<p>Comment noted. The suggestion of archaeological recording as a form of mitigation against effects to the historic environment has been added to Chapter 11 of the SEA Environmental Report.</p>
<p>6.2 We note that South West Water is now preparing a plan-level SEA for its Best Value plan, which will be complete by the time of South West Water's final Statement of Response. As part of this, full SEA is currently ongoing for a number of new options. In accordance with the Plan's Best Value Objectives, these findings should influence the selection of options in the final preferred Plan. We note therefore that while drought option DRS15/E is currently undergoing full SEA, it is stated in the draft SEA Environmental Report that this option will directly encroach on a World Heritage Site, Scheduled Monuments and Listed Buildings. Can these impacts be avoided or mitigated? If not we would question whether the selection of this option can be justified.</p>	<p>We will update our WRMP Appendix 6 with a detailed summary of all the Plan alternatives assessed, together with their overall performance, including cost, benefits, environmental and carbon impacts, and provide improved justification for our best value plan using the completed SEA assessments.</p> <p>Although the SEA has identified that multiple heritage assets coincide or are in close proximity with option DRS15/E, the option would not require construction works but rather use existing infrastructure at the Roadford reservoir in drought conditions. The SEA has recommended that additional baseline collection and assessment is to be undertaken to determine the additional potential effects on water-dependent heritage assets and water sensitive historic environments.</p>
<p>6.3 Within the detailed SEA of options (Annex 6: Appendices L-Q), negative effects on the historic environment are recorded against a number of options selected for inclusion in the preferred or adaptive plan. We note with particular concern that major negative</p>	<p>The SEA is an early stage strategic level assessment to inform decision making. Options will be further developed and refined as they are brought forward and it would be during this process where we will look for further mitigation to limit the impacts on the historic environment.</p>

<p>effects are recorded for option ROA17 (Littlehempston WTW), which is selected for the adaptive plan.</p>	<p>ROA17 is required to enable resource to be supplied by local sources in this area of the Roadford WRZ in the short term. In longer term it facilitates ROA21 (Roborough to Littlehempston transfers) which brings more raw water into the area from the River Tamar. This is required to allow for abstraction reductions and the delivery of Environmental Destination on the River Dart and Littlehempston groundwater sources. Without ROA21 and ROA17, the abstraction reductions cannot be made because there are no new local sources of water.</p> <p>ROA17 was identified to have a pre-mitigation score of potential major negative effects on the Historic Environment SEA Objective. When the identified mitigation has been applied, these effects are likely to be moderate negative in line with the SEA Framework as stated within Table 7.2 of the Environmental Report. Mitigation to reduce identified potential impact on this SEA Objective can be found within the SEA assessment for this option (Annex 6 of the Environmental Report). Further studies are recommended as part of the mitigation proposal for this option as it develops, such as the additional baseline collection and assessment to determine previously unrecorded assets, including water-dependant heritage assets/water sensitive historic environments.</p>
<p>6.4 It is also of considerable concern that option WIM5 (Indirect potable reuse – stream support for Dotton WTW), selected for the adaptive plan, is recorded as ‘intersecting’ or directly encroaching on numerous listed buildings. On this basis it is unclear why WIM5 is recorded as having only minor negative impacts on heritage as the assessment seems to indicate major impacts? While we acknowledge that there is a proposed mitigation measure to ‘Consider the route of the pipeline to potentially reduce effects on assets which are directly encroached upon’, we are concerned that this does not adequately reflect the legal duties in relation to designated heritage assets and the ‘great weight’ that the NPPF places on their conservation. The NPPF goes on to state that substantial harm or total loss to a designated heritage asset should be ‘exceptional’ or ‘wholly exceptional’, according to the type and grading of asset affected. We therefore suggest that greater commitment is needed to avoid or mitigate these impacts, or that the selection of this option is reconsidered.</p>	<p>Comment noted. WIM5 is not an option within the Best Value Plan so has not been selected as part of the preferred plan. The SEA assessment for WIM5 will be reviewed and updated in line with the comment as necessary in future iterations, using the SEA Framework as outlined within Table 7.2 of the SEA Environmental report. The pipeline route is expected to avoid directly encroaching upon Listed Buildings after mitigation has been applied.</p>
<p>6.5 If further comment is needed on the specific heritage impacts of the selected options, we would require additional information on the nature of the infrastructure proposed, and its location/footprint (preferably including GIS shapefiles), including the routing of pipelines and extent of construction corridors.</p>	<p>The assessment of potential positive impacts on the historic environment associated with the WRMP is captured within the SEA Framework (Objective 6 - see 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 and avoid constraints, including heritage assets. See also detailed assessment matrices in SEA Environmental Report Annex 6, which contains recommendations for potential opportunities to enhance the significance of heritage assets, where identified.</p> <p>Note these are strategic assessments and further studies, surveys and assessments will be undertaken during option development. Further engagement with Historic England</p>

	will be sought throughout future stages. Specific locations and GIS files cannot be included in the WRMP for security reasons, but can be made available upon request.
6.6 Clearly there is potential for the selected options, including the SROs, to result in significant adverse impacts on the historic environment. Where appropriate these proposals should therefore be subject to Heritage Impact Assessment, desk-based assessment and field evaluation to inform their design and subsequent decisions on planning or other consents. 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 avoided, minimised or mitigated, and that where possible opportunities are taken to secure enhancements	The SEA is an early stage strategic-level plan assessment to inform decision making. Through this, options will be further developed and refined as they are brought forward. It would be during this process that HIA would be undertaken if it were required, on an option-by-option basis, during the more detailed design processes. Further engagement with Historic England will be sought throughout future stages.
it is our view that the importance of the historic environment, and potential for plan proposals to impact on it, are not currently adequately reflected in the dWRMP24. The findings of the full plan-level SEA should also influence the selection of preferred and adaptive options in the final plan	The SEA is an early stage strategic-level plan assessment to inform decision making. Through this, options will be further developed and refined as they are brought forward. The SEA has informed the selection of preferred and adaptive options in the final plan. Further engagement with Historic England will be sought throughout future stages of more detailed option development.

ID Reference: R03 Natural England	
Feedback	South West Water Response
<p>Natural England are minded to object to the South West Water revised dWRMP if it is not improved in line with our representation before it is published. As submitted, we consider the revised plan:</p> <ul style="list-style-type: none"> • will have an adverse effect on the integrity of the River Avon Special Area of Conservation (SAC) from continued abstraction that is not sensitive to river flow, including abstraction within the proposed cap on existing licences, • does not evidence an avoidance of additional impact on the integrity of the River Avon SAC 'from demands of new development and growth' through the proposed cap on existing licences (Sections 5.4.3 & 5.4.6 in revised dWRMP Technical Report), • will have a likely significant effect on the Avon Valley SPA/Ramsar site and River Avon SAC through a new water supply proposal at Ibsley Lake and, in assessing this proposal, is unsound in providing evidence that there would be no impact on site integrity, • will have an adverse effect on the integrity of the Isles of Scilly Complex SAC, Isles of Scilly SPA and Isles of Scilly Ramsar sites. 	<p>A detailed Mitigation and Monitoring Plan has been prepared which provides: option-specific mitigation; outlines further study and assessments required at the project level; and sets out the monitoring requirements for each option with the BVP (best value plan). Once the WRMP24 is implemented, any further mitigation measures identified during option detailed design and future development will be incorporated through subsequent revisions to the Mitigation and Monitoring Plan.</p> <p>The Isles of Scilly options are no longer included within the updated WRMP24 v2 as these are due to be implemented in AMP7, prior to the start of the WRMP24 period.</p> <p>The HRA has concluded that, at the plan level, and following the implementation of suitable mitigation and the recommendations for additional assessment, there are not anticipated to be any adverse effects on the integrity of Habitats Sites as a result of the plan.</p>

<p>Due to the constraint of a shorter consultation period for this revised dWRMP, our following comments largely focus on those options proposed as the Preferred or Best Value Plan.</p>	<p>The Mitigation and Monitoring Plan is included within Annex 7: Appendix Q of the SEA Environmental Report - Revision I (Dec 2023) and is available upon request.</p>
<p>We are pleased that South West Water responded to our comments regarding the formatting of the initial dWRMP. We welcome the easy to navigate public platform with which it has been presented, and particularly the presentation of the environmental assessments as standalone documents. We do however echo our previous comments in relation to the provision of maps for the HRA. Maps should be provided within the HRA, demonstrating the location of the assessed options in relation to Habitats 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>At this stage, maps cannot be provided within published documents due to security reasons. Regulators may make a request for option-specific maps to be provided, where available.</p>
<p>South West Water note that thirty-five new supply and drought options have been identified through the revised draft planning process, twenty-nine of which should be subject to environmental assessment as part of the dWRMP. They advise however, that due to time constraints the environmental assessment of these options was not completed before submission for consultation.</p> <p>Of these outstanding options, seven are noted as being included within the Best Value Plan (Annexe 2, Appendix H, Table 43.1), and are therefore of material consideration to the final plan.</p> <p>We additionally note the absence of environmental assessment for Isles of Scilly options, which the HRA advises have been retained in the dWRMP.</p>	<p>All supply options identified within the WRMP24 v2 have now undergone full environmental assessments (see Annex 6: Appendix L - P of the SEA Environmental Report - Revision I (Dec 2023).) The BVP (best value plan) assessment and cumulative effects have been updated (Chapter 10 of the Environmental Report).</p> <p>In our WRMP24 v2, the Isles of Scilly supply-demand balance remains in a surplus position throughout the planning period. The surplus is created by the delivery of the AMP7 Reverse Osmosis water treatment works, desalination and groundwater improvements. We don't require any further supply options for the Isles of Scilly and these are not included in the WRMP24 v2.</p>
<p>It is advised within the HRA, SEA and Main Technical Report that all of these options will undergo environmental assessment during October and November 2023, ready for inclusion in an 'updated dWRM24' submitted with the Statement of Response. - "As of September 2023, these 29 options have not yet been assessed (Strategic Environmental Assessment (SEA)/HRA) and as such are not included within this report. However, these assessments will be included as part of the December 2023 update." (pg 1, Annexe 2, Appendix H)In lieu of a complete assessment, a 'High Level Screening' for each option has been provided, detailing the potential for positive and negative impacts across the range of Strategic Environmental Assessment topics. Whilst we welcome the strategic level of detail provided, it is disappointing that South West Water have failed in their statutory duty as Competent Authority by submitting a consultation before the full scheme of options presented within have been fully assessed –particularly where those options are to be included within the Preferred or Best Value Plans.</p>	<p>All supply options identified within the WRMP24 v2 have now undergone full environmental assessment (see Annex 6: Appendix L - P of the SEA Environmental Report - Revision I (Dec 2023)). The SEA Environment Report has been updated accordingly.</p> <p>We will produce additional narrative in an updated WRMP (v3) due for publication in 2024, on how we have used the environmental assessment of our options to inform decision making (please refer to Appendix 6)</p>

<p>Furthermore, whilst the HRA highlights the options within the Best Value Plan that are outstanding in terms of environmental assessment, it is unclear how many of the other outstanding twenty-nine options will make up, or change, the alternative or adaptive plans - "...groupings of options within alternative plans have not been made available by SWW as of the time of writing." (pg 8, Annexe 2, Appendix H)</p> <p>It is the advice of Natural England therefore, that we are unable to provide a full and complete assessment of the revised dWRMP, as the environmental assessment and plan itself are incomplete. - "...at this stage, the WRMP24's compatibility with the statutory protection afforded to Habitats Sites cannot be confirmed as some supply options have not been assessed." (pg 2, Annexe 2, Appendix H)</p>	<p>All supply options identified within the WRMP24 v2 have now undergone full environmental assessment (see Annex 6: Appendix L - P of the SEA Environmental Report - Revision I (Dec 2023)). The HRA has been updated to reflect inclusion of these new options, as detailed in Annex 2: Appendix H of the SEA Environmental Report.</p> <p>Further information can be found in the SEA Environment Report. A cumulative effects assessment has now been completed for all plan-alternatives defined in our October 2023 WRMP24 v2.</p> <p>We will produce additional narrative in the WRMP v3, due for publication in 2024, on how we have used the environmental assessment of our options to inform decision making (please refer to Appendix 6). This update will reconfirm and evidence the options selected in all plan-alternatives assessed.</p>
<p>The HRA concludes that despite not all options having been assessed, South West Water is able to "...ascertain beyond reasonable scientific doubt that the proposed updated dWRMP24 plans ...will not adversely affect the integrity of any Habitats Site, alone or in combination with other plans or projects." (pg 2, Annexe 2, Appendix H)</p> <p>Natural England do not agree with this conclusion.</p> <p>Natural England advise that the HRA conclusion should be based on conclusive evidence of there being no adverse effect on the integrity of Habitats and Ramsar sites. Whilst we welcome the increased level of detail that has been provided with this iteration of the HRA, the conclusions are based on major assumptions that scheme design and operation can overcome any impact on the integrity of the sites.</p> <p>Making such assumptions at plan stage does not give confidence that the Preferred or Best Value Plan can be delivered at project stage, leading to drought options being overly relied upon for security of supply whilst additional modelling and design and mitigation is developed. We recognise that these assumptions may have been made due to the low availability of supporting evidence prior to the plan submission, however this means that the HRA report provided does not meet the tests of the Habitats Regulations and we would be therefore minded to object to the plan should it not be revised in line with our comments before publication.</p>	<p>It is acknowledged that NE is unable to agree that the integrity of Habitats Sites will not be adversely affected whilst the full environmental assessments were not complete.</p> <p>All supply options identified within the WRMP24 v2 have now undergone full environmental assessment. Further information can be found in the Environment Report - Revision I and Annex 2: Appendix H Habitats Regulations Assessment.</p> <p>A cumulative effects assessment has now been completed for all plan-alternatives defined in our October 2023 WRMP24 v2. Refer to the Environmental Report (Appendix 7) for more details.</p> <p>A detailed Mitigation and Monitoring Plan has been prepared which provides: option-specific mitigation; outlines further study and assessments required at the project level; and sets out the monitoring requirements for each option within the BVP (best value plan). Once the WRMP24 is implemented, any further mitigation measures identified during option detailed design and future development will be incorporated through subsequent revisions to the Mitigation and Monitoring Plan. The Mitigation and Monitoring Plan is included within Annex 7: Appendix Q of the SEA Environmental Report - Revision I (Dec 2023) and is available upon request.</p> <p>The HRA has concluded that, at the plan level, and following the implementation of suitable mitigation and the recommendations for additional assessment, there are not anticipated to be any adverse effects on the integrity of Habitats Sites as a result of the plan.</p> <p>A cumulative effects assessment has now been completed for all plan-alternatives defined in our October 2023 WRMP24 v2. Refer to the Environmental Report (Appendix 7) for more details.</p>

<p>Natural England advise 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. 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. This advice is also relevant for the environmental assessment of those schemes from the initial dWRMP24 Preferred Plan, which have been accelerated for delivery in AMP7 – Gatherley Phase 2, COL2 River Camel. Until such time as a full cumulative and in-combination assessment has been carried out, we are unable to agree with the conclusion of the HRA that no adverse effect on integrity is anticipated on any Habitats Site as a result of the WRMP24.</p>	<p>Existing licence information was not available for inclusion within the in-combination and cumulative effects assessments at the time of writing. Therefore, this information has not been included within the latest HRA report: SEA Environmental Report, Rev 1 - Annex 2: Appendix H Habitats Regulations Assessment (00107117-MMD-TN-HRA-009-E).</p>
<p>We take the opportunity to once again 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. Additionally, Natural England note that a monitoring strategy is not an appropriate form of mitigation.</p>	<p>A detailed Mitigation and Monitoring Plan has been prepared which provides: option-specific mitigation; outlines further study and assessments required at the project level; and sets out the monitoring requirements for each option within the BVP (best value plan). Once the WRMP24 is implemented, any further mitigation measures identified during option detailed design and future development will be incorporated through subsequent revisions to the Mitigation and Monitoring Plan. The Mitigation and Monitoring Plan is included within Annex 7: Appendix Q of the SEA Environmental Report - Revision 1 (Dec 2023) and is available upon request.</p>
<p>For the River Avon SAC the amendments must include Habitat Regulations Assessment that gives:</p> <p>An assessment of the existing adverse effects on the River Avon 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).</p> <p>To be clear the assessment must address flow requirements for meeting the River Avon Conservation Objectives⁴ 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) conditions⁵.</p>	<p>Options which interact with the River Avon SAC are either within the BVP (best value plan) (BNW14) or remain as feasible options. It is considered that, at the plan level, all potential significant effects on Habitats Sites have been considered, and indicative appropriate mitigation and monitoring has been identified to protect the integrity of Habitats Sites going forward at the project level. The HRA report (SEA Environmental Report, Rev 1 - Annex 2: Appendix H Habitats Regulations Assessment) contains individual and in-combination assessments of all supply and drought options which are included within the BVP (best value plan), alternative plans and/or adaptive pathways.</p> <p>A detailed Mitigation and Monitoring Plan has been prepared which provides: option-specific mitigation; outlines further study and assessments required at the project level; and sets out the monitoring requirements for each option within the BVP (best value plan). Once the WRMP24 is implemented, any further mitigation measures identified</p>

Further information on the site's conservation objectives on flow and compliance with these flow targets is provided in Annex 4.

The assessment should cover the whole length of the river SAC relevant to impacts from abstraction (not only the WFD lower Avon waterbody 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.

An assessment of the water demands from new development and growth relevant to water supply from the River Avon SAC, including assumptions on water efficiency in new development over time, and how the impact on the River Avon SAC will be mitigated or removed including:

Evidence to show the degree to which abstraction within the proposed cap to existing licences will be implemented to avoid an additional impact on the integrity of the River Avon SAC in relation to the flow targets with development growth.

While the proposed caps reduce the volumes of licensed abstraction, there is a lack of evidence to show that they would positively protect the river against deterioration in meeting the conservation objectives on flow with development growth. Indeed, the proposed licence caps do not provide confidence that they would adequately protect the river against deterioration in meeting the flow targets with development growth as:

the daily average licence cap is derived from total annual abstraction in 2022 which was an unusual year in having an exceptionally hot summer with an environmental drought declared by the Environment Agency. Annual abstraction was above that in other recent years.

the daily average licence cap provides flexibility to take more water in summer at Matchams which would add to flow depletion along several kilometres of river,

the caps are not related to river flow and abstraction volumes disproportionately impact on compliance with the conservation objectives during times of naturally low river flow (<Q95) and river flows approaching low flow.

analysis given in Annex 4 indicates there would remain headroom for increased non-compliance against the site's conservation objectives flow targets.

We suggest the proposed caps should be refined to provide more confidence on the degree to which they would avoid deterioration in meeting the site's flow targets. This may include consideration of:

during option detailed design and future development will be incorporated through subsequent revisions to the Mitigation and Monitoring Plan.

The Mitigation and Monitoring Plan is included within Annex 7: Appendix Q of the SEA Environmental Report – Revision I (Dec 2023) and is available upon request.

Information relating to existing licences, and future development relevant to water supply from the River Avon SAC, was not available for inclusion within individual and in-combination/cumulative effects assessments.

<p>not including environmental drought year abstraction volumes in the derivation of proposed licence caps,</p> <p>capping maximum daily abstraction in relation to flow. For example, abstraction at Knapp Mill did not exceed 20% of flow in any day (other than one day with unreliable data) in the 10-year period 2009/10 to 2018/19 (see Annex 4).</p> <p>capping abstraction at Matchams during summer months (thereby allowing more flow to pass down the River Avon SAC toward Knapp Mill during usually the most critical period for lower river flows and aiding Government policy on nature recovery in respect of chalk rivers through aiding summer flow into naturally developing chalk river bifurcations of the Avon below Matchams).</p> <p>deferring a proposed EA abstraction reduction on the River Stour – this abstraction does not involve a SAC or SSSI but inter-relates with abstraction required at Matchams from the River Avon SAC - of 12 Ml/d when the time limited component of the licence expires in 2028, possibly until delivery of adequate replacement water resource schemes timetabled by 2035 (e.g. BNW6, BNW8 & BNW14) (Sections 5.4.4 & 5.4.6 in revised dWRMP Technical Report).</p> <p>Further stage assessment that brings together expected yields from leakage reduction, water efficiency and demand management activities, metering, supply side measures (before 2035 and including potential deferral of abstraction reduction from the River Stour) and potentially drought planning measures in the Bournemouth Water supply area in so far as they are relevant to water abstraction supply from the River Avon SAC, and transparently shows:</p> <p>how far these measures would meet water demand from new development and growth over time relevant to the area supplied by the River Avon and,</p> <p>headroom for further licence capping on the River Avon before 2035. The objectives for nature recovery in the Environment Act 2021 and Environmental Improvement Plan 2023, set out in Annex 2, are relevant here.</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 to the planning horizon for the WRMP if, after mitigation, there are no alternatives to this abstraction that would remove a negative assessment of impact on the integrity of the site, or the negative assessment can only be removed over very long, possibly multi-decadal, timescales.</p>	
<p>In respect of the Ibsley Lake water supply proposal (BNW14) the amendments must include Habitat Regulations Assessment that:</p> <ol style="list-style-type: none"> 1. Assesses the potential impacts from the input of water into the lake on aquatic conditions (i.e. the ecological state of the water body) that are favourable to the site's bird features e.g. through elevated inputs of nutrients (phosphorus and nitrogen) and raised alkalinity. 	<p>It is considered that, at the plan level, all potential significant effects on Habitats Sites within the ZOI of BNW14 have been considered, and indicative appropriate mitigation and monitoring has been identified to protect the integrity of Habitats Sites going forward at the project level. The HRA report (SEA Environmental Report, Rev 1 - Annex 2: Appendix H Habitats Regulations Assessment) contains individual and in-combination</p>

<p>2. Assesses the potential impacts from fluctuations in lake water levels, caused by the input of water into and abstraction of water from the lake, on conditions that are favourable to the site's bird features.</p> <p>3. Assess the potential impacts from change to the shoreline profile and shallow water habitat availability on conditions that are favourable to the site's bird features.</p> <p>4. Assesses the potential impacts of any water transfer from the lake to the River Avon (for abstraction downstream) from a transfer of invasive non-native species in the lake.</p> <p>These issues are significant in determining whether there is scope for a scheme to be designed and used both for the anticipated water yield and in a manner that is compatible with the conservation objectives for these sites.</p>	<p>assessments of all supply and drought options which are included within the BVP (best value plan), alternative plans and/or adaptive pathways.</p> <p>A detailed Mitigation and Monitoring Plan has been prepared which provides: option-specific mitigation; outlines further study and assessments required at the project level; and sets out the monitoring requirements for each option within the BVP (best value plan). Once the WRMP24 is implemented, any further mitigation measures identified during option detailed design and future development will be incorporated through subsequent revisions to the Mitigation and Monitoring Plan.</p> <p>The Mitigation and Monitoring Plan is included within Annex 7: Appendix Q of the SEA Environmental Report - Revision I (Dec 2023) and is available upon request.</p>
<p>We welcome the removal of this option from the Preferred Plan, however we remain concerned that this option is retained for delivery under AMP7 investment (Chapter 3.2.3, Main Technical Report). This option seeks to install a new abstraction, associated weir, eel screen and pipeline on the River Camel at Nanstallon, extracting up to 90MI/d during high flows for treatment at Restormel WTW. A new abstraction license would be sought for this option.</p> <p>We welcome the increased level of information provided with this iteration of the HRA, and recognise that the conclusions made are based on the preliminary desktop assessment of the most contemporary data, and that the potential for a change in assessment conclusion is anticipated with further modelling. In anticipation of further environmental assessment of this option therefore, we take this opportunity to echo our comments from our May 2023 dWRMP response - as there are existing remedies to remove structures and reduce abstraction in the River Camel SAC, Natural England would be minded to object to any option which prevents recovery of the site to its conservation objectives.</p> <p>No detail has yet been provided regarding the size or scale of the proposed weir associated with this option, however we advise again that 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.</p> <p>Further echoing our comments from our previous response to the dWRMP, Natural England question 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).</p> <p>Again, Natural England advise that South West Water should either drop the scheme, or go through the further tests of the Habitats Regulations, including assessment of</p>	<p>Option COL2 is not being progressed during AMP7. Options which have been accelerated to AMP7 are not included within the WRMP24 v2 and therefore are not relevant to this HRA. The WRMP24 only considers the period from AMP8 onwards.</p> <p>Option COL2 is not included within the BVP (best value plan), alternative plans and/or adaptive pathways and so such detail on this option has not been included within the SEA Environmental Report, Rev I - Annex 2: Appendix H Habitats Regulations Assessment. However, this option remains on the feasible list and therefore individual assessments can be provided upon request, if required.</p>

<p>alternatives. Please refer to Annex 2 where the legislative tests are set out for ease of reference.</p>	
<p>South West Water have been responsible for the water supply on the Isles of Scilly since 2020. In response to water quality improvement notices issued by the Drinking Water Inspectorate (DWI) in 2023, South West Water confirmed their intention to install new desalination modules on 5 islands (St Mary's, Tresco, Bryher, St Agnes and St Martins) and a new borehole on one (St. Mary's). Despite an initial meeting in August 2023, in which South West Water outlined draft plans for plant location and pipework, we have had no further information regarding the developing proposals. Proper siting, design and monitoring are crucial in minimizing the impacts of desalination on protected habitats, including the Special Areas of Conservation (SAC), Special Protection Areas (SPAs), Marine Conservation Zones (MCZs) and Sites of Special Scientific Interest (SSSIs) of Scilly. We are therefore disappointed that given the proposed delivery of these options is cited as 2024, the revised dWRMP holds no HRA assessment of the plan for the Isles of Scilly WRZ.</p>	<p>The development and delivery in AMP7 of new reverse osmosis water treatment works will include the use of desalination for all islands. This will reduce dependency on groundwater abstractions alone which will support achieving a Sustainable Abstraction position across the islands. Our groundwater monitoring plan will provide the evidence basis to support the renewal of the groundwater licences in 2030 in collaboration with the Environment Agency.</p> <p>The delivery of the AMP7 work will result in the Islands having a resilient supply of water through the planning period without further options being required. Therefore, the Isles of Scilly options have been removed from the WRMP24 v2 and as such are no longer included within the SEA Environmental Report - Revision I (Dec 2023) or supporting documents.</p>
<p>The SEA of the February 2023 dWRMP24 noted that further modelling work was being conducted to inform a future iteration of the SEA. Section 1.5.2 of the October 2023 SEA states that "All outstanding SEAs technical environmental assessments (HRA, WFD, INNS, BNG and NCA) and cumulative effects assessment of the alternative plans and review of the preferred plan will be undertaken and provided to support SWWs SoR, December 2023.". Natural England are unable therefore, to provide a complete assessment of the dWRMP SEA as it is still incomplete. As noted above, it is the advice of Natural England that the Statement of Response is not a suitable method of issuing a 'final' draft WRMP as it does not provide a statutory means of consultation.</p> <p>Whilst we welcome the environmental assessment summary provided in Appendix 4.2, we note that the SEA summary references the post-mitigation, 'residual effects' scoring for each option. This is misleading, as it presents a more positive snapshot of the environment impacts from each option prior to any mitigation being agreed or without appropriate supporting evidence.</p> <p>The mapping provided in Annex 1:D does not deliver sufficient level of detail to determine whether all relevant designated sites have been screened into the assessment. Additionally, no marine designations have been included.</p>	<p>Our updated Appendix 7, comprises completed environmental assessments of all feasible options and the cumulative effects of our Plan-alternatives; we acknowledge that without this information you have been unable to fully assess and respond to our October 2023 WRMP v2 submission.</p> <p>The full SEA assessments can be found within Annex 6: Appendix L - P of the SEA Environmental Report - Revision I (Dec 2023). The assessments present the pre-mitigation effects as well as presenting the corresponding narrative associated with these effects. It is anticipated that mitigation will be required and implemented for options through environmental legislation and planning regulations. A detailed Mitigation and Monitoring Plan has also been prepared which provides option-specific mitigation, and outlines further study and assessments required at the project level (Annex 7: Appendix Q of the SEA Environmental Report - Revision I, available upon request).</p> <p>Our Appendix 4.2 was written as a summary of each option, to help our stakeholders to gain a broad understanding of all the feasible options and the key features (benefits and impacts) of each. We have reviewed the potential mitigation for inclusion in the options. The post-mitigation effects (residual effects) therefore reflect the expected outcomes of each option.</p> <p>The HRA (Annex 2: Appendix H of the SEA Environmental Report - Revision I) does screen in all potentially affected Habitats Sites, including marine SPA and SAC sites. The SEA assesses further sites including MCZ and MPAs within Objective 1.1. Option-specific maps cannot be publicly provided at this stage due to security restrictions. Regulators may make a request for option-specific maps to be provided, where available.</p>

<p>Halting reservoir compensation flow has the potential to lead to changes in downstream soil moisture levels and habitat conditions. Without sufficient flow soils may become drier and habitats that rely on water flow could be negatively impacted to by the altered hydrological conditions. We are unable to comment on the environmental assessment of those options which seek to make changes to compensation flow as they have not been completed by South West Water. We take this opportunity therefore to highlight that any environmental assessment needs to consider how cessation of compensation flow will impact soils and habitats downstream of the reservoir, including any areas of peat which are hydrologically connected to the associated river system. Of particular note is drought option 'dCS11/E - Siblyback not releasing compensation flows when making supply releases'. Draynes Wood SSSI, a damp wooded gorge on the River Fowey, is located approximately 2km downstream of Siblyback Lake. Draynes Wood SSSI is of particular importance as one of Cornwall's richest sites for lower plants and may be impacted by changes in water availability.</p>	<p>All supply options identified within the WRMP24 v2 have now undergone full environmental assessment. Further information can be found in the Environment Report - Revision I (Dec 2023) with full SEA option assessments found in Annex 6: Appendix L - P.</p> <p>Soils and habitats are assessed as part of the SEA process. It is acknowledged that NE have identified the Draynes Wood SSSI as having potential effects on drought option dCS11/E. It is noted that that potential effects on this designated site may be further examined and where necessary updated in assessment. It should be noted that this option is not within our preferred plan.</p> <p>The options that consider the halting of reservoir compensation flows are proposed only when a reservoir is making additional supply releases. The supply releases are typically larger than natural summer flows which means that making compensation flows in addition moves the flow regime further away from a natural position between our reservoirs and water treatment works. Downstream of our water treatment works, once the supply releases have been abstracted, the reaches will be more depleted due to the halting of compensation releases. However these areas are typically larger river channels with larger flow volumes where the habitats are less reliant on the compensation releases.</p>
<p>We take this opportunity to reiterate our advice from our May 2023 response to the dWRMP -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.</p> <p>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. We are pleased to note that a groundwater monitoring programme has been agreed with the Environment Agency (pg 82, Main Technical Report), however without provision of conclusive evidence we cannot agree with the assertion of the SEA that significant environmental impacts are not anticipated, or that best practise construction methods will be sufficient to offset any negative environment impacts from the options (Annex 6: Appendix P).</p>	<p>The development and delivery in AMP7 of new reverse osmosis water treatment works will include the use of desalination for all islands. This will reduce dependency on groundwater abstractions alone which will support achieving a Sustainable Abstraction position across the islands. Our groundwater monitoring plan will provide the evidence basis to support the renewal of the groundwater licences in 2030 in collaboration with the Environment Agency.</p> <p>The delivery of the AMP7 work will result in the Islands having a resilient supply of water through the planning period without further options being required. Therefore, the Isles of Scilly options have been removed from the WRMP24 v2 and as such are no longer included within the SEA Environmental Report - Revision I (Dec 2023) or supporting documents.</p>
<p>A full in-combination or cumulative assessment of the dWRMP has not been provided for this dWRMP consultation, only the preferred and adaptation plan has been assessed (pg 5, Appendix 7: SEA) Natural England advise that the full, cumulative</p>	<p>A full intra and inter cumulative effects assessment has been undertaken for the BVP (best value plan) and the Least Cost Plan. The Best for Society and Environment Plan and Ofwat's Core Pathway are noted to be consistent with the BVP and as such have not been assessed separately. A high level intra-cumulative effects assessment of the Adaptive Pathways (Medium and High) has also been undertaken. Cumulative effects</p>

<p>effects of the plan must be considered before publication to ensure the WRMP24 is compliant with the legal requirements of the SEA.</p>	<p>can be found in Chapter 10 of the Environmental Report - Revision I (Dec 2023). All supply options identified within the WRMP24 v2 have now undergone full environmental assessments which can be found within Annex 6: Appendix L - P of the SEA Environmental Report.</p>
<p>This options seeks to increase abstraction from the River Otter, offsetting the increased take with the import of treated effluent water from Sidmouth WwTW. This option is part of the 'Adaptive Pathway – Medium', therefore has the potential to be delivered as part of the WRMP24. Although acknowledging that this option may impact water quality due to the discharge of treated effluent water into the River Otter, the report provides no further detail of the quality of the water to be discharged. Downstream priority habitats and protected sites – Otter Estuary MCZ and SSSI –need to be considered within the environmental assessments to understand the impact from treated effluent water on the aquatic environment and surrounding, linked habitats.</p>	<p>This option will not increase our abstraction on the River Otter compared with our WRMP baseline position including the assumptions on licence capping and Environmental Destination.</p> <p>The SEA and HRA have been undertaken using the information available at the time of writing. Water quality and the effects on ecological sites are assessed under SEA Objectives 2.1 and 1.1 respectively, supported by the WFD and HRA assessments. Option-specific SEA information is presented in Annex 6: Appendix L - P of the Environmental Report - Revision I (Dec 2023). The HRA and WFD can be found in Annex 2: Appendix H and Annex 3: Appendix I of the SEA Environmental Report respectively.</p>
<p>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>SEA assessments are a high-level environmental assessment at the strategic plan level. As options are developed and the designs further defined, including the exact nature and location of above-ground infrastructure, further option-specific mitigation will be developed.</p> <p>At this stage, the SEA identifies the potential for effects, and provides mitigation that is often generic in nature due to the early stage of option development. The Mitigation and Monitoring Plan includes option-specific mitigation measures. It is included within Annex 7: Appendix Q of the SEA Environmental Report - Revision I (Dec 2023) and is available upon request.</p>
<p>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. The assessments consider priority habitats and species, however as all options have not been fully developed or assessed, it is unclear whether all the potential impacts have been identified and therefore whether any proposed mitigation or monitoring is sufficient, or whether any potential net gain will be realised.</p>	<p>All supply options identified within the WRMP24 v2 have now undergone full environmental assessments, including NCA / BNG assessments (where these have been scoped in). Further information can be found in the Environment Report - Revision I (Dec 2023), Annex 4: Appendix J - NCA and BNG Technical Note. A detailed Mitigation and Monitoring Plan has been prepared which provides: option-specific mitigation; outlines further study and assessments required at the project level; and sets out the monitoring requirements for each option within the BVP (best value plan), including requirements for BNG implementation and monitoring.</p> <p>The Mitigation and Monitoring Plan is included within Annex 7: Appendix Q of the SEA Environmental Report - Revision I (Dec 2023) and is available upon request.</p>
<p>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,</p>	<p>All of the options will undergo further studies and assessments as options develop. The SEA is strategic in nature and is a high-level environmental assessment at the plan level, not the project level. On-site project-level studies and assessments (including all appropriate protected species assessments) will be undertaken according to the statutory requirements as options are brought forward for more detailed development.</p>

the authority (or the undertaker in regards of the exercise of permitted development rights) should undertake further consultation with Natural England. 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.

We have noted your recommendation that as part of future studies, species abundance should be considered.

We are fully committed to meeting our statutory duties in relation to the environment and this includes our species and habitat conservation (nature protection and recovery) duties. We published our updated Biodiversity Strategy in 2023 and are currently working to ensure that we meet all of our duties in relation to Biodiversity Net Gain, Nature Recovery and the new Biodiversity Performance Commitment.

ID Reference: S06 National Trust	
Feedback	South West Water Response
<p>Whilst we do not have any additional points to those set out in our letter dated 5th May 2023, we wish to emphasise that there are areas of National Trust land potentially affected by the options and schemes set out in the dWRMP, and as such we would encourage early engagement with the Trust by any water resource asset developer, including to discover whether any “inalienable” land might be involved in some way.</p>	<p>Full responses to the spring 2023 consultation have now been published in the WRMP SoR (Statement of Response). Responses to consultation comments specifically related to the SEA have been finalised within Annex 8: Appendix R of the SEA Environmental Report - Revision I (Dec 2023). Appendix R can be provided on request.</p> <p>The following National Trust sites listed in the representation have been reviewed in the SEA:</p> <ul style="list-style-type: none"> - COL15 - Lanhydrock Grade I Listed Building (LB) & II* Registered Park and Garden (RPG). - WIM12 - Knightshayes Court Grade I LB & II* RPG. - WIM6 - Knightshayes Court Grade I LB & II* RPG. - WIM15 - Knightshayes Court Grade I LB & II* RPG. - BNW6 - Kingston Lacy Grade I LB 'Treasure House' & II* RPG. - BNW6 - Holt Heath and Forest (part of Kingston Lucy estate). - BNW6 - Ibsley and Rockford Commons. - Godolphin Grade I LB & II* RPG - no nearby options identified. <p>Potential effects on these National Trust heritage assets have been reflected within the SEA assessments and updated where required, to ensure they are captured and fully assessed. Full SEA option assessments can be found in Annex 6, Appendices L - P of the SEA Environmental Report - Revision I (Dec 2023).</p>

ID Reference: S03

Wildfish

Feedback

WildFish is concerned that no mitigation plan for BNM has been included in South West Water's revised dWRMP - to cover a scenario where one or more of its proposed supply solutions become undeliverable. To ensure that supply solutions are delivered as soon as practicable, for the Avon SAC, South West Water should be progressing alternative supply solutions to avoid significant delays if core resource options fail. There is no clear evidence of this, with only four 'feasible' resource options included in South West Water's planning tables. Two out of the four are drought permits and no environmental assessments have been included in the revised plan for one of the other two options.

South West Water Response

Our Preferred Plan has undergone robust modelling to ensure the supply/demand balance is met. We have included two Adaptive Pathways within the WRMP24 v2. These pathways (medium and high) introduce additional supply options to account for changes in the future regional water demand, for example, if population increases significantly more than expected.

Plan appraisals and cumulative assessments have been undertaken and presented within Chapter 10 of the SEA Environmental Report (Appendix 7) - Revision 1 (December 2023).

We are developing our Bournemouth strategy and wider Hampshire Avon strategy in collaboration with Wessex Water to enable a regional solution. We are looking to develop this as an adaptive solution and we will include further narrative in Appendix 6, our decision-making approach and our plan-alternatives and adaptive pathways.