



Affinity Water Drought Plan

Strategic Environmental Assessment
Environmental Report Appendix B

June 2022

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Contents

B. WRMP24 Scoping Report Consultation	3
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B. WRMP24 Scoping Report Consultation

Organisation comment received from	Date comment received	Affinity consultation question / Section of SEA scoping report comment refers to	Comment ID	Comment	Drought Plan Response
Environment Agency	27/09/2021	Has the water company correctly determined the requirement to carry out an SEA?	1	Affinity Water have determined that an SEA is required for the Affinity Water WRMP 2024. The Scoping Report is the first part of this process, and fulfils the requirement to consult statutory consultees.	No action is required for the Drought Plan.
		Has a Strategic Environmental Assessment been carried out?	2	The SEA Scoping Report is the first stage of the SEA	No action is required for the Drought Plan.
			3	The SEA study area has been considered as the Affinity Water WRMP2024 supply area, with Figure 2.1 showing the Affinity Water area covered. Section 7.4. indicates that a buffer will be applied to the GIS with regard to baseline.	No action is required for the Drought Plan.
		Does the Scoping Report outline an appropriate study area and baseline?	4	The baseline summary is good and is specific to the Affinity Water area. For some of the topics there is some analysis of the pressures on baseline receptors, this would have been useful to provide for all topics e.g. biodiversity info given but no information on the pressures currently e.g. habitat fragmentation, development, etc.	Pressures added where information is available. SSSI site condition assessment included and reference to the vulnerability of Priority Habitat to climate change is included. Pressures on water environment (water management issues) is already included within the baseline.
			5	Future baseline is presented, with an analysis of potential future pressures on the baseline receptor given.	No action is required for the Drought Plan.
		Does the Scoping Report identify key issues and provide those scoped in/out?	6	Topics have been scoped in/out explicitly with a description as to the issues and opportunities related to the topic. The issues and opportunities relate to the baseline and PPP review and the pressures in relation to the WRMP24 have been discussed.	No action is required for the Drought Plan.
			7	Where flood risk reduction or mitigation is discussed it would be good to include consideration of nature based solutions.	Reference to nature based solutions added in relation to flood risk.
			8	Air quality - include the role of vegetation in managing air quality.	Reference to the role of vegetation in managing air quality added within key opportunities.
		Does the Scoping Report include a PPP review and has this fed through into assessment methodology?	9	Yes a PPP review has been undertaken to inform the SEA scoping and has contributed to the assessment framework, with a summary in Chapter 3 and the full review in Appendix A. Extensive list provided, although some quite dated.	No action is required for the Drought Plan.
			10	Could include Our plan to rebuild : The UK Government COVID19 recovery strategy (2020), Build Back Better (2021) and The Clean Growth Strategy (BEIS, 2017). Note also that Flood Risk Management Plans are not included, and that both the FRMPs and RBMPs are being updated.	PPP review updated to include suggested policies/strategies.
			11	Yes Chapter 5 sets out a proposed methodology, and it is good to see how the regional planning assessments will feed into the WRMP SEA. The SEA Framework and methodology align with that of the Regional Plans. The methodology appears adequate and covers the key aspects. It is good to see that influence on options development has been considered and how the other environmental assessments will feed in.	No action is required for the Drought Plan.
		Does the Scoping Report set out a proposed SEA assessment methodology?	12	More discussion on using the assessment objectives to discuss alternatives would be welcomed.	No action is required for the Drought Plan. The SEA involved a two phased process. Phase One involved a preliminary assessment of an unconstrained list of drought permit options to identify options within high environmental risk and/or operational constraints. This process allowed for the identification of the constrained list of drought permit options which are taken through into the Drought Plan and then were subject to full SEA.
			13	It is good to see consideration of biodiversity net gain, natural capital, etc.	No action is required for the Drought Plan.
Customer Challenge Group (CCG)	15/09/2021	Assessment criteria	14	They are clear and appropriate insofar as minimising negative impacts are concerned but stop short of inviting opportunities for improved outcomes vs status quo. For example, building a reservoir could, in theory, include walking and cycling trails. We might like to make space for thinking about how our decisions could result in positive outcomes beyond those associated directly with the supply of water.	No action is required for the Drought Plan.
Historic England	16/09/2021	Environmental baseline	15	Recognition of Historic Environment Records (HERs) and the potential for new archaeological discoveries in 4.2.22 is welcomed. In fact all of England is covered by HERs and it would be helpful to identify those that cover Affinity Water's operational area. This information is available on the Heritage Gateway. Particularly for archaeology, non-designated heritage assets are much more common than designated assets so the suggestion that there are 'hundreds' of assets on HERs in Affinity's area will be a gross under-estimate. Most of the HERs in Affinity's area maintain some form of alert map system to identify known archaeological assets or areas of potential. We recommend contacting each HER to assess the resources available and relevant to Affinity's operations.	No action is required for the Drought Plan.
		Key issues and opportunities identified	16	For archaeology the key issue is to have an established procedure and expertise to identify and manage potential impacts. Our experience is that Affinity is some way behind industry best practice in this respect. The company does not normally contact HERs for information or to discuss projects and it is almost impossible to contact anyone with environmental management responsibilities. The key historic environment priority for Affinity should be to put in place transparent and effective procedures for consulting and working with key stakeholders on archaeological matters and the wider historic environment. In addition to direct physical impacts from projects, Affinity should consider if water abstraction is putting any waterlogged archaeological sites at risk.	Added risk of water logged archaeological sites to key issues table.
		SEA Objectives	17	The aspirations look good, it's the reality of delivering on them that needs addressing.	No action is required for the Drought Plan.
		All	18	These comments are from the Greater London Archaeological Advisory Service (GLAAS). Whilst our remit is in Greater London the points raised in this response are likely to be relevant across Affinity Water's operational area. We suggest that a meeting with local government archaeologists (HERs) would be useful to help the company address the points raised and would be willing to help facilitate this.	No action is required for the Drought Plan.
		Environmental baseline	19	The baseline maps (Appendix B) are high level, and do not include National Parks, Marine Conservation Zones (MCZs) or National Trails, all of which could be useful in the environmental assessment.	No action is required for the Drought Plan. The options included within the Drought Plan are not within or within close proximity to National Parks. There are no likely effects identified for MCZs or National Trails as a result of the Drought Plan options.
			20	It would be useful to include a list of all the nationally important designated sites along with their current condition in the environmental baseline. Such information will be needed to inform the later environmental assessments.	Where the drought permit options assessment identified an effect on a SSSI, their condition assessment is presented within the individual options assessments sheets.
		Key issues and opportunities - Table 5.1 - Biodiversity, Flora & Fauna	21	Natural England is pleased to see opportunities that support the 25 year environment plan Biodiversity net gain, nature recovery networks and priority habitats and species are recognised	No action is required for the Drought Plan.
			22	More priority habitats such as rivers and lakes could be affected by abstraction rather than just wetland and marsh as mentioned in the table	Expanded to reference that priority habitats, other habitats and species rely on water.
Key issues and opportunities - Table 5.1 - Climatic Factors	23	Natural England is pleased that options to reduce abstraction will be considered as well as mitigation. Alternatives to increasing abstraction should be included whenever possible.	Added reference to implementing demand management options to reduce the need or amount required via abstraction under key opportunities. The Drought Plan will implement drought permits as a last resort.		
	24	The impact of climate change on biodiversity should be investigated as it is important to understand how climate change will affect the resilience of wildlife. Climate change could make wildlife more vulnerable to the pressures and impacts of water company activity so should be included in the implications column. Natural England is pleased to see that increasing environmental resilience is mentioned in the opportunities column. This could include improving habitat quality and connectivity, and should go beyond considering opportunities for carbon sequestration.	Added reference to climate change related risks in relation to biodiversity under key issues.		
	25	Every opportunity to increase the resilience of habitats and species to climate change should be included.	Additional opportunities added in relation to increasing the resilience of habitats and species to climate change		
Key issues and opportunities - Table 5.1 - Landscape	26	The implications and opportunities for landscape are well described, including the importance of working with stakeholders in the development of landscape mitigation and enhancement projects.	No action is required for the Drought Plan.		
	27	Natural England would advise you include the National Parks and Access to the Countryside Act 2008 for all relevant options and projects.	Added to PPP review		
	28	When flood risk and water level management may impact on protected sites the options should be considered in the biodiversity or landscape assessments.	No action is required for the Drought Plan.		

Natural England	17/09/2021	Key issues and opportunities - Table 5.1 - Water	29	Many designated sites have condition targets for nitrogen as well as phosphorus pollution so the options' effects on nitrogen pollution should also be considered.	The options assessments do not go into that level of detail at this stage. The options within the Drought Plan are not anticipated to have a significant effect on air quality given the nature of the options.
			30	Where a risk is identified to water quality and flooding, nature based solutions should be prioritised in mitigation due to the benefits in environmental resilience they bring.	Nature based solutions for mitigation will be identified as part of the assessment process where relevant. However, given the nature of the options, it is not identified to be as relevant for the Drought Plan.
		SEA Framework	31	Table 6.1 which sets out WRSE, WRE and Affinity WRMP24 objectives is set out well and easy to follow.	No action is required for the Drought Plan.
		SEA Framework - Biodiversity, Flora & Fauna	32	The SEA assessment questions include consideration of effects on nationally and internationally important designated sites, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, Sites of Special Scientific Interest (SSSIs) and Marine Conservation Zones (MCZ). This is good. However, we recommend that the first question is re-worded to say 'Is the option likely to affect the conservation status of any SPA, SACs, Ramsar sites and MCZ, undermine or prevent restoration of SSSI condition or affect the condition of locally designated sites?'	Assessment question to be re-worded as per suggestion.
			33	BAP habitats and species are more strictly referred to (under Section 41 of the NERC Act) as habitats and species of principal importance for the purpose of conserving biodiversity. For simplicity they are commonly referred to as Priority Habitats and Species.	Replaced within Priority Habitats and Species.
		SEA Framework - Climate Change	34	Natural England recommends the assessment criteria questions the resilience and vulnerability of different species and habitats to climate change, for example "Does the option enable or reduce the potential of water dependent wildlife to adapt to climate change?". The assessment criteria should also explore every opportunity to improve resilience within the scope of the project. This could fit under either the climate change or biodiversity topics.	Effects of options on the resilience of the natural environment to climate change effects is considered within the SEA. Additional assessment question included to make this explicit.
		SEA Framework - Water quality and soil	35	The assessment criteria should evaluate the potential effects on soil and water quality on protected sites. The SSSI citations, site conservation objectives, favourable condition tables (FCT) and condition assessments should also be used to determine which protected sites are most at risk.	The assessment takes this into account but an additional assessment question included to make this explicit. SSSI site condition is considered directly in the SEA and as part of the SEA option assessment. Added SSSI conditions assessments to Assessment Criteria in Appendix E.
		Proposed approach to the SEA	36	The review of impacts on designated sites (including SPAs, SACs, Ramsars, SSSIs, MCZs, AONBs and National Parks) should focus on the features for which those sites were designated, the objectives for the sites, and current condition. SSSI citations, site conservation objectives, favourable condition tables (FCTs) and condition assessments can be viewed online on the Designated Sites View database.	Added in wording to Section 4.4.1 to state that the HRA considers the features, objectives and conditions and that has informed the SEA. Added SSSI condition assessments to Assessment Criteria in Appendix E.
37	The Assessment Scoring Criteria (Appendix E) should consider the value of the receptor, as well as the degree of impact. For instance, impacts on nationally or internationally designated sites should be given more weight in the assessment than impacts on sites with local designations. Current site condition should also be taken into account. For instance, any amount of loss of the qualifying features of an SAC or SPA should be considered a major negative effect. And where such a site is failing its conservation objectives, even a small negative effect that would compound that failure should be considered a major impact.		Added in wording around how the scoring definitions consider the receptor and impacts to allow differentiation between the eight point scoring scale.		

