

Appendix 26: Natural England

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1.1	Representation	Natural England acknowledges the amendments which have been made within the rdWRMP19 HRA to address the comments we made on the first dWRMP19 (our ref: 248281, 08/06/2018).
	Our Response	We gratefully received the comments and similarly believe the collaborative working between Affinity Water and Natural England has been beneficial to the quality of final WRMP, HRA and SEA documents.
	Summary of any change to our final WRMP	N/A
1.2	Representation	Some of the conclusions made in Table 5-1 should be updated, as they may have information missing. For example: AFF-CTR-WRZ4-4001: Egham to Iver lists an incorrectly named SAC (Wormley-Hoddesdonpark Woods SAC), it is further from the SAC than is quoted in the LSE screening and it should also include the SW London waterbodies SPA/Ramsar & Windsor Forest and Great Park SACs.
	Our Response	We have updated Table 5-1 to include the correct SAC name and the LSE screening has been reviewed to determine distance from SAC, as well as the additional SAC and SPAs.
	Summary of any change to our final WRMP	N/A
1.3	Representation	Further to the above (1.3), and more generally speaking, Table 5-1 would benefit from some extra detail in relation to how the conclusion of no LSE has been reached.
	Our Response	We have further updated Table 5.1, where we have provided additional text to substantiate (where applicable) the LSE conclusions with reference to the hydrological connectivity and other potential impact pathways.
	Summary of any change to our final WRMP	The HRA document has been updated to reflect these changes.
1.4	Representation	<p>We would advise the following be considered within the HRA's appropriate assessment in relation to AFF-RTR-WRZ1-4010: Abingdon Reservoir to Harefield Transfer (50MI) & AFF-RTR-WRZ4-4011: Abingdon to Iver 2 (50MI/d):</p> <ol style="list-style-type: none"> 1. The gravel and continuity with the groundwater aspect of this site is discussed in the HRA, but a conclusion of no adverse effect on integrity has been reached due to the assumption that the water table would not be high enough to be impacted by the pipework which is required as part of the options delivery. This assumption is not certain as reflected by the inclusion of a caveat to assess potential dewater in future planning. Resultantly, in Natural England's view, the conclusion of no adverse effect on integrity is not certain and therefore mitigation measures should be proposed. 2. At the plan level, we would suggest that a 'desk-based' type study of the general local geology/hydrogeology is undertaken to develop a more robust assessment of groundwater levels and how they may be affected. 3. The HRA should clarify that Wraysbury No 1 Gravel Pits SSSI is a component part of the South West London Waterbodies SPA, and that the HRA is only

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		<p>assessing SPA interest features (and not other features for which the SSSI is designated).</p> <p>4. The mitigation suggested is quite broad and high level, which is understandable given the large-scale plan, however, Natural England advises this is expanded on, for the sake of robustness and to demonstrate that it is achievable. E.g. Explain how mitigating excess noise can, theoretically, be achieved. Include a list of caveats which would need to be met if construction works are to take place during the over-wintering season (March-October), and state that if that if these caveats are not met, works should be avoided at this time, of disturbance is, and whether further increasing local noise levels or introducing different patterns of noise will result in bird disturbance. There has been no comparison between the current baseline.</p>
	Our Response	<p>We have updated the HRA Report to provide more evidence to support the assessment of no LSE in respect of points (1) and (2) including reference to local groundwater level information. We would like to discuss this further evidence with Natural England to explain the assessment.</p> <p>Point 3) has been addressed and the clarification will be provided in the updated HRA report.</p> <p>With reference to point 4) the HRA Report has been updated to include the following:</p> <ul style="list-style-type: none"> a) how mitigating excess noise can be achieved b) the inclusion of caveats as to when any winter working would be prohibited [based on noise thresholds agreed with NE] c) a clarification of the use of BS5228 as being a source of noise mitigation measures only and not a source of required noise standards [which are already clearly stated as being derived from published research on noise effects on birds]. d) added in text to recognise that as part of the project-level HRA, noise surveys will need to be carried out of the baseline, existing noise levels and patterns that can then be compared with the predicted construction noise levels and patterns once these have been confirmed by the contractor who we appoint to deliver the work and the final construction details are confirmed. Affinity Water will consult with Natural England on the findings of these surveys and the detailed construction assessment and agree any required mitigation measures and noise thresholds that cannot be exceeded.
	Summary of any change to our final WRMP	The HRA document has been updated to reflect changes and includes a commitment to continued dialogue with Natural England.
1.5	Representation	It is likely that options 4010 and 4011 will require new infrastructure in close proximity to the South West London Waterbodies SPA. The HRA should include an assessment of any physical impacts which could arise from construction and operation of infrastructure. e.g. impacts from dust/ polluted run-off etc and explain how these could be mitigated against.
	Our Response	We believe these points have been addressed in Section 6.1.1 of the original HRA. Some additional text has been added to Section 6.1.1 in order to provide further clarification, including a commitment to ensure that all construction work will be carried out in accordance with industry best practice mitigation measures for water pollution control and dust suppression. Monitoring of compliance with best practice measures and regulations will be carried out by an Environmental Clerk of Works appointed by Affinity Water to ensure all agreed mitigation measures are adhered to.
	Summary of any change to our final WRMP	More detail has been added to the HRA to support the existing points in Section 6.1.1.

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1.6	Representation	The SEA is logically presented, with baseline information, and explanation of how the SEA informed the selection of options in the rdWRMP19, key impacts identified in the preferred and alternative plans, and a summary of the assessment of in-combination and cumulative effects.
	Our Response	We recognise this positive response from Natural England with respect to our SEA and will maintain the same structure for the fWRMP19 version of the SEA.
	Summary of any change to our final WRMP	N/A
1.7	Representation	The SEA identified a potential negative impact on biodiversity associated with the AFF-RES-WRZ4-0832 Brent Reservoir option. Natural England strongly recommends that Affinity Water looks at ways to mitigate any biodiversity impacts associated with this scheme, and to seek out opportunities for biodiversity net gain. Mitigation is not currently within the plan; Natural England would expect Affinity Water to add this to the rdWRMP19 in due course.
	Our Response	We will look at ways to mitigate any potential biodiversity impacts associated with the Brent Reservoir option and have included additional information relating to mitigation measures and opportunities for biodiversity net gain at marginal habitats in Appendix V. Where mitigation is subsequently proven to be required and agreed for the scheme this will be added to the option scope.
	Summary of any change to our final WRMP	The SEA Environmental Report Appendix V has been updated to include information on possible mitigation measures and seeking opportunities for biodiversity net gain.
1.8	Representation	In appendix V - While the interest features have been included in the assessment, it is not expressly stated that these features were identified through the 'favourable condition tables' which are available for all SSSIs. Affinity Water should clarify whether this was the evidence based used against which to assess potential impacts.
	Our Response	The interest features were identified using the NE SSSI database available online and the favourable condition tables and status were also referred to where necessary.
	Summary of any change to our final WRMP	N/A
1.9	Representation	Appendix V states the following under SEA objective 5 (d), in relation to the frequency and extent of drawdown: "There are ongoing discussions with Affinity Water and the Canals Trust for this scheme." Natural England should also be a part of these discussions, to ensure that the designated sites is not harmed.
	Our Response	We will continue to work closely with Natural England on the development of our options, including the GSK scheme which we believe Natural England are referring to.
	Summary of any change to our final WRMP	The SEA Environmental Report Appendix V and the SEA Environmental Report have been updated to reflect this comment.
1.10	Representation	Affinity Water should explore the potential to provide biodiversity enhancements at any impacted SSSI. Affinity Water may also want to look into how improving marginal habitats may enhance the resilience of the SSSI notified features to fluctuations in water levels.
	Our Response	Opportunities for net gain are identified in the assessment for the Brent Reservoir scheme in SEA Environmental Report Appendix V. Specific reference to bankside habitats has now been included.
	Summary of any change to our final WRMP	The SEA Environmental Report Appendix V has been updated to reflect this comment
1.11	Representation	Birds Green reservoir has the potential for Epping Forest SSSI to be impacted. This SSSI should be included within the assessment. Epping Forest SAC has been discussed and

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		screened out in the HRA, but there are areas of this SSSI which are not within the SAC boundary. Also, some SSSI interest features are no interest features of the SAC and so would not have been included in the HRA.
	Our Response	We have updated the SEA Environmental Report Appendix V to include consideration of this particular SSSI.
	Summary of any change to our final WRMP	The assessment in the SEA Environmental Report Appendix V has been updated to include consideration of Epping Forest SSSI.
1.12	Representation	Roding Valley Meadows SSSI is referred to in the SEA assessment as the Roding Meadows SSSI - the assessment should be updated with the correct name.
	Our Response	We will update Appendix V with the naming provided by Natural England.
	Summary of any change to our final WRMP	The assessment in Appendix V of the SEA Environmental Report has been updated to reflect this comment, along with similar references in the SEA Environmental Report
1.13	Representation	Where this assessment concludes that there may be an impact on AONBs in the longer-term Appendix VI of the SEA states that "...any new infrastructure should be designed and adhere to the aims and policies of ... AONB Management Plan(s)". Further to this, Natural England advise that Affinity Water works with relevant parties (including Natural England and the AONB Board) in the development of these options to ensure that the most appropriate landscape mitigation is selected, and that opportunities for landscape enhancements are identified where possible. Also, a cumulative impact assessment for each protected landscape should be undertaken on other companies plans or projects. This may be best undertaken through Water Resources South East.
	Our Response	We will endeavour to work closely with Natural England and the AONB board in the further development of these options to ensure that the most appropriate landscape mitigation is selected where required. Going forward we will take forward the Natural England suggestion regarding cumulative impact assessments for each protected landscape as an action for Water Resources in the South East to respond to.
	Summary of any change to our final WRMP	We have included text in the SEA Environmental Report to reflect these comments.
1.14	Representation	Realistically, there is no real way that the development of the south east Strategic Reservoir will not have a significant impact on the setting of the North Wessex Downs AONB, and this should be considered within the SEA and mitigation measures proposed. We advise that the options in the rdWRMP19 which relate to the south east strategic reservoir are included within the cumulative impacts assessment relating to other water company options.
	Our Response	The delivery of the South East Strategic Reservoir is taken into account within the existing cumulative effects assessment in Appendix VI. Appendix VI considers the potential for intra-plan cumulative effects, i.e. the potential for effects that could arise as a result of interactions between schemes proposed within each of the reasonable alternatives (which includes each adaptive future) for the Affinity Water WRMP19. The potential for cumulative effects with other plans and programmes, including other WRMPs, is addressed in Chapter 7 of the Environmental Report. We acknowledge that impacts have been identified to the North Wessex Downs AONB due to the SESR scheme in the SEA Environmental Report Appendix V (see Objective 6). Work carried out by WRSE on cumulative environmental assessment did not identify any cumulative effects on the North Wessex Downs AONB with any other water company WRMP scheme beyond those associated with the SESR scheme.

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	Summary of any change to our final WRMP	We have added some text to the SEA Environmental Report to address the comments relating to assessment of cumulative effects on the North Wessex Downs AONB.
1.15	Representation	Throughout the rdWRMP19 the 'Water Industry National Environment Programme' (WINEP) is referred to as the 'NEP'. The nomenclature for the 2019 price review is WINEP, and the rdWRMP19 should be updated to reflect this.
	Our Response	We have amended to WINEP in the fWRMP19.
	Summary of any change to our final WRMP	Where 'NEP' exists, we have changed this to WINEP.
1.16	Representation	The SEA very clearly explains the 'adaptive futures' approach. Natural England has no objection to the adaptive approach, so long as all of the options to be included in the adaptive futures approach pose no or low environmental risk, and that any potential environmental impacts can be mitigated. Sufficient evidence of environmental risks must be available before decisions are made about which options to pursue, and alternative supply options should be available in case further investigations conclude that the environmental risks are unacceptable.
	Our Response	<p>Our SEA provides information pertaining to environmental risks in accordance with the SEA requirements.</p> <p>Our WRMP AMP7 monitoring plan includes additional considerations relating to environmental risks for certain options.</p> <p>Further to that work, the company is undertaking a programme of work on our strategic regional options together with our working partners. This work in AMP7 will provide further opportunities to address environmental risks ahead of any decision point in the Spring of 2023 about taking forward large scale strategic options.</p> <p>Should we conclude there is an unacceptable level of risk associated with a particular option, our adaptive approach will allow us to develop an alternative solution.</p>
	Summary of any change to our final WRMP	N/A
1.17	Representation	<p>There does not appear to be a stance on net-gain included within the rdWRMP19. This is something that Natural England commented in our previous response, as we consider that the plan could achieve biodiversity net gain through habitat creation or catchment work as well as improvement to options mitigation.</p> <p>Environmental net gain is addressed within the SEA (para 6.3.7 and Appendix V), though this has not been transposed into the current iteration of the rdWRMP19. Natural England considers that the rdWRMP19 should be updated to include a commitment to embed biodiversity net gain into the plan, and that this opportunity is reflected both in the SEA matrices and the costing of the schemes.</p>
	Our Response	Our fWRMP19 has been amended to better reflect the stance on net gain as addressed within our SEA.
	Summary of any change to our final WRMP	The fWRMP19 includes information on net gain.
1.18	Representation	Natural England cannot find any mention of natural capital and ecosystem services in the broader rdWRMP. However, it is discussed within the SEA, section 5 (para 5.2.2) and Appendix II, and it is clear that an ecosystem services assessment has been undertaken. The information presented within the 'Ecosystem Services and the WRMP' section of Appendix II is very thorough, discussing the process of assessing ecosystem services alongside the policy context. The company attempted to score options based on whether

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		<p>the ecosystems services provided by each habitat type would benefit or be adversely affected by each option. Unfortunately Affinity Water found that insufficient data were available to undertake a meaningful assessment in this way, and felt that the assessment would not add any value to what was already being considered through the SEA and other assessments.</p> <p>Natural England is pleased that Affinity Water is thinking about how it can protect and enhance natural capital through its operations, and commends Affinity Water on its attempt to apply an ecosystems services assessment to its dWRMP. Even though it was ultimately unsuccessful, the company has identified information gaps and is already thinking about how to develop the process so that it can be improved and applied in WRMP24. Natural England will work with the company to help them achieve a more integrated assessment in WRMP24.</p>
	Our Response	<p>We welcome the opportunity to work with Natural England on Natural Capital and Ecosystem Services in advance of WRMP24 submission.</p> <p>Further, we encourage Natural England to work with WRSE on the potential for exploring this issue on a regional level.</p>
	Summary of any change to our final WRMP	N/A
1.19	Representation	There is an indication within Appendix V of the SEA that there may be an opportunity to restrict abstraction [for Brent Reservoir] in the reservoir during the summer. Natural England expects Affinity Water to restrict abstraction at sensitive times for the birds.
	Our Response	We have found that the release of water could be restricted during the breeding/ nesting seasons (broadly March to July) to protect designated bird species. We will work with Natural England to discuss the detailed operation of this scheme and agree the appropriate mitigation measures to protect SSSI bird species.
	Summary of any change to our final WRMP	The SEA Environmental Report Appendix V has been updated to reflect this comment
1.20	Representation	The comments that Natural England have made in relation to the HRA appropriate assessment for these options are also relevant to the SEA itself and in the Appendix V summary, for the overlapping SSSI features.
	Our Response	We have addressed the comments around the overlapping SSSI features relating to the HRA within the SEA Appendix V summary as well.
	Summary of any change to our final WRMP	The SEA Environmental Report Appendix V has been updated to reflect this comment, cross-referencing as necessary to the HRA Report.