

AffinityWater

Drought Plan Strategic Environmental Assessment – Environmental Report Appendix H



Affinity Water



Contents

H. Environmental Report Consultation Log	4
--	---

H. Environmental Report Consultation Log

		Environmental Report - Assessment	22	In 5.2.3.2 the FUL permit is given a moderate negative effect, while other permits that include an increase in discharge that could affect a SSSI are given minor negative effects. It is not clear why the FUL permit has been given a higher severity rating on the assessment scoring criteria given. An negative impact on a SSSI through a moderate negative impact.	The reference to moderate level minor to minor effects on SSSIs are taken directly from the CARs. Each of the drought permits are given an overall moderate negative effective mitigation and minor negative point mitigation (see Table 5.1). Additional reference to the CARs will be summary level of the effects in Section 5.2.3.2 to the additional mitigation requirements.
		Environmental Report - Cumulative Assessment	23	It is not clear why the assessment of cumulative impacts regarding any permits which could theoretically be issued at the same time or in succession. Natural England agrees that you think it is unlikely that the worst case options would be used together and that you would only do the detailed assessment and update the CARs if required, but it is important to have a high level understanding of the risks so you can plan and prioritise accordingly. If there is a risk, there may be measures you could take in advance of a drought to mitigate any impacts, and make the environment more resilient. This could be achieved by making it more likely that using options concurrently would be acceptable, should that need arise.	The Environmental Report has now included a high level assessment of potential cumulative effects based on the information presented within the CARs. The Cumulative assessment considers where the drought permits in the South East respect the same reaches and therefore identifies the potential for effects in relation to collection of groundwater, flow and Abstraction, and on the water environment. The assessment already identified that there is not anticipated to be significant effects identified within the individual drought permits CARs. SSSI as it is unlikely there would be any additional effects to the significant effects identified within the individual drought permits CARs. SSSI and SSSI are both located within dry valleys and it is likely there will be dry during periods of drought and as such there is not anticipated to be cumulative effects. The site is not a GWGTE and the South East CAR 2016 confirms that terrestrial vegetation at the site would mainly be dependent on local groundwater levels and these would likely be low during implementation of the drought permits. However, it should still be noted that the implementation of the permits in the South East are not likely to be required and the cumulative implementation is also not likely to be required. However, this situation does arise while Ability Visitor need to apply, the CAR will need to be updated.
		Environmental Report - Mitigation	24	You have identified that in-stream measures and adjustments to improve habitat conditions are potential mitigation options. Such works could be planned and delivered in advance of drought, to help make it more likely that drought permits options will be acceptable and reliable during drought. We encourage you to think about this as much as possible, and consider whether such habitat enhancement work programs could be incorporated into the WINEP for PGAs.	There is reference to the WINEP for PGAs and the delivery of projects to improve ecological health including those commitments presently reflected by drought permit options will help to improve natural resilience and in turn will support resilience to any impacts from drought permits. Added text to reference the delivery of in-stream measures to be delivered as part of this programme.
		Environmental Report - Assessment	25	Response required to permit to that an assessment of what effects have been identified and what their impact on SSSI features is likely to be. Natural England is pleased that SMP will be carried out on a precautionary basis prior to the implementation of the drought permit. This will allow more accurate baseline data for future monitoring after implementation to be compiled against.	Noted. No action required.
		Environmental Report - Appendix A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z	26		Noted. No action required.
	04/08/2022	Environmental Report and Description	27	Natural England finds the SEA environmental report sufficiently precautionary and having sufficient detail.	Noted. No action required.
		Environmental Report - Historic Environment	28	As a summary, we are concerned that potential impacts on the historic environment are largely dismissed in the Strategic Environmental Assessment Environmental Report, without clear and concrete justification.	Noted. Additional responses provided below.
		Environmental Report - Historic Environment	29	We therefore suggest that the assessment is revisited to carefully consider the potential implications for the historic environment (both designated and non-designated), if the work has been done, to better establish how these issues have informed the assessment.	Additional detail has been included in regards to the historic environment. This includes information from the CARs which reviews heritage assets within the water study area. Areas at drought permits, it was determined that there would not be any additional impacts as a result of the drought permit of implementation therefore the assets were not considered to be sensitive. The overall conclusions have remained neutral at this stage. However, the additional potential effects identified by Historic England from the consultation response are now recognised within the assessments. These effects are addressed on this stage and it is recognised that further baseline collection and assessment is required at a more detailed stage.
		Environmental Report - Historic Environment	30	Historic England recommends the collection and assessment of specific baseline information which could include identifying the potential for buried, waterlogged or buried and partially submerged remains of significant interest and highlights that can be associated with river valleys, floodplains, estuaries, coastal and wetland areas, including sites, high ground and other features. Although it may be appropriate for this evidence gathering and assessment to take place in the more detailed declassification stage, it is important to raise these issues and suggest how they might further divert the line, be located as the consideration of waterlogged archaeology may be costly to deal with and deep floodplain, estuarine and coastal deposits difficult to evaluate by standard techniques.	It should also be noted that drought permits will be implemented in severe drought conditions and the additional impact of the drought permits on these assets is not likely to be significant. However, this will be explored further at a more detailed stage as required. As outlined above in (Comment EY 26), the SEA now recommends further baseline collection and assessment is undertaken at a more detailed stage to determine the additional potential effects. It should also be noted that drought permits will be implemented in severe drought conditions and the additional impact of the drought permits on these assets is not likely to be significant. However, this will be explored further at a more detailed stage as required.
Historic England	13/05/2022				