



United Utilities

Water Resource Management Plan 2024

Strategic Environmental Assessment
Post Adoption Statement

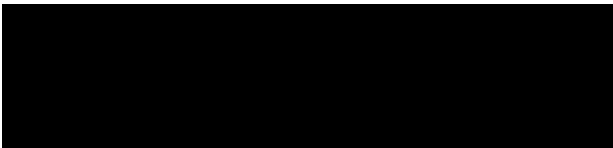


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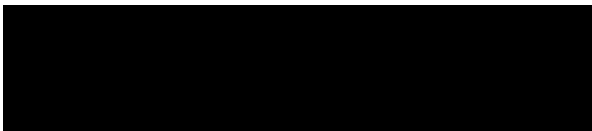
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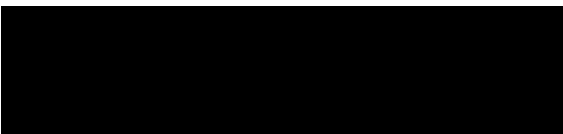
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Contents

1.	Introduction	5
1.1	United Utilities Water Resource Management Plan 2024	5
1.2	Preparation of the Water Resource Management Plan 2024	5
1.3	Strategic Environmental Assessment and the Water Resource Management Plan 2024	8
1.4	Purpose of this Post Adoption Statement	9
2.	How environmental considerations have been integrated into the WRMP	10
2.1	Environmental Considerations in the WRMP	10
	Supply-demand Forecasting	10
	Options Identification, Appraisal and Selection	12
	Consultation and Engagement	15
2.2	Environmental Considerations in the Strategic Environmental Assessment	15
3.	How the findings of the Environmental Report have been taken into account	20
3.1	Overview	20
3.2	Key Findings of the SEA	22
4.	How the opinions expressed in response to the consultation have been taken into account in preparing the Final Plan	24
4.1	Overview	24
4.2	SEA Consultation	24
	SEA Scoping Consultation	24
	Public Consultation on the Environmental Report	25
4.3	Consultation on the Draft WRMP	25
5.	The reasons for choosing the WRMP as adopted, in light of the other reasonable alternatives dealt with	28
5.1	Reasons for the Selection of the Final WRMP	28
6.	The measures decided concerning monitoring	30
6.1	Monitoring the Effects of the WRMP	30
<hr/>		
	Table 2.1 Key Environmental, Social and Economic Issues	15
	Table 2.2 Assessment Framework for the Revised Draft WRMP24	18
	Table 3.1 Key Stages in the Development of the Environmental Report and its Relationship with the WRMP24	20
	Table 3.2 Key Findings of the Environmental Report	22
	Table 4.1 Summary of Consultation Responses Received on the Draft WRMP24	26
	Table 6.1 Measures for Monitoring Effects	30

Appendix A SEA Compliance

Appendix B Schedule of Consultation Response

1. Introduction

This report forms the Post Adoption Statement (PAS) to accompany the final version of United Utilities' Water Resources Management Plan 2024 (WRMP24). The report describes the way in which United Utilities has taken environmental considerations and the views of consultees into account in the adopted WRMP24 and fulfils the plan and programme adoption requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633).

1.1 United Utilities Water Resource Management Plan 2024

- 1.1.1 United Utilities Water (U UW) supplies water to some 3 million households and 200,000 business customers in Cumbria, Lancashire, Greater Manchester, Merseyside, most of Cheshire and a small part of Derbyshire. More than 90% of the water supplied by U UW comes from rivers and reservoirs, with the remainder from groundwater.
- 1.1.2 Water companies in England and Wales have a statutory requirement to prepare a Water Resources Management Plan (WRMP) every five years¹. Each water company's WRMP sets out how the balance between water supply and demand, and security of supply, will be maintained over a minimum of 25 years in a way that is economically, socially and environmentally sustainable².
- 1.1.3 U UW has finalised its Water Resources Management Plan 2024 (WRMP24). It sets out a long-term, best value and sustainable plan for water supplies in the North West. The WRMP24 plans for an adequate supply to meet demand from 2025 to 2050 and beyond, and a supply system that is resilient to drought. WRMPs are reviewed on a rolling five-year basis, with U UW's previous plan being published in 2019.
- 1.1.4 U UW's WRMP24 has been developed within a regional water resources planning framework covering all or part of the operational areas of Dŵr Cymru Welsh Water (DCWW), Hafren Dyfrdwy (HD), Severn Trent Water (STW), South Staffordshire Water (SSW) and U UW that is managed by Water Resources West (WRW). WRW is currently preparing a Regional Plan for the period 2025 to 2085 that will address long-term regional and inter-regional, multi-sectoral water resources management pressures and will draw on water resource options from the member water companies' WRMP24s, as well as the Strategic Resource Options (SROs) being taken forward by the companies.

1.2 Preparation of the Water Resource Management Plan 2024

- 1.2.1 Consistent with the Water Resource Planning Guidelines (WRPG), the development of the WRMP has included the completion of three key stages:
- the publication of a Draft WRMP24 for public consultation following submission to Defra in December 2022;
 - the publication of a Revised Draft WRMP24 and the publication of a Statement of Response describing the consultation on the Draft WRMP24 and how the company

¹ The duty to prepare and maintain a WRMP is set out in sections 37A to 37D of the Water Industry Act 1991

² EA, Ofwat and NRW (2023) Water Resource Planning Guideline (WRPG) [online]. Available at: <https://www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-planning-guideline>.

took into account the comments received in the preparation of the Revised Draft WRMP24; and

- the publication of a Final WRMP24.

1.2.2 The Draft WRMP24 was published on the 7th December 2022 with consultation concluding on the 15th March 2023. Formal written responses on the Draft WRMP24 were received from a total of 26 consultees, as well as informal feedback from the consultation events and other interactions. U UW subsequently published the Revised Draft WRMP24 along with the Statement of Response to the consultation in June 2023.

Following a review of the Statement of Response to the consultation and the changes made in the Revised Draft WRMP24, Defra requested more information on the plan. U UW responded to this request in 2024. Subsequently, the Secretary of State for Environment, Food and Rural Affairs issued a 'Direction to Publish' letter to U UW. Following the receipt of direction to publish, U UW has published the final WRMP. The WRMP24 is available on U UW's website: <https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/>

1.2.3 In preparing its WRMP24, U UW has sought to meet the following key objectives:

- Maintain a resilient, safe and clean supply of water for its customers;
- Ensure that its future water resources strategy is in line with government aspirations, particularly in relation to targets/ambitions for reducing leakage and customer water use;
- Develop a plan which represents best value for customers, both in the near future and in the longer term;
- Ensure that its plan is flexible and can adapt to possible alternative future scenarios;
- Develop a plan to support national drought resilience through water transfer and which is in line with its water transfer principles;
- Ensure that its plan aligns with the relevant regional plan;
- Ensure that it adopts the latest methods and comply with regulatory guidelines in preparing its plan;
- Ensure that its plan enables it to meet its long-term environmental destination;
- Ensure that its plan takes into account customer and stakeholder preferences where it is feasible to do so; and
- Ensure that its plan delivers environmental benefits, taking into account sustainability and natural capital effects.

1.2.4 U UW supply area includes three public water supply Water Resource Zone³ :

- Carlisle WRZ;
- North Eden WRZ;
- Strategic WRZ.

1.2.5 As part of the WRMP24 development process, U UW initially identified feasible supply-side and demand-side options to resolve deficits, improve network resilience and make water available for transfer. These options were subject to a staged filtering process (which

³ Section 4.4. of the WRPG defines a water resource zone as "an area within which the sources of water and distribution of water to meet demand, is largely self-contained (apart from any agreed bulk transfers)".

included a high-level consideration of the HRA-related risks associated with each option) designed to establish the best-value plan for U UW taking into account the regional plan requirements.

- 1.2.6 The Final WRMP24 seeks to deliver the following three strategic choices:
- Achieve Government targets to halve leakage and reduce customer consumption to 110 litres per person per day by 2050.
 - Support national planning by developing large-scale water transfers that are adaptable and flexible to the changing needs of other regions.
 - In line with customer preferences, improve the level of service for temporary use bans (TUBs), halving the expected frequency of occurrence to 1 in 40 years (5% annual chance). Concurrently, U UW will improve the frequency of implementing drought orders and drought permits to 1 in 50 years (2% annual chance).
- 1.2.7 U UW's demand forecast shows a very small increase of around 0.7% across the 25-year planning horizon, excluding the impacts of demand management programmes, and so the leakage reduction and water efficiency measures and TUBs measures will increase resilience in the supply.
- 1.2.8 Following consultation on the Draft WRMP24, U UW reviewed its best value plan for WRMP24 and as a result, the preferred plan contained in the Draft WRMP24 was modified. In particular, the number of supply options which now make up the preferred plan for the Final WRMP24 has significantly reduced owing to, in particular, decreased water transfer needs (following the final regional planning reconciliation round).
- 1.2.9 The Draft WRMP24 included a total of 168 MI/d of exports to STW and Water Resources South East (WRSE) from U UW's SRZ, starting with a 75 MI/d transfer in 2031. Seven supply options were included in preferred plan to support these transfers. Transfers to WRSE are no longer selected in the preferred plan, linked to WRSE companies lowering their demand projections following consultation feedback. STW's need in 2031 also reduced to 25 MI/d. As a consequence of these changes there were fewer supply options in the Revised Draft WRMP24 preferred plan with only three groundwater supply options included.
- 1.2.10 When combined with updates to the demand management measures at Revised Draft WRMP24 stage, it also means that improving U UW's level of service for temporary use bans (TUBs) was no longer reliant on the dual-purposing of water transfer support options. Further to comments received from regulators on the Draft WRMP24, the preferred plan also included drought permit options taken from U UW's Drought Plan.
- 1.2.11 The Revised Draft WRMP24 was submitted to the Secretary of State for the Department for Environment, Food and Rural Affairs (Defra) for review and approval in June 2023. The Secretary of State subsequently requested further information on the Revised Draft WRMP (December 2023)⁴, which was provided by U UW alongside updated environmental reports (February 2024). U UW continued to work with the regulators through 2024 to resolve outstanding issues. Modelling of the supply options in the Revised Draft demonstrated issues with Water Framework Directive (WFD) compliance. U UW received direction to publish its final WRMP24 from Defra in a letter dated 6 September 2024⁵. This indicated that the preferred supply side options should be removed from the Final WRMP24. The Final WRMP24 therefore replaces those options with one surface water supply option. This option will be implemented two years later in 2033.

⁴ Letter from Defra Deputy Director, Water Sector Delivery, Defra to UU (no reference) dated December 2023.

⁵ Letter from Defra Deputy Director, Floods and Water, Defra to UU (no reference) dated 06 September 2024.

1.2.12 The Final WRMP24 therefore includes:

- One supply option to provide 25MI/d of additional water supply capacity.
- 33 customer, distribution and production options to provide some 282MI/d.

1.2.13 The supply option has uncertainty remaining regarding compliance with WFD. However, it is considered feasible that the option may be concluded to be compliant following further investigation and assessment. Recognising the uncertainty, and consistent with the WRPG requirements and taking into account feedback from several environmental stakeholders including the Environment Agency (EA), Natural England (NE), Natural Resources Wales (NRW) and Mersey Rivers Trust, U UW identified alternative options that could provide sufficient capacity to completely replace the selected supply option in the event that they are required.

1.3 Strategic Environmental Assessment and the Water Resource Management Plan 2024

1.3.1 SEA is a statutory requirement⁶ for plans and programmes that could have significant environmental effects. The SEA process identifies, describes and evaluates potential effects; proposing where appropriate, mitigation and/or enhancement measures.

1.3.2 SEA is a systematic decision support process, aiming to ensure that the likely significant environmental effects of plans and programmes are identified, described to avoid, manage or mitigate any significant adverse effects and to enhance any beneficial effects. In this context, the purpose of SEA is to encourage relevant plan authors to integrate environmental considerations into the development of any plan or programme. Generally, a SEA is therefore conducted before an Environmental Impact Assessment (EIA) is undertaken.

1.3.3 In this context, the purpose of the SEA of the WRMP24 has been to:

- identify the potentially significant environmental effects of the WRMP24 in terms of the measures being considered by U UW for water resource management;
- help identify appropriate measures to avoid, reduce or manage adverse effects and to enhance beneficial effects associated with the implementation of the WRMP24 wherever possible;
- give the statutory SEA bodies, stakeholders and the wider public the ability to see and comment upon the effects that the Draft WRMP24 may have on them, their communities and their interests, and encourage them to make responses and suggest improvements for inclusion in the Revised Draft WRMP24; and
- inform U UW's selection of measures to be taken forward into the final WRMP24.

1.3.4 SEA comprises five key stages:

- Stage A: Scoping;
- Stage B: Develop and Refine Alternatives and Assess Effects;
- Stage C: Prepare Environmental Report;
- Stage D: Consult on the Draft Plan and Environmental Report and Prepare the Post Adoption (SEA) Statement; and

⁶ Statutory Instrument 2004 No. 1633 – The Environmental Assessment of Plans and Programmes Regulations 2004

- Stage E: Monitor Environmental Effects.

- 1.3.5 Consultation on the scope of the SEA (Stage A) was undertaken as part of the integrated working with Water Resource West (WRW) when the WRW Regional Plan and WRMP24 SEA Scoping Report was issued for scoping consultation for 5 weeks from the 8th April and the 13th May 2021. Consultation responses were used to refine the proposed scope and approach to the SEA.
- 1.3.6 The Draft WRMP24 was then subject to SEA (Stage B). This assessed the likely significant effects on the environment of the Draft WRMP24 including an assessment of all the feasible options and the preferred options. The findings of the assessments were presented in an Environmental Report (Stage C) that was published for consultation alongside the Draft WRMP24 from 7th December 2022 to 15th March 2023 (Stage D). Following consultation, U UW prepared a Statement of Response to the representations received. It has also completed further work reflecting regional reconciliation which led to amendments to the Draft WRMP24. A Revised Draft WRMP24 was completed and given the changes was also subject to further environmental assessment. Following the replacement of the three supply options with one supply option in the Final WRMP24, the changes have been subject to environmental assessment.
- 1.3.7 This PAS has been published on U UW's website at:
<https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/>

1.4 Purpose of this Post Adoption Statement

- 1.4.1 Regulation 16 (4) of the SEA Regulations require that when a plan or programme is adopted (in this case, the WRMP), the consultation bodies, the public and any other Member States consulted on the Environmental Report are informed and the following specific information is made available:
- the plan as adopted;
 - a statement summarising:
 - ▶ how environmental considerations have been integrated into the WRMP;
 - ▶ how the Environmental Report has been taken into account;
 - ▶ how opinions expressed in response to the consultation on the Draft WRMP and the Environmental Report have been taken into account;
 - ▶ the reasons for choosing the WRMP, as adopted, in the light of the other reasonable alternatives dealt with; and
 - ▶ the measures that are to be taken to monitor the significant environmental effects of the implementation of the WRMP.
- 1.4.2 The purpose of this Post Adoption Statement is to provide the specific information outlined under each of the points listed above and which is presented in the following sections of this statement.

2. How environmental considerations have been integrated into the WRMP

2.1 Environmental Considerations in the WRMP

2.1.1 The subsections that follow set out how environmental considerations have been taken into account by UUW during the following key stages of the development of WRMP24:

- supply-demand forecasting;
- options identification, appraisal and selection; and
- consultation and engagement.

Supply-demand Forecasting

2.1.2 All water companies in England and Wales are required to set out a baseline forecast of demand for water for a minimum of 25 years, assuming current demand policies. This must be compared against a baseline forecast of available water supply, including current resources and future planned supply schemes to determine whether there is likely to be a deficit in any WRZ over the planning horizon of the WRMP.

2.1.3 UUW has considered the following factors in calculating the baseline forecast of available water supply for the WRMP; these include environment considerations (highlighted), and which are then detailed below:

- Deployable output – the maximum quantity of water that can be provided from a resource zone during a range of different weather conditions, including droughts of a defined severity, while meeting stated levels of service;
- **Climate change impacts** – future changes to deployable output due to the impacts of climate change;
- **Sustainability changes** – changes to abstraction licences, which are necessary to protect the environment, often resulting in a reduction to deployable output;
- Raw water and process losses – an allowance for small volumes of water, which are lost or used between the raw water intake and the water treatment works (raw water losses) and between the water treatment works inlet and the outlet into the distribution system (process losses); and
- Outage – an allowance for temporary reductions in deployable output, which are necessary from time to time, due to proactive maintenance and other issues including pollution, power failure and mechanical breakdown.

Climate Change Impacts

2.1.4 The potential future impact of climate change on UUW's supply forecast was assessed using data from the latest UKCP18 climate projections, along with a range of tools such as water resources models. Projections from a wide range of UKCP18 outputs were used:

- 12 Regional Climate Models; and

- 3,100 probabilistic projections (3,000 for the North-West River Basin and 100 for England and Wales).

2.1.5 The UKCP18 climate change projections for alternative future emissions scenarios, referred to as Representative Concentration Pathways (RCPs) were used to develop and test U UW's adaptive plan.

Sustainability Changes Under the Water Industry National Environment Programme

2.1.6 The environmental sensitivity of the area in which U UW operates has been a key consideration in the development of the WRMP24. The region includes a number of sites that are designated at an international, national or local level as important for biodiversity, including:

- 18 Ramsar Sites;
- 14 Special Protection Areas (SPA);
- 42 Special Areas of Conservation (SAC);
- 451 Sites of Special Scientific Interest (SSSI);
- 4 Marine Conservation Zones (MCZ);
- 32 National Nature Reserves (NNR);
- 154 Local Nature Reserves (LNR).

2.1.7 U UW are required to meet increasingly stringent environmental consent levels - which in turn are underpinned by several key legislative requirements including the Water Framework Directive Regulations⁷ and Habitats Regulations⁸. If existing abstractions are deemed to be causing environmental harm, U UW will work with regulators to implement solutions which mitigate impacts from abstraction and enhance the environment. These solutions include sustainability changes which may lead to changes to abstraction licences for environmental reasons, which may have an impact on our supply forecasts (typically a reduction in our assessed deployable output for the relevant resource zone). These are determined through ongoing investigations in collaboration with the Environment Agency under Water Industry National Environment Programme (WINEP).

Sustainability Changes Under Environmental Destination

2.1.8 The EA has set out its aspirations for long-term environmental improvements to be incorporated into each regional and company resources plan in the National Framework for Water Resources⁹. To support this, the EA has identified waterbodies, which are at risk of not meeting their environmental flow objectives by 2050, taking into account the future impacts of climate change.

2.1.9 U UW's target is to achieve the long-term environmental destination by 2050 in line with the National Framework. This will require short, medium and long-term actions including abstraction licence changes and environmental improvements to catchments.

2.1.10 There are a number of possible scenarios relating to the degree of environmental protection provided and the assumptions relating to abstraction rates. U UW assessed a number of these possible scenarios to determine the impact of these environmental

⁷ Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

⁸ HM Government (2017) The Conservation of Habitats and Species Regulations 2017 (as amended)

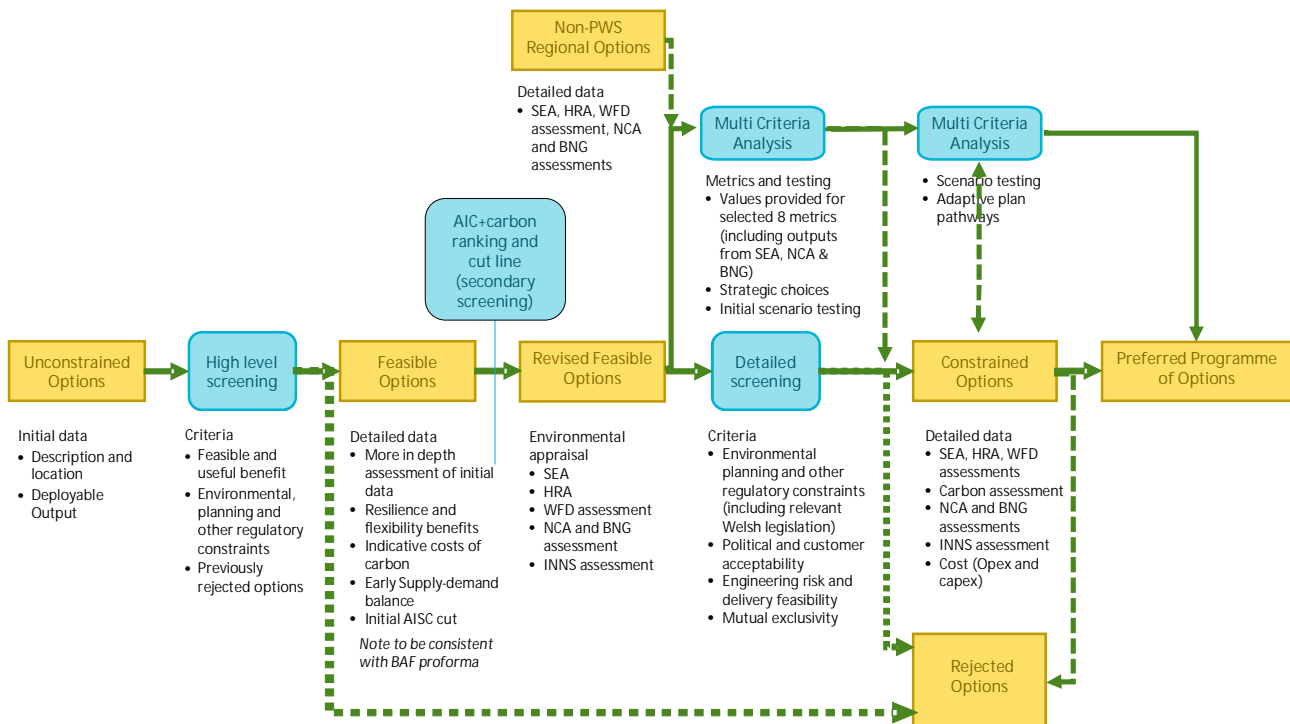
⁹ EA (2020) *Meeting our future water needs: a national framework for water resources*. Available online: <https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources>

ambitions on supply availability in developing the WRMP24 and have also profiled licence reductions over the period from 2035–2050. This will be refined for WRMP29 to reflect further work with the EA to resolve current uncertainties.

Options Identification, Appraisal and Selection

- 2.1.11 UUW has identified a supply demand deficit over the lifetime of the plan. The identification, appraisal and selection of options to address the supply demand deficit has been informed by detailed consideration of their potential environmental effects.
- 2.1.12 The plan process initially reviews as many potential solutions as possible (the ‘unconstrained list’ of options) to identify ‘feasible’ options for each WRZ which will contribute to meeting the supply demand deficit in one or more zones. Types of options considered to provide additional water resources to meet any forecast deficit in a WRZ can include:
- demand management options, which include measures to manage the demand for water such as smart meters, rainwater harvesting, greywater recycling or household visits to install water efficiency measures;
 - distribution and leakage options, which include measures to optimise the efficiency of water networks, reduce leakage and minimise any unscheduled resource losses;
 - production efficiency options, which include measures to increase the efficiency and effectiveness of treatment processes;
 - supply options, which include measures to increase supply such as greater peak output at existing groundwater sources, reservoir or surface water supply and which will include SROs; this also includes catchment management options, for example nature-based solutions; and
 - non-PWS options, which include any options which increase water resource availability or reduce the need for abstraction outside of that needed for public water supplies.
- 2.1.13 Options tend to be generated from the company responsible for the WRMP but can also be joint (where more than one company is working in partnership), provided by third parties or be multi-sector.
- 2.1.14 All zones with deficits are subject to a “decision making” process using a Multi-Criteria Analysis (MCA) and option screening to identify a preferred plan (comprising of selected options) to address the supply demand deficit. The MCA is used consistently to supplement the traditional Economics of Balancing Supply and Demand (EBSA) approach and further zonal specific decision methods can also be used appropriate to the complexity of the zone. The decision-making method factors in multiple costs and benefits and considers the interaction between zones to establish a best value plan for the company (and for the region as whole).
- 2.1.15 Scenarios are used to test the preferred and any identified alternative plans. They explore what would happen if one of these plans was adopted and the future was different to that assumed in the “central” planning assumptions. The scenarios could be used to make the preferred plan an adaptive plan (in which different options could be taken forward after key decision points, if circumstances changed).
- 2.1.16 The process, and key decision points as they have been applied to the development of the WRW Regional Plan and constituent WRMPs, are illustrated in **Figure 2.1**.

Figure 2.1 Environmental Assessments into Option and Plan Development



2.1.17 Environmental assessment information (derived from the SEA and other regulatory assessments) has been provided for the following key decision points:

- MCA, undertaken in advance of the selection of options. UUW, as part of WRW developed a best value optimisation tool, ValueStream1, to provide equivalent monetised costs for best value metric scores, enabling option comparison.
- detailed screening of the revised feasible options, using screening criteria developed by UUW in conjunction with WRW, the other core member companies and with regulator feedback;
- scenario testing of the constrained options; and
- selection of the preferred programme of options.

Biodiversity Net Gain

2.1.18 Biodiversity Net Gain (BNG) is an approach to the development of land and marine management that aims to leave biodiversity in a measurably better condition than prior to development. The WRPG¹⁰ states that water companies are required to ensure their WRMP delivers net biodiversity gain where appropriate and use a proportionate natural capital approach. Additionally, the EA and NRW have published separate supplementary guidance on Environment and Society in decision-making^{11,12}, which provides more detail about the expectation for ecosystem resilience in England and Wales respectively, and

¹⁰ EA, Ofwat and NRW (2023) Water Resource Planning Guideline (WRPG) [online]. Available at: <https://www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-planning-guideline>.

¹¹ EA (2021) WRPG 2024 supplementary guidance – Environment and society in decision-making. Published 24/03/2021

¹² NRW (2021) WRPG 2024 supplementary guidance – Environment and Society in decision-making (Wales). Published 07/04/2021

how a Natural Capital Assessment (NCA) and ecosystem resilience can support decision-making.

- 2.1.19 A separate BNG and NCA was undertaken of the WRMP24 to address these requirements. Both the BNG and NCA have been updated to reflect UUW's Final WRMP24 preferred plan and, where appropriate, the findings have been used to inform the SEA, notably against the biodiversity, flora and fauna topic and specifically an assessment objective concerning sustainable natural resources. The findings of the NCA were integrated into UUW's option appraisal process through the use of the MCA.

Water Framework Directive (WFD) Assessment

- 2.1.20 The Water Framework Directive¹³ (WFD) has been enacted into UK legislation as the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 in England and Wales.
- 2.1.21 The WFD sets a default objective for all rivers, lakes, estuaries, groundwater and coastal water bodies to achieve 'good' status or potential by 2027 at the latest. The current (baseline) status (e.g., 2015 classification), and the measures required to achieve the 2027 status objective, are set out for each water body in the relevant River Basin Management Plans (RBMPs), prepared by the EA and NRW every six years. The current, updated RBMPs were published in October 2022.
- 2.1.22 UUW (for the WRMP24) must be able to demonstrate that the plan will not cause a deterioration in respect of these baseline conditions. Furthermore, for those water bodies that are not currently attaining good status, UUW must be able to confirm that WRMP24 would not preclude the delivery of measures to facilitate the improvements needed to attain good status.
- 2.1.23 A separate WFD Assessment has been undertaken for the WRMP24 to provide the evidence base to respond to these requirements. This has included an assessment of the revised feasible options, revised feasible option variants developed as part of the post Revised Draft WRMP24 work, and reflecting the ongoing development of Strategic Resource Options (SRO), and the preferred options. All construction and operational aspects of options in the WRMP have been considered in the WFD Assessment in order to determine whether there would be any effects, and if so, whether these would lead to a deterioration of the WFD status of waterbodies.
- 2.1.24 The WFD Assessment findings have also been used to inform the SEA, notably against the water quality topic.

Habitat Regulations Assessment

- 2.1.25 A Habitats Regulations Assessment¹⁴ (HRA) of the WRMP24 has also been completed. An HRA determines whether there will be any 'likely significant effects' on any National Site Network¹⁵ (NSN) site as a result of a plan's implementation (either on its own or 'in combination' with other plans or projects) and, if so, whether there will be any 'adverse effects on site integrity'.

¹³ European Union (2000) Directive 2000/60/EC of the European Parliament and of the Council. Following the UK's exit from the European Union on 31.12.20, the Directive no longer applies to the UK.

¹⁴ An assessment against the requirements of Regulation 63 (and, if applicable, Regulation 64) of The Conservation of Habitats and Species Regulations (2017)

¹⁵ Defra (2021) Changes to the Habitats Regulations 2017. Available online: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

2.1.26 A HRA was undertaken for the WRMP24 to ensure that the preferred plan has been assessed in accordance with Regulation 63 of the Habitats Regulations. Whilst the HRA has been undertaken and reported separately, its findings have been used as appropriate to inform the findings of this SEA, notably against the biodiversity, fauna and flora topic.

Consultation and Engagement

2.1.27 U UW has undertaken extensive stakeholder and customer engagement during the preparation of the WRMP. This has included ongoing engagement with the statutory SEA consultation bodies and in particular, U UW has liaised closely with the Environment Agency (EA) and NE to ensure that the WRMP24 complies with the requirements of the statutory environmental assessments.

2.2 Environmental Considerations in the Strategic Environmental Assessment

2.2.1 To provide the context for the SEA, and in compliance with the SEA Regulations, the relevant aspects of the current state of the environment and its evolution without the WRMP were considered at the outset of the SEA process, along with the environmental characteristics likely to be significantly affected by the plan. This information was contained in the SEA Scoping Report and subsequently updated as part of the Environmental Report.

2.2.2 The key environmental, social and economic issues identified in U UW’s operational area and subsequently reflected in the assessment of WRMP24 options are summarised in **Table 2.1**.

Table 2.1 Key Environmental, Social and Economic Issues

Topic Area	Key Environmental, Social and Economic Issues Relevant to the WRMP24
Biodiversity, Flora and Fauna	<ul style="list-style-type: none"> • Key pressures and risks in respect of biodiversity and nature conservation that are relevant include, inter-alia: <ul style="list-style-type: none"> ○ population growth; ○ habitat loss and fragmentation by development; ○ agricultural intensification and changes in agricultural management practices; ○ water abstraction, drainage or inappropriate river management; ○ lack of appropriate habitat management; ○ atmospheric pollution (acid precipitation, nitrogen deposition); ○ water pollution from both point and wider (diffuse) agricultural sources; ○ climate change and sea level rise; ○ recreational pressure and human disturbance; and ○ invasive and non-native species. • The need to protect, maintain or enhance biodiversity, ecological functions and biodiversity connectivity within United Utilities’ supply and source areas, particularly protected sites designated for nature conservation. • The need to promote the resilience of ecosystems. • The need to continue to increase and improve the condition of priority habitats and habitats of priority species and restore populations of these species and other specially protected species. • The need to avoid, and mitigate against where necessary, activities likely to cause irreversible damage to natural heritage. • The need to take opportunities to improve connectivity between fragmented habitats to create functioning habitat corridors. • The need to control the spread of Invasive Non-Native Species (INNS) and eradicate where already present.

Topic Area	Key Environmental, Social and Economic Issues Relevant to the WRMP24
	<ul style="list-style-type: none"> • The need to recognise the importance of allowing wildlife to adapt to climate change. • The need to engage more people in biodiversity issues so that they personally value biodiversity and know what they can do to help, including through recognising the value of the ecosystem services.
Soils, Land Use and Geology	<ul style="list-style-type: none"> • The need to protect and avoid damage to geodiversity and conserve and enhance sites designated for geological interest (including geological SSSIs). • The need to manage impacts on soil resources, including control of pollution and remediation of contaminated land, and minimise the loss of the best and most versatile agricultural land. • The need to conserve and enhance soil quality and function (including peatlands and carbon sequestration); • The need to sustainably manage and/or improve the quality of agricultural land in the region; • The need to influence how land is managed, promoting sustainable patterns of land use including the use of previously developed land and minimising the requirements for best and most versatile land. • The need to manage the land more holistically at the catchment level, benefitting landowners, other stakeholders, the environment and sustainability of natural resources (including water resources).
Water	<ul style="list-style-type: none"> • The need to further improve the quality of the region's river, estuarine and coastal waters taking into account WFD/RBMP objectives. • The need to maintain and improve the quantity and quality of groundwater resources taking into account WFD/RBMP objectives • The need to improve the resilience, flexibility and sustainability of water resources in the UJW region, particularly in light of potential climate change impacts on surface water and groundwater. • The need to address increased pressures on the public water supply. • The need to ensure sustainable abstraction to protect the water environment and meet society's needs for a resilient water supply. • The need to ensure that people understand the value of water. • The need to reduce flood risk. • The need to ensure the continued risk of flooding is managed and mitigated effectively.
Air Quality	<ul style="list-style-type: none"> • The need to minimise emissions of pollutant gases and particulates and enhance air quality arising from the implementation of UJW's WRMP. • The need to reduce the need to travel and promote sustainable modes of transport.
Climatic Factors	<ul style="list-style-type: none"> • The need to reduce greenhouse gas emissions arising from implementation of UJW's WRMP. • The need to take into account, and where possible adapt to, the potential effects of climate change through, sustainable water resource management, water use efficiencies, specific aspects of natural ecosystems (e.g. connectivity), as well as accommodating potential opportunities afforded by climate change. • The need to increase environmental resilience to the effects of climate change.
Population and Human Health	<ul style="list-style-type: none"> • The need to ensure that the WRMP has a positive economic impact. • The need to ensure that the water requirements of people, visitors and other users such as energy and agriculture can be met at all times, in a sustainable way, including in the seasonal peaks associated with tourism. • The need to ensure that water supplies remain affordable, in particular for deprived or vulnerable communities. • The need to accommodate an increase in population, households, dwellings and development associated with other uses that might impact on demand for water whilst ensuring the continued provision of essential services including water supply.

Topic Area	Key Environmental, Social and Economic Issues Relevant to the WRMP24
	<ul style="list-style-type: none"> • Health inequalities exist in many communities. This is due to a number of factors (and the interplay between them) including housing quality, economic wellbeing, employment, lifestyle, heredity factors, cultural and environmental factors. • Sustained exposure to elevated air pollution levels (including exposure to elevated concentrations of particulate matter, oxides of nitrogen and sulphur) contributes to respiratory illness. • The need to ensure continuing safe, reliable and resilient provision of water services to maintain health and wellbeing of the population. • The need to ensure that UUW's WRMP measures do not adversely affect the health and wellbeing of any member of the community. • The need to ensure that UUW's WRMP minimise impacts on the ability of people to access facilities for sport, recreation and leisure purposes. • The need to ensure that sites of nature conservation importance, heritage assets, water resources, important landscapes and public rights of way contribute to recreation and tourism opportunities and subsequently health and wellbeing and the economy.
Material Assets and Resource Use	<ul style="list-style-type: none"> • The need to minimise current and future demand for water resources through water efficiency measures (including metering). • The need to continue to actively control leakage to optimise the water available. • The need to reduce energy consumption. • The need to ensure the sustainable and efficient use of resources such as construction materials. • The need to minimise waste arisings, promote reuse, recovery and recycling and minimise the impact of wastes on the environment and communities.
Cultural Heritage	<ul style="list-style-type: none"> • The need to conserve and enhance the historic significance of buildings, monuments, features, sites, places, areas of archaeological and cultural heritage interest, and their settings. • The need to conserve and enhance the World Heritage Sites within the WRMP area. • The need to promote access to heritage sites within UUW's ownership where possible and safe to do so; and • The need to avoid damage to important wetland areas with potential for paleoenvironmental deposits.
Landscape	<ul style="list-style-type: none"> • The need to ensure the special qualities of designated landscapes including National Park and AONBs are protected. • The need to minimise any adverse impacts upon landscape and seascape that may result from UUW's WRMP24, having regard to NCA profiles and the potential for effects on designated landscapes and their settings. • The need to conserve and enhance landscape and seascape character and distinctiveness, taking into account the effects of climate change and recommendations for managing change in the profile of relevant NCAs.

2.2.3 A draft assessment framework was developed to assess the economic, social and environmental effects of the WRMP24, and revised to reflect scoping consultation comments. This framework sets out a number of assessment objectives relating to the key issues identified in **Table 2.1**. For each objective, guide questions are also provided. The assessment framework that has been used to assess all iterations of the WRMP24 and is shown in **Table 2.2**.

Table 2.2 Assessment Framework for the Revised Draft WRMP24

Topic	Assessment Objective
Biodiversity, Flora and Fauna	1. To protect, restore and enhance biodiversity, including designated sites of nature conservation interest and protected habitats and species, enhance ecosystem resilience and habitat connectivity and deliver a net biodiversity gain.
	2. To protect and enhance sustainable natural resources and the ecosystem services they provide.
	3. To avoid and, minimise the risk of spread of, and, where required, manage invasive and non-native species (INNS).
Soils, Land Use and Geology	4. To protect and enhance soil quantity, quality and functionality and geodiversity and ensure the appropriate and efficient use of land.
Water – Quantity	5. To protect and enhance surface and ground water levels and flows.
Water –Quality	6. To protect and enhance the quality of surface and groundwater resources.
Water – Flood Risk	7. To reduce or manage flood risk.
Air	8. To minimise emissions of pollutant gases and particulates and enhance air quality.
Climatic Factors	9. To reduce greenhouse gas emissions.
	10. To adapt and improve resilience to the threats of climate change.
Population	11. To promote a sustainable economy and maintain and enhance the economic and social well-being of local communities.
	12. To maintain and enhance tourism and recreation.
Human Health	13. To protect and enhance human health and well-being.
Material Assets - Water Resources	14. To promote and enhance the sustainable and efficient use of resilient water resources.
Material Assets – Waste and Resource Use	15. To minimise waste, promote resource efficiency and move towards a circular economy.
Cultural Heritage	16. To conserve and enhance the historic environment including the significance of heritage assets and their settings and archaeological important sites.
Landscape	17. To conserve, protect and enhance landscape and townscape character and visual amenity.

2.2.4 The effects of the WRMP24 have been assessed in a staged process, complementary to the development of the plan, and reflecting the decision-making requirements, as follows:

- Revised feasible option assessment: a high-level assessment of all revised feasible options (including supply and demand management options) and revised feasible option variants against the 17 SEA assessment objectives detailed in **Table 2.2** with findings used to inform the plan decision making.
- Preferred option assessment: for those options selected, a more detailed assessment has been undertaken of the preferred plan options against the 17 SEA assessment objectives detailed in **Table 2.2**.
- Preferred programme assessment: the cumulative effects of the preferred programme of options have been completed, to ensure that the effects of the WRP24 have been

identified, described and evaluated. This has included consideration of the cumulative effects of any other relevant plans, programmes or major projects.

- Reasonable alternative plan assessments: the cumulative effects of any reasonable alternative plans have been identified, described and evaluated for consideration along with the preferred plan.

2.2.5 The WRMP24 options have been assessed based on the nature of the effect, its timing and geographic scale, the sensitivity of the human or environmental receptor that could be affected, and how long any effect might last. Assessment matrices have been used to capture the assessment of each measure in a consistent manner.

2.2.6 Specific guidance was developed and consulted on for what constitutes a significant effect, a moderate effect, a minor effect or a neutral effect for each of the SEA objectives. These 'definitions of significance' have helped to ensure a consistent approach to interpreting the significance of effects and support understanding of the findings of the assessment.

3. How the findings of the Environmental Report have been taken into account

3.1 Overview

3.1.1 The SEA Environmental Report and WRMP24 have been developed in tandem. **Table 3.1** details key stages of the SEA and its relationship with the development of the WRMP24.

Table 3.1 Key Stages in the Development of the Environmental Report and its Relationship with the WRMP24

Strategic Environmental Assessment	WRMP24	Relationship
Scoping		
<p>The scoping stage of the SEA identified relevant policies, plans, programmes, strategies and key sustainability issues. Then collated and analysed baseline information, which could be affected by, or which could affect, the WRMP.</p> <p>The scoping stage also developed the assessment framework and involved consultation on the scope of the SEA.</p>	<p>The WRMP24 used the plans and programmes identified to ensure that it was in compliance with local, national and international policy and legislation.</p> <p>Baseline information supported early optioneering.</p>	<p>The links between the other relevant plans, programmes, policies and strategies that were applicable to the WRMP24 and its Environmental Report were outlined. These included plans and programmes at an international, national, and regional level, covering a variety of topics.</p> <p>Information on environmental issues helped determine constraints on the suitability of certain options.</p> <p>The SEA objectives ensured that the full range of social, economic and environmental issues was considered in the WRMP24's development.</p>
Assessment		
<p>Testing the plan or programme objectives against the SEA objectives</p>	<p>The Environment Report and the WRMP24 were developed together, with the draft and revised draft versions of the WRMP24 being accompanied by an Environmental Report containing the findings of the SEA.</p>	<p>The SEA of the revised feasible options, the revised feasible option variants, the preferred options, the preferred programme, the reasonable alternatives and scenarios were used to inform the development of the WRMP24.</p>
	<p>UUW decision making processes for the Draft WRMP24 were set out in the Technical Reports, <i>Option Identification</i>¹⁶ and <i>Deciding on future options</i>¹⁷. This has included environmental considerations, with the SEA findings for</p>	<p>The SEA objectives were used to help inform and refine the high-level (primary) option screening criteria and the more detailed option screening criteria. The high-level screening included three criterion that reflected environmental</p>

¹⁶ UUW (2022) Draft WRMP24 Technical Report – Option Identification. Available online: https://www.unitedutilities.com/globalassets/z_corporate-site/about-us-pdfs/wrmp24-drafts/draft-wrmp24-technical-report---options-identification.pdf

¹⁷ UUW (2022) Draft WRMP24 Technical Report - Deciding on future options. Available online: https://www.unitedutilities.com/globalassets/z_corporate-site/about-us-pdfs/wrmp24-drafts/draft-wrmp24-technical-report---deciding-on-future-options-reupload.pdf

Strategic Environmental Assessment	WRMP24	Relationship
	<p>the revised feasible options having been used as inputs into the following key decision points:</p> <ul style="list-style-type: none"> • detailed screening of the revised feasible options; • Multi-Criteria Analysis (MCA), undertaken in advance of the selection of options; • scenario testing of the constrained options; and • selection of the preferred programme of options 	<p>considerations. The detailed screening included a criterion that explicitly used the findings of the SEA, in terms of outputs from the revised feasible option assessments. The high-level screening led to 120 unconstrained options being screened out, with justifications including: environmental risks, acceptability and insufficient evidence.</p> <p>The findings of the SEA were used as an input into four of the eight decision making metrics used in the MCA of the revised feasible options and the preferred options.</p> <p>The SEA was also used in scenario testing of the selection of the best value options by completing some sensitivity runs using varying effects thresholds.</p> <p>SEA was undertaken of the preferred options and the resultant preferred plan.</p>
<p>The SEA assessed 179 revised feasible options comprising 100 supply options, 42 leakage options, 13 metering options and 24 efficiency options. As part of the post Revised Draft WRMP24 work and reflecting the ongoing development of Strategic Resource Options (SRO), further variants were developed around a limited number of revised feasible options which led to three further options being assessed.</p>	<p>The revised feasible options were assessed against the 17 SEA assessment objectives. The findings of the SEA, WFD Assessment, HRA and BNG and NCA, were considered.</p> <p>Along with ongoing discussion with stakeholders, this information was used to identify potential preferred options.</p>	<p>The revised feasible options were subject to a range of assessments including SEA. The findings of the SEA which were integrated into the MCA helped to identify the preferred options. An assessment of the preferred plan (including the constituent preferred options) was undertaken. The findings of the assessment were presented in the Environmental Reports to accompany the Draft WRMP24, Revised Draft WRMP24 and Final WRMP24.</p>
<p>The SEA included a detailed assessment (including their cumulative effects) of the preferred options that comprise the Preferred Plan, and an assessment of the effects of one reasonable alternative, two alternative plans and several scenarios.</p>	<p>Consultation was undertaken on the draft WRMP24 to incorporate the opinions of stakeholders and customers on the draft WRMP24.</p> <p>Two alternative plans have been considered, identified, and assessed for completeness and in response to consultee requests. However, these are not considered reasonable alternatives.</p>	<p>The findings of the SEA helped to identify the Preferred Plan and selection of component options. The findings of the detailed assessment included mitigation measures that were incorporated into the Final WRMP24.</p>
<p>Reporting</p>		
<p>The key findings of the Environmental Report are presented along with UUWs' response in Table 3.2 below. The extent to which the findings have informed the revised draft WRMP24 is detailed in Section 5 of this Post Adoption Statement.</p>		
<p>Consultation</p>		
<p>Responses to consultation on the Environmental Report are presented along with the UUWs' responses in Section 4 and Appendix B. The extent to which the consultation has informed the Final WRMP24 is detailed in Section 5 of this Post Adoption Statement.</p>		
<p>Monitoring</p>		
<p>The measures for monitoring identified in Section 6 of this Post Adoption Statement will be implemented by UUW.</p>		

3.2 Key Findings of the SEA

3.2.1 As demonstrated in **Table 3.1** above, the SEA process has played an important role in the development of the revised draft WRMP24. The key findings of the Environmental Report are summarised in **Table 3.2** together with UUW’s response.

Table 3.2 Key Findings of the Environmental Report

No.	Key Environmental Report Findings	Response
1	<p>The Final WRMP24 is focussed on delivering three strategic choices:</p> <ul style="list-style-type: none"> achieving the government targets to halve leakage and reduce customer consumption to 110 litres per person per day by 2050; support national planning by developing large-scale water transfers that are adaptable and flexible to the changing needs of other regions; and improve the level of service for temporary use bans (TUBs), halving the expected frequency of occurrence to 1 in 40 years (5% annual chance). Concurrently, UUW will improve the frequency of implementing drought orders and drought permits to 1 in 50 years (2% annual chance). <p>The Final WRMP24 encompasses a combination of preferred demand management, metering and leakage options and a resilience option designed to achieve the three strategic choices.</p>	<p>The findings of the assessment are noted.</p>
2	<p>Overall, the WRMP24 is expected to generate significant positive effects across several of the SEA objectives including climate resilience (SEA Objective 10), economy (SEA Objective 11), health and well-being (SEA Objective 13) and water resources (SEA Objective 14) as the provision of 25 MI/d of water capacity from the new supply option and 291 MI/d from the demand management, efficiency and leakage measures will improve resilience and adaptability to the effects of climate change, support population and economic growth, contribute towards maintaining health and aid sustainable water resource provision.</p>	<p>The findings of the assessment are noted.</p> <p>To maximise benefits to the local economy, UUW will seek, where possible, to appoint local contractors/sub-contractors and use locally sourced materials.</p>
3	<p>Where negative effects have been identified, generally, these are expected to be either minor or moderate only, although uncertainties remain. The exception to this is in respect of air quality (SEA Objective 8), greenhouse gas emissions (SEA Objective 9) and waste and resource use (SEA Objective 15) where significant negative effects have been identified during construction. However, these effects reflect the emissions to air, energy and resource use associated with the implementation of the water management measures which is to a large extent unavoidable (although effects may be reduced at the project stage through, for example, the use of renewable energy and sustainably sourced construction materials).</p> <p>Detailed mitigation and enhancement measures have been identified to help avoid, minimise, reduce or mitigate effects where identified.</p>	<p>The findings of the assessment are noted.</p> <p>Measures to reduce greenhouse gas emissions during construction will be considered including, for example, the use of low(er) embodied carbon materials (including material reuse), low emission plant as well as scheme designs to lower operational energy use.</p> <p>Detailed air quality and transport assessments will be undertaken as part of the Environmental Impact Assessment (EIA) process (if/as required).</p> <p>Measures to mitigate air quality impacts arising from construction activities will be considered within a Construction and Environmental Management Plan. These measures may include, for example, dust suppression, use of lower emissions plant, and monitoring.</p> <p>Opportunities to utilise reused/recycled materials will be considered where appropriate. Construction wastes will also be reused/recycled where possible. Material will be sourced locally where possible.</p>

No.	Key Environmental Report Findings	Response
4	<p>For the option (WR076), there is the potential to result in deterioration of WFD status or prevention of achievement of WFD target status of waterbodies. However, the confidence assigned in the WFD assessment to this conclusion is low. This recognises the risks to compliance that are subject to ongoing assessment through the North West Transfer (NWT) programme of work. However, it is considered feasible that the option may be concluded to be compliant following further assessment.</p>	<p>The findings of the assessment are noted. UUW will undertake further monitoring of potentially affected waterbodies to identify of any compliance issues.</p>
5	<p>The HRA has concluded with very high confidence that there will be no adverse effects, alone or in combination, on the Mersey Estuary SPA/Ramsar and that mobile features of the Mersey Narrows, North Wirral Foreshore SPA/Ramsar and Liverpool Bay SPA/Ramsar will not be exposed to any environmental changes. The HRA states that if no adverse effects alone or in combination are expected for the Mersey Estuary SPA / Ramsar, other European sites in the area (i.e. Ribble and Alt Estuaries SPA/Ramsar, the Mersey Narrows and North Wirral Foreshore SPA/Ramsar, the Dee Estuary SPA/Ramsar, Martin Mere SPA/Ramsar, Morecambe Bay and Duddon Estuary SPA, and Morecambe Bay Ramsar) will not be indirectly affected if / when their qualifying feature populations utilise the Mersey Estuary SPA / Ramsar. No significant effects on biodiversity (SEA Objective 1) have therefore been identified.</p>	<p>The findings of the assessment are noted.</p>
6	<p>Recognising that there are residual uncertainties associated with the preferred supply option, UUW has identified alternatives that provide greater certainty of WFD compliance. Given that the options are broadly of similar scale and providing similar benefit, these quantified effects are comparable with the preferred supply options.</p>	<p>The findings of the assessment are noted.</p>

4. How the opinions expressed in response to the consultation have been taken into account in preparing the Final Plan

4.1 Overview

4.1.1 Consultation has been an integral part of the SEA of WRMP24. This has included the following main stages of consultation:

- consultation with the statutory SEA bodies on the scope of the SEA; and
- formal public consultation on the Environmental Report of the Draft WRMP.

4.1.2 Consultation on the WRMP has included:

- surveys, three consultation events, customer research and engagement activities throughout the process of developing the WRMP24;
- an enhanced pre-consultation with statutory consultees in winter 2021;
- a pre-consultation phase in early 2022, where stakeholders and consultees were contacted via email, which included stakeholders from our previous Water Resources Management Plans and Drought Plans.
- formal consultation on the Draft WRMP (alongside which the SEA Environmental Report was published) between the 7th December 2022 and 15th March 2023; and
- publication of a Statement of Response, outlining how the comments received on the Draft WRMP24 have been taken into account in the development of the final WRMP24.

4.1.3 A summary of the outcomes of the consultation on the SEA and Draft WRMP24 are provided in the sections that follow.

4.2 SEA Consultation

SEA Scoping Consultation

4.2.1 The first stage of the SEA was the production of a Scoping Report. This reviewed plans and programmes that could affect the WRMP24 or be affected by it, outlined baseline information for the plan area and set out the proposed framework for assessing potential environmental effects. Consultation on the scope of the SEA was undertaken by Uuw as part of the integrated approach to developing assessment, working with Water Resource West (WRW). The '*WRW Regional Plan and WRMP24 SEA Scoping Report*' was issued for scoping consultation for 5 weeks from the 8th April and the 13th May 2021. The report was issued for consultation to the statutory consultation bodies (Cadw, the Environment Agency, Historic England, Natural England, Natural Resources Wales and Welsh Government). A workshop was held on the 28th April 2021 to discuss the approaches to which all consultees were invited.

4.2.2 Four responses to the consultation were received. The comments on the SEA Scoping Report were considered and addressed in refinements to the contextual information collected and analysed, the resultant issues identified and linked to the SEA objectives within the proposed assessment framework and the refinement of individual SEA objective guide questions. A schedule of consultation responses to the Scoping Report is contained in **Appendix B** of this PAS (Tables B1 to B4), and repeats the information presented in Appendix B of the Environmental Report for the Final WRMP24.

Public Consultation on the Environmental Report

4.2.3 U UW published its Draft WRMP24 for consultation on the 7th December 2022 for a 14-week consultation period to the 15th March 2023. It was accompanied by the SEA Environmental Report, as part of the technical suite of documents. Responses were received from the Environment Agency and Natural Resources Wales. Key issues included requests for U UW to revise the SEA Environmental Report to:

- include the WRMP24 objectives;
- include consideration of the least cost, best value and best for society and the environment plans;
- detail how in-combination and cumulative effects have been considered;
- demonstrate that there are no significant cross-boundary conflicts or issues that could significantly affect the approval and adoption of the WRMP.

4.2.4 Amendments were made to the SEA Environmental Report, with actions recorded in a schedule of consultation responses (contained in **Appendix B** of this PAS (Tables B5 to B6) and which repeats the information presented in Appendix B of the Environmental Report for the Final WRMP24 and which is also summarised in the Statement of Response.

4.3 Consultation on the Draft WRMP

4.3.1 In winter 2020 U UW completed an enhanced pre-consultation phase with statutory consultees to discuss our approach to WRMP24s' development and initial ambitions of the plan. Pre-consultation with regulators and stakeholders took place in early 2022, where nearly 200 stakeholders and consultees were contacted, including stakeholders from previous WRMPs and Drought Plans. Numerous comments and questions were received during this pre-consultation process, which supported the development of the Draft WRMP24.

4.3.2 The Draft WRMP24 was issued for public consultation for 14 weeks consultation between the 7th of December 2022 and 15th of March 2023. During the consultation process U UW:

- contacted approximately 700 statutory and non-statutory stakeholders directly via email;
- publicised the consultation on the U UW corporate website;
- publicised the consultation through social media platforms;
- held three consultation events (two online, one in Preston);
- met with statutory consultees throughout the process in order to discuss the plan and clarify their consultation comments; and

- Conducted several pieces of customer research (this can be found in the Revised Draft Technical Report – Customer and stakeholder engagement) throughout the development of the draft plan. The results from this research contributed to the development of the revised draft plan.

4.3.3 In total, 26 formal consultation responses were submitted to the Secretary of State from UUW consultees, as well as informal feedback from consultation events and other activities. The consultee organisation and the themes that they raised in their response, is summarised in **Table 4.1** below. A summary of the responses received, and UUWs' replies is available in the Statement of Response¹⁸, with full versions of the consultation responses and UUWs' responses available in Appendix A of the Statement of Response.

Table 4.1 Summary of Consultation Responses Received on the Draft WRMP24

Consultee	Theme(s) of Response
Arqiva	Demand management and leakage
CCW	Levels of service; Demand management and leakage; Water transfers
Cheshire West and Chester Council	General
Canal and Rivers Trust	Decision-making
Cumbria GeoConservation	Environment
Environment Agency	Drought resilience; Supply; Levels of service; Demand management and leakage; Target headroom; Water transfers; Environment; Decision-making; General
Everflow	Demand; Drought resilience
Friends of the Lake District	Environment; Demand management and leakage; Water transfers; Levels of service; Options; General
Greater Manchester Combined Authority	General
Keswick Flood Action Group	Documents; Decision-making; Options; Water transfers; Levels of service
Lancashire County Council	Levels of service; Demand management and leakage; Water transfers; Drought resilience
Mersey Rivers Trust	Levels of service; Demand management and leakage; Water transfers; General
Market Operator Services Ltd	Demand management and leakage
Natural England	Environment; Supply; Decision-making; Demand management and leakage; Water transfers; Drought resilience; Documents; Options
Natural Resources Wales	Environment; Options; Water transfers; Supply
Ofwat	Demand management and leakage; Supply; Options; Decision making; General
Peak District National Park	Demand management and leakage; Levels of service; Water transfers

¹⁸ UUW (2023) *Draft Water Resources Management Plan 2024: Statement of Response*. Available online: https://www.unitedutilities.com/globalassets/documents/corporate-documents/wrmp24_uu_further-information-in-support-of-statement-of-response_redacted.pdf

Consultee	Theme(s) of Response
Strategic Panel & Committees	Demand management and leakage
UK Water Retailer Council	Demand management and leakage
Water Resources West	Water transfers; General
Waterscan	General; Decision-making; Environment; Options; Demand management and leakage; General
WaterWise	Demand management and leakage; Decision-making
Wave Utilities	Demand management and leakage
Welsh Dee Trust	Demand management and leakage
Individual 1	Environment
Individual 2	General

- 4.3.4 Following consultation on the Draft WRMP24, U UW has reviewed its best value plan for WRMP24 and as a result, the preferred plan contained in the Draft WRMP24 was modified. In particular, the number of supply options which made up the preferred plan for the Revised Draft WRMP24 was reduced owing to, in particular, decreased water transfer needs (following the final regional planning reconciliation round).
- 4.3.5 Following a review of the Statement of Response to the consultation and the changes made in the Revised Draft WRMP24, Defra requested more information on the plan. U UW responded to this request in 2024 in the '*Further information in support of Statement of Response (WRMP24)*' document¹⁹.
- 4.3.6 Subsequently, the Secretary of State for Environment, Food and Rural Affairs issued a direction to publish the WRMP to U UW. This stated that the three supply options in the Revised Draft WRMP24 should be removed. These have been replaced by one surface water abstraction supply option.

¹⁹ U UW (2024) *Further information in support of Statement of Response (WRMP24)*. Available online: https://www.unitedutilities.com/globalassets/documents/corporate-documents/wrmp24_uu_further-information-in-support-of-statement-of-response_redacted.pdf

5. The reasons for choosing the WRMP as adopted, in light of the other reasonable alternatives dealt with

5.1 Reasons for the Selection of the Final WRMP

- 5.1.1 UUW has chosen the final WRMP24 using industry good practice methods. This includes consideration of technical feasibility, financial costs and benefits, and quantified impacts on the environment and community, taking into account the findings of the SEA, HRA and WFD Assessment as well as ongoing engagement and input from customers and key stakeholders.
- 5.1.2 UUW considered one reasonable alternative plan, two alternative plans, and several scenarios as part of the development of the Draft WRMP. The preferred plan was selected because it contains all three of the strategic choices proposed by UUW to address customer and stakeholder views. The aforementioned strategic choices relate to:
- Leakage reduction and demand management;
 - Customer preferences relating to levels of service; and
 - Supporting regional and national water resource needs through water transfer.
- 5.1.3 Following consultation on the Draft WRMP24, UUW reviewed its best value plan for WRMP24 and as a result, the preferred plan contained in the Reviewed Draft WRMP24 was modified.
- 5.1.4 There was a decrease in the water trading requirements following the final regional planning reconciliation round. This resulted in a decrease in the number of supply options required. In consequence, the Revised Draft WRMP24 contained three supply options (all groundwater) for the Strategic Resource Zone, all to be implemented by 2030.
- 5.1.5 Further to comments received from regulators on the Draft WRMP24, the preferred plan also included drought permit options taken from UUW's Drought Plan.
- 5.1.6 The Draft WRMP24 included a total of 168 MI/d of exports to STW and WRSE from UUW's SRZ, starting with a 75 MI/d transfer in 2031. Seven supply options were included to support these transfers. Transfers to WRSE were no longer selected in the preferred plan, linked to WRSE companies lowering their demand projections following consultation feedback. STW's need in 2031 also reduced to 25 MI/d. As a consequence of these changes there were fewer supply options in the Revised Draft WRMP24 preferred plan.
- 5.1.7 Following submission of the Revised Draft WRMP24, the Secretary of State subsequently requested further information on the Revised Draft WRMP (December 2023)²⁰, which was provided by UUW alongside updated environmental reports (February 2024). Modelling of some options demonstrated issues with WFD compliance, and so Defra's Direction to Publish letter²¹ indicated that amendments to the preferred options were required. This led to the removal of the three groundwater abstraction supply options and replacement with

²⁰ Letter from Defra Deputy Director, Water Sector Delivery, Defra to UU (no reference) dated December 2023.

²¹ Letter from Defra Deputy Director, Floods and Water, Defra to UU (no reference) dated 06 September 2024.

one surface water supply option. This option has been chosen as it represents the ‘best value’ option.

- 5.1.8 When combined with updates to the demand management measures, this also means that improving U UW’s level of service for temporary use bans (TUBs) is no longer reliant on the dual-purposing of water transfer support options.
- 5.1.9 U UW has developed a number of plan alternatives as part of the process for developing its overall ‘best value’ plan. The alternatives considered in this manner have been the ‘least cost plan’ and ‘best for the environment and society plan’. The alternative plans have been used to provide comparisons during the MCA process. Whilst these plans are not considered equivalent to reasonable alternatives for the purposes of SEA, the potential cumulative effects of the options that comprise the two alternative plans have been considered, identified, and assessed for completeness and in response to consultee requests.
- 5.1.10 In this context, the Final WRMP24 is focussed on delivering three strategic choices:
- achieving the government targets to halve leakage and reduce customer consumption to 110 litres per person per day by 2050;
 - support national planning by developing large-scale water transfers that are adaptable and flexible to the changing needs of other regions; and
 - improve the level of service for temporary use bans (TUBs), halving the expected frequency of occurrence to 1 in 40 years (5% annual chance). Concurrently, U UW will improve the frequency of implementing drought orders and drought permits to 1 in 50 years (2% annual chance).
- 5.1.11 The Final WRMP24 encompasses a combination of preferred demand management, metering and leakage options and a resilience option designed to achieve the three strategic choices
- 5.1.12 Overall, the Final WRMP24 is expected to generate significant positive effects across several of the SEA objectives including climate change, economy, health and well-being and water resources as the provision of 25 MI/d of additional water capacity from the new supply option and 291 MI/d from the demand management, efficiency and leakage measures will improve resilience and adaptability to the effects of climate change, support population and economic growth, contribute towards maintaining health and aid sustainable water resource provision.
- 5.1.13 U UW’s comprehensive option identification and appraisal process means that, from a very large pool of options, only the most applicable have been selected in the Final WRMP24. This is critical to ensuring that the final WRMP24 represents the most cost effective and sustainable solution in the long term.

6. The measures decided concerning monitoring

6.1 Monitoring the Effects of the WRMP

- 6.1.1 The SEA Regulation requires the significant environmental effects of implementing a plan to be monitored. Monitoring the effects of the WRMP can help to answer questions such as:
- Were the SEA predictions of effects accurate?
 - Is the WRMP contributing to the achievement of the SEA objectives?
 - Are mitigation measures performing as well as expected?
 - Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?
- 6.1.2 UUW expect to monitor the effects of the WRMP alongside the other impacts of their operations, and as such, are likely to rely on existing sources of information that are collected either by UUW or by other relevant organisations such as the EA or Natural England.
- 6.1.3 Consistent with the proposals of the Environmental Report, potential effects against all the SEA objectives have been included in the monitoring framework, which is set out in **Table 6.1**. UUW will take a broad view of the findings of their ongoing monitoring processes to identify whether the WRMP has any significant unforeseen effects. Where these are identified, UUW may be required to put in place specific monitoring arrangements and will consider how best to mitigate or avoid the adverse consequences.

Table 6.1 Measures for Monitoring Effects

SEA Objective	Indicator	Source of Information	Indicative Reporting Frequency	Commentary
1. To protect and enhance biodiversity, including designated sites of nature conservation interest and protected habitats and species, enhance ecosystem resilience and habitat connectivity and deliver a net biodiversity gain.	Condition of specific protected sites (e.g. SACs, SPAs, SSSIs)	United Utilities Water (UUW), Environment Agency, Natural England (NE), Natural Resources Wales (NRW)	Annual (subject to data availability)	Additionally, open communication between Environment Agency, NE and UUW results in up-to-date information and identification of any potential issues. NRW included, given the potential to consider sites in Wales.

SEA Objective	Indicator	Source of Information	Indicative Reporting Frequency	Commentary
2. To protect and enhance sustainable natural resources and the ecosystem services they provide.	Biological monitoring (macroinvertebrates, macrophytes, fisheries, bird surveys)	UUW, EA, NRW, Angling clubs, BTO	Annual (subject to data availability)	Using data sets and comparing them against other monitored information such as levels and flows will assist in identifying whether there are any adverse effects and if mitigation measures are performing as well as expected.
	Number and area of new or restored habitats	UUW	Annual	United Utilities could consider recording the number of locations and area of habitats created or restored.
3. To avoid and, where required, manage invasive and non-native species (INNS).	INNS presence	UUW, NBN Atlas and the EA's Ecology & Fish Data Explorer website	Annual (subject to data availability)	UUW are undertaking INNS RA using the EA Aquatic INNS Risk Assessment Tool (SAI-RAT) for the NWT SRO, and could consider its ongoing update for selected options, taken forward for Gate 3.
4. To protect and enhance soil quantity, quality and functionality and geodiversity and ensure the appropriate and efficient use of land.	Area of previously undeveloped land used during construction	UUW	Annual	UUW could record the area of previously undeveloped land that is built on as a result of the WRMP24 scheme, linked to biodiversity net gain/resilience assessment completed.
	Condition of sites designated for geological interest (e.g. geological SSSIs) on water industry land holdings	UUW, NE, NRW	Annual (subject to data availability)	Previous studies may also be used to inform monitoring and assessment. NRW included, given the potential to consider sites in Wales.
5. To protect and enhance surface and ground water levels and flows.	River flows, river levels, lake and reservoir levels. Groundwater levels, recharge characteristics and abstracted groundwater quality	UUW, EA, NRW	Annual (subject to data availability)	Previous studies may also be used to inform monitoring and assessment. e.g. WINEP, plus additional studies and investigations being commissioned such as the Manchester and East Cheshire groundwater model.
6. To protect and enhance the quality of surface and groundwater resources.	Water quality of surface and ground water.	UUW, EA, NRW	Annual (subject to data availability)	Previous studies may also be used to inform monitoring and assessment.
7. To reduce or manage flood risk.	Number of properties that experience internal flooding from public sewers	UUW, EA, NRW	Annual	UUW report these data to Ofwat as part of the statutory returns process.

SEA Objective	Indicator	Source of Information	Indicative Reporting Frequency	Commentary
8. To minimise emissions of pollutant gases and particulates and enhance air quality.	Number of vehicle movements/distance travelled	UUW	Annual	UUW could consider recording the number of vehicle movements and distance travelled as an indicator of air quality impacts during implementation.
9. To reduce greenhouse gas emissions.	Quantity of greenhouse gas emissions per megalitre of water supplied.	UUW	Annual	UUW energy managers can use company data, and guidance from the UKWIR greenhouse gas workbook and BEIS (Department for Business, Energy & Industrial Strategy) conversion factors to derive this information. Potential to supplement with any monitoring information gathered in support of UUW's Climate Change Mitigation Strategy
	Energy use used in the operation of options.	UUW	Annual	UUW should hold and record energy consumption data e.g. via accounts / invoices.
	Renewable energy generated or purchased.	UUW	Annual	UUW should record renewable energy generation data, in addition to data on renewable energy purchased e.g. via accounts / invoices.
10. To adapt and improve resilience to the threats of climate change.	Number of properties that experience internal flooding from public sewers	UUW, EA, NRW	Annual	UUW report these data to Ofwat as part of the statutory returns process. Potential to supplement with any monitoring information gathered in support of UUW's Climate Change Mitigation Strategy.
11. To promote a sustainable economy and maintain and enhance the economic and social well-being of local communities.	Number of UUW sites with public access which provide sporting, recreational and leisure resources and number of visits per year.	UUW	Annual	UUW hold information on the number of annual visitors to sites where specific visitor facilities are provided. These could be analysed to determine effects of operation on visitor use.
	Planned residential new development (informing predicted growth forecast to target catchments requiring investigations for potential future capacity constraints).	UUW	Annual	UUW examine information on planned growth and forecasts across LPA within the area.

SEA Objective	Indicator	Source of Information	Indicative Reporting Frequency	Commentary
12. To maintain and enhance tourism and recreation.	Number of U UW sites with public access which provide sporting, recreational and leisure resources and number of visits per year.	U UW	Annual	U UW hold information on the number of annual visitors to sites where specific visitor facilities are provided. These could be analysed to determine effects of operation on visitor use.
13. To protect and enhance human health and well-being.	Compliance with drinking water standards at customers' taps (%).	U UW	Annual	U UW reports these data to Ofwat as part of the statutory returns process (Annual Performance Report) and to the Drinking Water Inspectorate.
	Compliance with water quality standards under the EC Bathing Waters Directive.	Environment Agency		Environment Agency monitors the compliance of bathing waters and report this annually.
	Number of nuisance-related complaints e.g. noise, dust.	U UW	Annual	U UW could record the number of nuisance-related complaints made in relation to implementation of the WRMP.
	Pollution and flooding Incidents	U UW, Environment Agency	Annual	U UW measure the number of pollution incidents per year and keep a record of all flooding incidents per year and maintain a list of intermittent discharges.
14. To promote and enhance the sustainable and efficient use of resilient water resources.	Leakage Water saved through demand management/ water efficiency measures	U UW	Annual	U UW report these data to Ofwat as part of the annual returns process.
15. To minimise waste, promote resource efficiency and move towards a circular economy.	Amount of recycled / reused materials used	U UW (contractors/consultants)	Annual	Information on the use of recycled / reused materials should be held by construction managers and accounts (contractors / consultants accounts, waste or procurement records).
	Proportion of waste sent to landfill	U UW (services data)	Annual	Information on waste disposal to landfill should be held by U UW.

SEA Objective	Indicator	Source of Information	Indicative Reporting Frequency	Commentary
	Chemical use in water treatment	UUW (services data)	Annual	Information (quantities, composition) on chemical use should be held in accounts.
16. To conserve and enhance the historic environment including the significance of heritage assets and their settings and archaeological important sites.	Loss / damage or discovery / protection of cultural, historic and industrial heritage features.	UUW, Historic England, Cadw, Local Planning Authority (LPA)	Annual	Historic England, the LPA and Cadw monitor the condition of all statutorily protected monuments.
17. To conserve, protect and enhance landscape and townscape character and visual amenity.	Loss or damage to landscape character and features of designated sites.	UUW	Annual	UUW could record the number and size of infrastructure built within designated landscape sites.

Appendix A

SEA Compliance

Table A.1 details the SEA Regulations’ requirements of the Post Adoption Procedures and indicates where relevant information required can be found in this report.

Table A.1 Compliance of this report with the requirements of the SEA Regulations

SEA Regulations Requirement	Location in the Post Adoption Statement (where appropriate)
Information as to adoption of plan or programme (SEA regulation 16)	
<p>(1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall -</p> <p>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and</p> <p>(b) take such steps as it considers appropriate to bring to the attention of the public</p> <p style="padding-left: 20px;">(i) the title of the plan or programme;</p> <p style="padding-left: 20px;">(ii) the date on which it was adopted;</p> <p style="padding-left: 20px;">(iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;</p> <p style="padding-left: 20px;">(iv) the times at which inspection may be made; and</p> <p>(v) that inspection may be made free of charge.</p>	<p>A copy of the final WRMP24 and accompanying reports and documentation is available at:</p> <p>https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/</p>
<p>(2) As soon as reasonably practicable after the adoption of a plan or programme -</p> <p>(a) the responsible authority shall inform—</p> <p style="padding-left: 20px;">(i) the consultation bodies;</p> <p style="padding-left: 20px;">(ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and</p> <p style="padding-left: 20px;">(iii) where the responsible authority is not the Secretary of State, the Secretary of State;</p> <p>and</p> <p>(b) the Secretary of State shall inform the Member State with which consultations in relation to the matters referred to in paragraph 3.</p> <p>(3) The matters are -</p> <p style="padding-left: 20px;">(a) that the plan or programme has been adopted;</p> <p style="padding-left: 20px;">(b) the date on which it was adopted; and</p> <p style="padding-left: 20px;">(c) the address (which may include a website) at which a copy of—</p> <p style="padding-left: 40px;">(i) the plan or programme, as adopted,</p> <p style="padding-left: 40px;">(ii) its accompanying environmental report, and</p>	<p>A copy of the final WRMP24 and accompanying reports and documentation is available at:</p> <p>https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/</p> <p>This Post Adoption Statement addresses 3(iii) and contains particulars specified in paragraph (4) as outlined below.</p>

SEA Regulations Requirement	Location in the Post Adoption Statement (where appropriate)
(iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.	
(4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are -	
(a) how environmental considerations have been integrated into the plan or programme;	Section 2
(b) how the environmental report has been taken into account;	Section 3
(c) how opinions expressed in response to - (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), - have been taken into account;	Section 4 and UUWs Statement of Response, available at: https://www.unitedutilities.com/globalassets/z_corporate-site/about-us-pdfs/wrmp24-drafts/uuw-draft-wrmp24-statement-of-response1.pdf https://www.unitedutilities.com/globalassets/documents/corporate-documents/wrmp24_uu_further-information-in-support-of-statement-of-response_redacted.pdf
(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;	Not applicable - no transboundary consultation with EU Member States took place
(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and	Section 5
(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Section 6.
Monitoring of implementation of plans and programmes (SEA regulation 17) Content	
(1) The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.	Monitoring procedures are set out in Section 6. UUW will identify effects and undertake remedial action (as necessary) as the WRMP24 is implemented.
(2) The responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1).	The monitoring procedures set out in Section 6 will complement existing monitoring arrangements where possible.

Appendix B

Schedule of Consultation Response

Consultation on the SEA Scoping Report

Consultation on the WRW Regional Plan and WRMP24s environmental assessment methodologies took place between the 8th April and the 13th May 2021.

To support the consultation, a series of method statements for the proposed approaches to undertaking the environmental assessments of the respective plans were issued and comments invited. These were for:

- Strategic Environmental Assessment (SEA) – SEA Scoping Report and four separate appendices presenting contextual information for DCWW, STW, SSW and U UW
- Habitats Regulations Assessment (HRA) – HRA Method Statement
- Water Framework Directive (WFD) Assessment – WFD Assessment Methodology Statement
- Natural Capital/Environmental Resilience – Assessment Methodology.

The method statements were issued to Cadw, the Environment Agency, Historic England, Natural England, Natural Resources Wales and Welsh Government.

A workshop was held on the 28th April 2021 to discuss the approaches to which all consultees were invited.

Responses were received to all Method Statements. The comments on the WFD Assessment Methodology Statement were material to the proposed approach, and in consequence, a revised Methodology was issued (for information) to the regulators on the 21st July 2021. Comments on the remaining three method statements did not require substantive revision. Each has then been summarised in a separate note. This note presents the responses to the SEA Scoping Report.

Responses to the SEA Scoping Report were received from Cadw, the Environment Agency, Natural England and Natural Resources Wales.

Table B.1 – B.4 presents a summary of these responses.

Consultation on the Environmental Report

U UW published its Draft WRMP24 for consultation between the 7th December 2022 and 15th March 2023. It was accompanied by the SEA Environmental Report, as part of the technical suite of documents.

Responses were received from the Environment Agency and Natural Resources Wales.

Table **B5 and B6** present a summary of these responses.

Table B.2 Responses to Cadw comments on the SEA Scoping Report

Consultation Question	Section	Consultee Response	Response/Action
<p>Q1. Do you think that the Scoping Report sets out sufficient information to provide the context for the SEAs of the draft WRW Regional Plan and WRMP24s in terms of an overview of each plan, the review of relevant plans and programmes and baseline evidence and analysis? If not, what additional information should be included?</p>	<p>Section 2.2/Table 2.1/Section 2.3/Table 2.2/Appendix E</p>	<p>No</p> <p>Cadw is of the opinion that the following documents should be amended or added as stated.</p> <p><u>Table 2.1 National Programmes</u></p> <p>Change:</p> <ul style="list-style-type: none"> Welsh Government (2018) Planning Policy Wales (Edition 10) has been replaced by Welsh Government (2021) Planning Policy Wales (Edition 11). <p>Add:</p> <ul style="list-style-type: none"> Welsh Government (2017) Technical Advice Note 24 The Historic Environment Welsh Government (2018) Priorities for the Historic Environment of Wales Welsh Government (2020) Historic Environment and Climate Change in Wales <p><u>Table 2.2 Cultural Heritage</u></p> <p>Change:</p> <ul style="list-style-type: none"> Welsh Government (2018) Planning Policy Wales (Edition 10) has been replaced by Welsh Government (2021) Planning Policy Wales (Edition 11). <p>Add:</p> <ul style="list-style-type: none"> Historic Environment (Wales) Act Welsh Government (2017) Technical Advice Note 24 The historic Environment Welsh Government (2018) Priorities for the Historic Environment of Wales Welsh Government (2020) Historic Environment and Climate Change in Wales <p>The above documents should also be included and reviewed in Appendix E along with the documents below:</p> <p><u>Regional Plans and Programmes</u></p> <ul style="list-style-type: none"> Welsh Government (2018) Castles and Town Walls of King Edward in Gwynedd World Heritage Site: World Heritage Site Management Plan 2018 -28 Wrexham County Borough Council British Waterways and the Royal Commission on the Ancient and Historical 	<p>Comments noted.</p> <p>Welsh Government (2018) Planning Policy Wales (Edition 10) will be replaced by Welsh Government (2021) Planning Policy Wales (Edition 11) in the review of plans and programmes in the Environmental Report.</p> <p>The following additional national-level plans and programmes will be included in the relevant tables and appendix of the relevant Environmental Report issued to accompany the WRW Regional Plan and draft WRMP24s:</p> <ul style="list-style-type: none"> Welsh Government (2017) Technical Advice Note 24 The Historic Environment Welsh Government (2018) Priorities for the Historic Environment of Wales Welsh Government (2020) Historic Environment and Climate Change in Wales <p>The following additional regional-level plans and programmes will be included in the relevant Environmental Report issued to accompany the WRW Regional Plan and draft WRMP24s:</p> <ul style="list-style-type: none"> Welsh Government (2018) Castles and Town Walls of King Edward in Gwynedd World Heritage Site: World Heritage Site Management Plan 2018 -28 Wrexham County Borough Council British Waterways and the Royal Commission on the Ancient and Historical Monuments of Wales (2012) Pontcysyllte Aqueduct and Canal World Heritage Site – Management Plan Torfaen County Borough Council (2011) Blaenavon Industrial Landscape World Heritage Site Management Plan <p>The changes and additions to the review of plans and programmes have been reflected Table 2.1/Appendix C of this Environmental Report.</p>

Consultation Question	Section	Consultee Response	Response/Action
<p>Q2. Do you agree that the main environmental issues identified are relevant to the SEAs of the draft of the draft WRW Regional Plan and WRMP24s? If not, which issues do you think need to be included or excluded?</p>	N/A	<p>Yes</p> <ul style="list-style-type: none"> • Monuments of Wales (2012) Pontcysyllte Aqueduct and Canal World Heritage Site – Management Plan • Torfaen County Borough Council (2011) Blaenavon Industrial Landscape World Heritage Site Management Plan 	Comment noted.
<p>Q3. Do you agree with the proposed approach to the SEAs of the draft WRW Regional Plan and WRMP24s? Are the proposed SEA objectives, guide questions and significance thresholds appropriate for the scope of each plan assessment? If not, which objectives/guide questions should be amended and which other objectives/guide questions do you believe should be included?</p>	N/A	Yes	Comment noted.

Table B.3 Responses to Environment Agency’s comments on the SEA Scoping Report

Consultation Question	Section	Consultee Response	Response/Action
Q1. Do you think that the Scoping Report sets out sufficient information to provide the context for the SEAs of the draft WRW Regional Plan and WRMP24s in terms of an overview of each plan, the review of relevant plans and programmes and baseline evidence and analysis? If not, what additional information should be included?	Section 1.4	S 1.4.12 (p20) – good to see specific reference to RAPID SRO’s, please replicate across all the environmental assessments	Comment noted.
	Section 3.2/Table 3.1	Table 3.1 (p37) – needs to recognise the pressures on Public Water Supply in WR West patch as well as in WR East / WR South East. For example, our National Framework shows pressure equivalent to around 640 MI/d in WR West and 570 MI/d in WR East at 2050.	<p>Comment noted.</p> <p>Reference to increased pressure on Public Water Supply in the WRW area will be included in the ‘Summary of Key Issues’ table in the Environmental Reports issued to accompany the WRW Regional Plan and draft WRMP24s.</p> <p>This issue has been reflected in Table 3.1 and Table NTS.1 of this Environmental Report.</p>
	Section 4.4	S 4.4 (p47) – please add information to explain how interactions with environmental assessment work in neighbouring companies / regional groups will work.	<p>Comment noted.</p> <p>Information explaining how interactions with environmental assessment work in neighbouring companies and regional groups will be included in the Environmental Reports issued to accompany the WRW Regional Plan and draft WRMP24s, as relevant and appropriate.</p> <p>This information has been presented within the ‘<i>Assessment of Secondary, Cumulative and Synergistic Effects</i>’ subsection under Section 4.4 of this Environmental Report.</p>
Q2. Do you agree that the main	N/A	The SEA needs to recognise that we are in the midst of a climate emergency – every option and the overall plan(s) needs to be	Comment noted.

Consultation Question	Section	Consultee Response	Response/Action
<p>environmental issues identified are relevant to the SEAs of the draft of the WRW Regional Plan and WRMP24s? If not, which issues do you think need to be included or excluded?</p>		<p>viewed through this lens. We need to consider the 2019 amends to the 2008 Climate Change Act and recent Government announcements to cut carbon emissions further and faster ie 78% by 2035. WR West plan and the core company WRMP's will need to demonstrate how their actions are helping us achieve this.</p>	<p>Climatic factors are scoped into the SEA, with international, national and regional plans and programmes reviewed, with the resultant issues identified relevant to the assessment of the WRW Regional Plan and the WRMPs. SEA objectives concerning the reduction in greenhouse gas emissions along with the improvement of climate resilience are included in the Assessment Framework, along with associated guide question and thresholds.</p> <p>The review of plans and programmes will be updated in the Environmental Report to reflect the 2019 updates to the Climate Change Act 2008.</p> <p>The comment relating to the need for the WRW Regional Plan and the WRMPs to demonstrate how their actions will contribute to the achievement of carbon emissions reduction targets set by the government, relates to the WRW Regional Plan and WRMPs themselves, rather than the SEA of the plans, although where such effects occur, these may also be set out in the appropriate Environmental Report.</p> <p>The 2019 updates to the Climate Change Act 2008 have been reflected Table 2.1/Appendix C of this Environmental Report.</p>
	Appendix B Section 3. p34	<p>It is stated on p34 that one of the key issues relevant to the WRMP is, 'The need to maintain and improve the quantity and quality of GW resources taking into account WFD status targets'. I have added the words and improve to the sentence as I believe this should also be the aspiration.</p>	<p>Agreed and will be updated in the relevant Environmental Report.</p> <p>This change has been reflected in Table 3.1 and Table NTS.1 of this Environmental Report.</p>
<p>Q3. Do you agree with the proposed approach to the SEAs of the draft WRW Regional Plan and WRMP24s? Are the proposed SEA objectives, guide questions and significance thresholds appropriate for the scope of each plan assessment? If not, which objectives/guide questions should be amended and which other</p>	Appendix F	<p>most of the thresholds are not quantified and this means the outcomes will for the most part be subjective / qualitative. We'd expect demand for water to be quantifiable e.g. in MI/d and/or % Distribution Input. We quantify flood risk in terms of properties protected and environmental enhancement by (say) km of river improved and/or improvements to Waterbody status (or improvements to elements within waterbody status). WR West should consider if more quantified thresholds can be used.</p>	<p>Comment noted.</p> <p>The 'Definitions and Thresholds of Significance' set out in Appendix F of the Scoping Report, are considered to provide a balance of both quantitative and qualitative measures (as per UKWIR Guidance) which help to ensure a consistent approach to interpreting the significance of effects and helps the reader understand the decisions made by the assessor.</p> <p>In developing the definitions and thresholds of significant effects, information has been drawn from:</p> <ul style="list-style-type: none"> the previous definitions and thresholds used in the SEAs of DCWW, SSW, STW and UJW's WRMP19s; suggested definitions and thresholds for assessment scoring from the All Company Working Group (ACWG) for application to the SROs; suggested definitions and thresholds detailed in the WRSE Scoping Report, for application to the SEA of the WRSE Regional Plan; and,

Consultation Question	Section	Consultee Response	Response/Action
objectives/guide questions do you believe should be included?			<ul style="list-style-type: none"> an evaluation of the range of quantitative values (such as yield, capex, embodied carbon, operational carbon and material quantities) available for a selection of the DCWW, STW, SSW and UJW WRMP19 options for different option types (e.g., supply-side options such as reservoirs, transfers, boreholes, enhanced treatment).
			<p>The proposed thresholds include reference to yield (Ml/d), design capacity (Ml/d), capex (£m), embodied and operational carbon (tCO2e), flood risk (% site in FZ3), air quality (AQMA) and water quality (WFD status). These quantified measures address and go beyond the examples cited in the consultee response.</p>
			<p>However, in order to ensure, no opportunity is lost to take into account the point made, consideration will be given to whether any additional quantifiable measures can be utilised in the assessment and any additional measures that are identified will be highlighted in the Environmental Reports to accompany the WRW Regional Plan and draft WRMP24s, as relevant and appropriate.</p>
	Table 4.2/Appendix F	<p>Under SEA Table 4.2 & Appendix F there is no mention specifically of geomorphology.</p> <p>Flow abstraction and associated infrastructure is likely to affect fluvial sediment transport regime (transport, erosion, deposition), channel character (morphology) and river behaviour (morphodynamics).</p> <p>Objective 5 - Request that the following question be included in relation to water resource pressures on geomorphic/sediment systems:</p> <ul style="list-style-type: none"> Will it alter the sediment transport regime of the surface waters? <p>(i.e. Will it result in a change in fine sediment deposition? Will it result in a change in sediment flux?)</p>	<p>Comment noted.</p> <p>Whilst absent from Table 4.2 of the Scoping Report, geomorphology is highlighted as a key issue in WRMP specific baselines e.g., Appendix A, where the “<i>the need to protect, maintain and enhance geomorphological functions and services</i>” is identified.</p> <p>To ensure it is appropriately reflected in the SEA, and to minimise any unintended duplication, the following guide question will be added to the Assessment Framework under Objective 1 (Biodiversity):</p> <p><i>Will it alter geomorphological forms and processes which underpin physical habitat for aquatic ecosystems?</i></p> <p>The WFD Assessment (Stage 3 Impact Assessment) also includes consideration of geomorphology through the source-pathway-receptor approach to identifying effects. The source of change would be the construction or operational activity. The pathway would include physical environment changes such as water level change, flow velocity change, morphological change. The receptor would be the WFD status element or the WFD protected area. Where relevant, such information will be used to inform the assessment of any options against the above guide question.</p> <p>The additional guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p>

Consultation Question	Section	Consultee Response	Response/Action
	Table 4.2/Appendix F/ Section 3.1 (Appendix D)	<p>Appendix F, Objective 3 talks about preventing the spread/introduction of INNS. Would it also be possible to include a guide question around eradication of INNS where they are already present and to do so is technically and economically feasible?</p> <p>Same applies to the key issues listed on page 19 of Appendix D.</p>	<p>Comment noted.</p> <p>The following guide question will be added to the assessment framework under Objective 3:</p> <p><i>Will it contribute to the eradication of invasive and non-native species, where they are already present and it is technically and economically feasible to do so?</i></p> <p>However, it may only be applicable in highly specific circumstances.</p> <p>The key issues relating to Biodiversity (set out in section 3.1 of Appendix D) will also be amended to highlight the need to eradicate INNS where already present.</p> <p>The additional guide question is reflected in Table 4.2 and Appendix E of this Environmental Report. The need to eradicate INNS is reflected as a key issue within Table 3.1, Table NTS.1 and Appendix D (within the ‘Key Issues Relevant to the WRMP’ subsection of the ‘Biodiversity, Flora and Fauna’ section) of this Environmental Report.</p>
	Table 4.2/Appendix F	Table 4.2 – there is no reference to impact on geomorphology. A question on this should be included to reflect potential changes in flow regimes.	<p>Comment noted.</p> <p>Table 4.2 includes two guide questions under SEA Objective 5, that reference flow:</p> <ul style="list-style-type: none"> • <i>Will it result in changes to river flows, wetted width or river levels?</i> • <i>Will it alter the flow regime of surface waters?</i> <p>In response to a separate comment, the first guide question will be amended to the following ‘<i>Will it result in changes to river flows, channel morphologies, wetted width or river levels?</i>’</p> <p>Whilst absent from Table 4.2 of the Scoping Report, geomorphology is highlighted as a key issue in WRMP specific baselines e.g., Appendix A, where the “<i>the need to protect, maintain and enhance geomorphological functions and services</i>” is identified.</p> <p>The WFD Assessment (Stage 3 Impact Assessment) also includes consideration of geomorphology through the source-pathway-receptor approach to identifying effects. Where relevant, such information will be used to inform the assessment of any options against the above guide questions.</p>

Consultation Question	Section	Consultee Response	Response/Action
	Table 4.2/Appendix F	<p>Appendix F, Objective 1. Request that the following question be included: Will it alter geomorphological forms and processes which underpin physical habitat for aquatic ecosystems?</p>	<p>The revision to the guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p> <p>Comment noted.</p> <p>To ensure it is appropriately reflected in the SEA, the following guide question will be added to the Assessment Framework under Objective 1 (Biodiversity):</p> <p><i>Will it alter geomorphological forms and processes which underpin physical habitat for aquatic ecosystems?</i></p> <p>The WFD Assessment (Stage 3 Impact Assessment) also includes consideration of geomorphology through the source-pathway-receptor approach to identifying effects. Where relevant, such information will be used to inform the assessment of any options against the above guide question.</p> <p>The additional guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p>
	Table 4.4	<p>Table 4.4 – we note that an option cannot be scored as “moderate impact” within the UU Sources SRO SEA work but this scoring (moderate) can be applied to the same option in WRW SEA. What is the reason for this difference, especially given WRW will be scoring some of the same options included in UU Sources SRO?</p>	<p>Comment noted.</p> <p>The UU Sources SRO Gate 1 SEA was undertaken in advance of the publication of the All Company Working Group (ACWG) guidance on SEA (2020) and the UKWIR Environmental Assessment Guidance for Water Resources Management Plans and Drought Plans (2021).</p> <p>The approach to assessing the likely significant effects of the WRP24s and WRW Regional Plan includes the identification of minor, moderate and major/significant positive and negative effects, reflecting the guidance, not previously available to the UU Sources SRO. Definitions and thresholds for minor, moderate and major/significant effects, are included, which have used information drawn from:</p> <ul style="list-style-type: none"> the previous definitions and thresholds used in the SEAs of DCWW, SSW, STW and UUUW’s WRMP19s; suggested definitions and thresholds for assessment scoring from the ACWG for application to the SROs; suggested definitions and thresholds detailed in the WRSE Scoping Report, for application to the SEA of the WRSE Regional Plan; an evaluation of the range of quantitative values (such as yield, capex, embodied carbon, operational carbon and material quantities) available for a selection of the DCWW, STW, SSW and UUUW WRMP19 options for

Consultation Question	Section	Consultee Response	Response/Action
			<p>different option types (e.g., supply-side options such as reservoirs, transfers, boreholes, enhanced treatment).</p> <p>Where the WRMP24 assessment is of a SRO option or a revised WRMP19 option, the assessment will take into account, where appropriate, the previous assessment findings and any regulators and stakeholder feedback already received. See for example reference to the STT SRO and Gate and 2 assessments in Section 6.7 of this Environmental Report.</p>
	Table 4.2/Appendix F	<p>Appendix F, Objective 5. Suggest amendment to question 2:</p> <ul style="list-style-type: none"> Will it result in changes to river flows, <u>channel morphologies</u>, wetted width or river levels? 	<p>Agreed.</p> <p>The second guide question under SEA Objective 5 of the assessment framework will be changed to:</p> <p><i>Will it result in changes to river flows, <u>channel morphologies</u>, wetted width or river levels?</i></p> <p>The revision to the guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p>
	N/A	<p>WR West should explain the scale being used to decide significance. For example, a 1 Ml/d demand saving option may be significant within a small water resource zone but relatively insignificant when viewed across WR West patch as a whole. A better explanation of this would be appreciated.</p>	<p>Comment noted.</p> <p>WRW is taking an integrated approach to preparing the Regional Plan and the WRMP24s. WRW member water companies are using a regionally consistent set of methodologies to reflect local, regional and national needs in the development of the plans. The definitions of significance have been developed so that they can apply to the SEA of each of the plans, whether the WRW Regional Plan or the individual WRMPs to ensure a consistent approach to interpreting the significance of effects. In developing the approach to thresholds, cognisance was taken of:</p> <ul style="list-style-type: none"> the previous definitions and thresholds used in the SEAs of DCWW, SSW, STW and UJW's WRMP19s; suggested definitions and thresholds for assessment scoring from the ACWG for application to the SROs; suggested definitions and thresholds detailed in the WRSE Scoping Report, for application to the SEA of the WRSE Regional Plan; an evaluation of the range of quantitative values (such as yield, capex, embodied carbon, operational carbon and material quantities) available for a selection of the DCWW, STW, SSW and UJW WRMP19 options for different option types (e.g., supply-side options such as reservoirs, transfers, boreholes, enhanced treatment).
	Table NTS.2/Table 4.2/Appendix F	Table 2 NTS – Proposed objectives – why only where required for INNS?	Comment noted.

Consultation Question	Section	Consultee Response	Response/Action
			The use of the wording 'where required' is intended to reflect source options where INNS may be present, or where transfer methods, such as unenclosed water bodies could lead to INNS being introduced, and so requiring management and mitigation measures prior to the introduction into a new catchment.
	Table 2.2/Table 4.2/Appendix F	No specific measurable objective to reduce operational or embodied carbon. This appears to be a reoccurring theme with water company plans. Table 2.2 highlights the relevance of carbon reduction targets to the Plan(s), however although the assessment questions in Table 4.2 reflect the need it would be good to see this reflected more specifically in the objectives.	<p>No change. Comment noted.</p> <p>Whilst there is no objective relating to the reduction of operational and embodied carbon specifically, it is considered that this is already covered by Objective 9: <i>To reduce greenhouse gas emissions</i>. Furthermore, as noted in the comment, the need to reduce operational and embodied carbon emissions is reflected within the guide questions for Objective 9 and specific values/thresholds for assessing plan options/measures against this Objective, in terms of their embodied and operational carbon emissions (tCO₂e and tCO₂e/year respectively) are provided in Appendix F.</p>
	Table 4.2/Appendix F	WFD – although implied in the objectives, it would be good to see “contributing to WFD objectives” reflected more specifically. Consider modifying the assessment questions in Table 4.2 to address this point.	<p>No change. Comment noted.</p> <p>Contribution to the achievement of WFD objectives is already specifically reflected in the guide questions for Objective 6 (Water Quality).</p>
4. Have the consultants missed any key plans/programmes (our own or 3rd party ones like Rivers Trusts maybe?) from your local perspective?		Should options being proposed by WRW core companies for Ofwat “Green Recovery funding” be considered within the assessment?	<p>Comment noted.</p> <p>WRW aims to provide a Regional Plan that is multi-sector and takes account of the water supply needs of non-public water supply (non-PWS) abstractors as well as public water supplies. All options being considered by the core member water companies for inclusion in the WRMP24s and Regional Plan will be assessed.</p>
	Section 2 (Appendices A, B, C and D)	There is a lack of consistency between the core company lists of relevant plans/programmes that needs to be addressed. Focussing on the companies wholly/mainly in England, UU’s list of relevant plans and programmes appears to be the most comprehensive and should be used as a guide for SvT and SSW too. As a minimum, reference needs to be made to a company’s own WRMP and Drought Plan plus the WRMPs and Drought Plans of neighbouring companies. Natural England’s Site Improvement Plans for Natura 2000 sites are also key documents to consider across the board.	<p>Comment noted. The lists of relevant plans and programmes within each of the core company appendices will be checked/cross referenced to ensure consistency in the Environmental Reports to accompany the WRW Regional Plan and draft WRMP24s.</p> <p>This is reflected in Table 2.1/Appendix C of this Environmental Report.</p>
		Need to ensure consistency with SRO SEAs and other initial assessments. Gate 1 reports will help with this.	Comment noted.

Consultation Question	Section	Consultee Response	Response/Action
			<p>Where the WRMP24 assessment is of a SRO option or a revised WRMP19 option, the assessment will take into account, where appropriate, the previous assessment findings and any regulators and stakeholder feedback already received. See for example reference to the STT SRO and Gate and 2 assessments in Section 6.7 of this Environmental Report.</p>
	Section 2/Table 2.1/Appendix E	Refers to some plans/strategies from early 2000's (e.g. BEIS, Defra) – are these still the best available on those topics?	<p>Over 200 international/European, national, regional/sub-regional and local level plans were reviewed during the preparation of the Scoping Report.</p> <p>Whilst the review of plans and programmes contains some older plans and programmes, these have been included as they are still valid and are relevant to the SEA of the WRW Regional Plan and WRMPs.</p> <p>Should revised or updated plans/programmes become available during the preparation of the Environmental Report, they will be included.</p> <p>This is reflected in Table 2.1/Appendix C of this Environmental Report.</p>
	Section 2/Table 2.1/Appendix E	Some thoughts on important national plans/programmes/legislation that seemed to be missing...2020 Defra Drought Plan Direction; 2nd UK Climate Change Risk Assessment (CCRA2) 2017 (HM Gov); EA 2020 consultation on update to areas of water stress; EA/Ofwat/NRW WR Planning Guideline 2021; HM Gov 2020 National Infrastructure Strategy; CEFAS/EA/NRW assessment of salmon stocks and fisheries in Eng&Wales (2019). Not a comprehensive list but some key ones that sprung to mind that I couldn't see in the SEA Scoping Report.	<p>Comment noted.</p> <p>The following additional plans and programmes will be included in the review of plans and programmes contained within the Environmental Report:</p> <ul style="list-style-type: none"> • Defra (2020) Drought Plan Direction 2020 • HM Government (2017) 2nd UK Climate Change Risk Assessment (CCRA2) • Centre for Environment Fisheries and Aquaculture Science (CEFAS), Environment Agency and Natural Resources Wales (2019) Assessment of Salmon Stocks and Fisheries in England and Wales 2019 <p>Since scoping consultation, the third UK Climate Change Risk Assessment (CCRA3) evidence report has been published and has also been referenced as appropriate in the baseline information. CEFAS has also produced 2020 versions of the two reports identified, and these have been referenced as appropriate.</p> <p>To avoid undue reliance on draft versions of plans and programmes that could be subject to change, consultation documents and draft legislation are not included in the plans and programmes reviewed, unless highly relevant e.g., the Water Resources Planning Guidelines.</p>

Consultation Question	Section	Consultee Response	Response/Action
			<p>The changes and additions to the review of plans and programmes have been reflected Table 2.1/Appendix C of this Environmental Report.</p>
	Appendix E	<p>See comments about plans/programmes under water company headings. We expect to see a greater degree of consistency in the plans / programmes being considered across the core water companies in WR West and the regional plan as a whole.</p>	<p>Comment noted.</p> <p>Plans and programmes will be reviewed to ensure consistency between the categories of plans considered, noting regional/sub-regional differences.</p> <p>This is reflected in Table 2.1/Appendix C of this Environmental Report.</p>
	N/A	<p>A few further general points cutting across environmental assessments:-</p> <ul style="list-style-type: none"> • Important to seek joint Flood and Coastal Risk Management and Water Resources options to improve cost benefit and collaboration. • WRW should actively work with non PWS stakeholders such as agriculture sector to promote storage techniques and improve overall resilience / adaptation to prolonged dry weather. • Objectives should include delivering more efficient and targeted use of available water banks, whether for purpose of regulation / abstraction, through improved modelling, monitoring, and control. This includes consideration of the use of new 5g technology. • Assessment methodology should include climatic risks to critical infrastructure. For example, greater stress pressures from cyclic loading (fill / refill) of assets, including reservoirs, as well as direct impact of storm events and extreme temperatures. Severn Regulation reduces the risk of flow deficits to the Estuary and Bristol Water abstraction. • Would like to see more open inclusion of RSA/ AMP/ WINEP under the umbrella of WRW. Should waste water plans not be included at some point too? Feels a bit disconnected from the dirty water side. 	<p>Comments noted.</p> <p>Where relevant, WRW and individual core member water companies will take such additional issues into account when developing their plans.</p>

Table B.4 Responses to Natural Resources Wales comments on the SEA Scoping Report

Consultation Question	Section	Consultee Response	Response/Action
N/A	N/A	<p>We welcome and support the development of your regional water resources plan and the individual Water Resource Management Plans, together with your commitment to SEA.</p> <p>We welcome the inclusion of the considerations and products of the Environment (Wales) Act 2016 and the Wellbeing of Future Generations (Wales) Act 2015 within your reports.</p>	Comment noted.
	N/A	<p>Whilst these considerations and the Welsh aspects of baseline assessment are more comprehensively included within Appendix A (Dŵr Cymru Welsh Water DCWW scoping), we feel that there are elements relating to Welsh data and legislation that should be strengthened within the other documents. A consistent baseline of evidence for Wales should be used across all plans considering these areas. As it stands the information presented in Appendix B and D does not provide meaningful context for strategic decision-making in Wales.</p>	<p>Comment noted.</p> <p>This will be considered at the Environmental Report stage to ensure a consistent baseline across these water companies.</p> <p>This is reflected in Section 3 and Appendix D of this Environmental Report.</p>
<p>Q1. Do you think that the Scoping Report sets out sufficient information to provide the context for the SEAs of the draft WRW Regional Plan and WRMP24s in terms of an overview of each plan, the review of relevant plans and programmes and baseline evidence and analysis? If not, what additional information should be included?</p>		<p>We welcome the comprehensive review of plans and programmes. We note some missing items and amendments below for further consideration. We recognise that the scope of this document lists the preferred water resource options and Strategic Resource Options (SRO) as separate items. We believe clarification is required as to where the SEA of the SROs will sit if not within the WRMP of the individual water companies.</p> <p><u>Biodiversity, flora and fauna</u> When assessing the baseline evidence you should consider all of the elements of ecosystem resilience as set out in the Environment (Wales) Act 2016, taking account of the diversity between and within ecosystems, the connections between and within ecosystems, the scale of ecosystems, the condition of ecosystems (including their structure and functioning) and the adaptability of ecosystems. This should be included across all of the reports for areas within or affecting Wales.</p>	<p>Comment noted.</p> <p>The SRO options are being considered and assessed through the integrated options development programme and will be included in the will be included in the relevant WRMP and in the WRW Regional Plan.</p> <p>The SROs were identified as separate items covered by the scope of the assessment in S1.4 of the Scoping Report as we are aware that regulators have a substantial interest in these options, which are also being considered through the gated stages required by RAPID.</p> <p>Comment noted</p> <p>Ecosystem resilience will be considered where relevant to the WRW Regional Plan and WRMP24 and in line with the developed SEA assessment methodology; particularly the SEA objectives under the Biodiversity, Flora and Fauna Topic: SEA Objective 1. To protect and enhance biodiversity, including designated sites of nature conservation interest and protected habitats and species, enhance ecosystem resilience and habitat connectivity and deliver a net biodiversity gain; and SEA Objective 2. To protect and enhance sustainable natural resources and the ecosystem services they provide.</p>

Consultation Question	Section	Consultee Response	Response/Action
			<p>The Environment (Wales) Act 2016 requirements of Sustainable Management of Natural Resources are reflected in the WRW detailed screening criteria, applied to WRMP revised feasible options. They will also be addressed through the non-monetised elements of ecosystem resilience and enhancement opportunities evaluated as part of the Natural Capital Assessment (NCA) undertaken of the revised feasible options within each WRMP.</p>
		<p><u>Biodiversity, flora and fauna</u> It is also worth including non-statutory designations or information relating to biodiversity beyond Local Nature Reserves, such as Sites of Importance for Nature Conservation or other local information from Wildlife Trusts, Local Authorities or other conservation charities to help make an assessment of the ecological networks.</p>	<p>Comment noted.</p> <p>Regard will be given to non-statutory designations as per the objectives and guide questions of the SEA assessment methodology.</p>
		<p><u>Biodiversity, flora and fauna</u> We welcome the inclusion of Section 7 species and Invasive and Non-Native Species (INNS). There is however no indication of their baseline or trends and as such it is then difficult to make an assessment of change in the future.</p>	<p>Comment noted.</p> <p>The baseline data for these species are not readily included in reports at a strategic level.</p>
		<p><u>Biodiversity, flora and fauna</u> The Biodiversity and Water sections would be greatly improved with more information included to on freshwater habitats and species as these are those which are likely to be impacted, and the issues facing them such as water quality, flow and physical modifications. This would include reference to areas which are already impacted by water resource activities.</p>	<p>Comment noted.</p> <p>These issues will be considered in the HRA where European sites are designated for migratory species and to a certain extent in the WFD report. Where relevant it may also be included in the appropriate Environmental Report (to accompany either the WRW Regional Plan or WRMP24).</p>
		<p><u>Geology, land use and soils</u> The reference given for the Agricultural Land Use data is for England only. Please include a reference for the Welsh data used, the most up-to-date being Predictive Agricultural Land Classification (ALC) Map 2.</p>	<p>Comment noted.</p> <p>Appendix A: Dŵr Cymru Welsh Water presents in Table A3.2 Agricultural Land Quality (as a percentage of land area) for each ALC category for Wales and England. Figure A3.11 Agricultural Land Classification presents ALC information for Wales. This will be updated with information from the Predictive Agricultural Land Classification (ALC) Map 2 (DataMapWales (2019)).</p> <p>This data has been utilised in the 'Geology, Land Use and Soils' section of Appendix D.</p>
		<p><u>Water</u> The reference given for the water availability mapping refers to an Environment Agency dataset. Refer to the NRW Abstraction Licensing Strategies published at Natural Resources Wales /</p>	<p>Comment noted.</p>

Consultation Question	Section	Consultee Response	Response/Action
		<p>Water available in our catchments. For updated national-scale water resource mapping please refer to: Lle - Water Resource Reliability Data (gov.wales) (http://lle.gov.wales/catalogue/item/WaterResourceReliabilityData) Lle - Water Resource Availability Data (gov.wales) (http://lle.gov.wales/catalogue/item/WaterResourceAvailabilityData)</p>	<p>This data appears to be publicly available via the Welsh data portal and will be used where applicable, included in updated baselines contained in relevant Environmental Reports.</p>
		<p><u>Water</u> UK CCRA2 is referenced in terms of projected water availability. Whilst UKCCRA3 is not yet publicly available the updated water availability research supporting this is https://www.ukclimaterisk.org/ccra-research/ . We recommend you use the most up-to-date information.</p>	<p>Comment noted. This will be updated as appropriate in the relevant Environmental Reports. This data has been utilised in the ‘<i>Climatic Factors</i>’ section of Appendix D.</p>
		<p><u>Water</u> Given the context of the plan(s) being assessed this section in all of the reports would benefit from further integrated with the biodiversity section, considering the full range of freshwater biodiversity and protected sites, including lakes and wetlands.</p>	<p>Comment noted. In undertaking the SEA assessments, regard is given to interrelationships across topics.</p>
		<p><u>Water</u> We note in Section 1.7.3 and 1.7.4 pg. 23 the water companies’ commitments to considering the requirements of the Water Framework Directive Regulations 2017 in the SEA is welcomed. It should be noted that this will be relevant to not just the water quality topic but to other topics as well, particularly in terms of water dependant protected areas.</p>	<p>Comment noted. The following stages of the SEA will continue to consider the inter-relationships across topics. The WFD Regulations 2017 mitigation measures will be considered during the Environmental Reporting stage.</p>
		<p><u>Water</u> No information is presented on fluvial geomorphology or river dynamics. We recommend that you consider this within your SEA.</p>	<p>Comment noted. Geomorphology is highlighted as a key issue in WRMP specific baselines e.g., Appendix A, where the “<i>the need to protect, maintain and enhance geomorphological functions and services</i>” is identified. Given its strategic nature and the geographic extent covered, further additional information on fluvial geomorphology will not be provided in the baseline. The following supplementary or amended guide questions will be included to permit consideration of geomorphology effects:</p> <ul style="list-style-type: none"> • <i>Will it alter geomorphological forms and processes which underpin physical habitat for aquatic ecosystems? Objective 1.</i>

Consultation Question	Section	Consultee Response	Response/Action
			<ul style="list-style-type: none"> 'Will it result in changes to river flows, <u>channel morphologies</u>, wetted width or river levels?' Objective 5. <p>The WFD Assessment (Stage 3 Impact Assessment) also includes consideration of geomorphology through the source-pathway-receptor approach to identifying effects. Where relevant, such information will be used to inform the assessment of any options against the above guide questions.</p> <p>The supplementary guide question and revised guide question are reflected in Table 4.2 and Appendix E of this Environmental Report.</p>
		<p><u>Air quality</u> We welcome the inclusion of data linking air quality to public health. However, a lack of information presented linking air pollution to the impacts on ecosystems.</p>	<p>Comment noted.</p> <p>Table 3.1 of the Scoping Report identifies key pressures and risks in respect of biodiversity and nature conservation that are relevant as including atmospheric pollution (acid precipitation, nitrogen deposition). This also includes reference to increases in transport movements and works associated with the construction and operation of nationally significant water resources infrastructure could affect air quality and lead to increased nitrogen deposition in sensitive habitats.</p>
		<p><u>Population and human health</u> Whilst the DCWW report does use the 2019 Welsh Index of Multiple Deprivation (WIMD), the SVT report uses the 2015 version and the text of the UU report under deprivation makes no mention of Wales (nor are the Welsh areas under consideration mentioned within the rest of this section). Both SVT and UU should include Welsh data where relevant.</p>	<p>Comment noted.</p> <p>Data from the 2019 Welsh Index of Multiple Deprivation (WIMD) will be used, where relevant, within the Environmental Report.</p> <p>This data has been used in the 'Population and Human Health' section of the baseline, presented in Appendix D of this Environmental Report. Specifically, Figure D.12 presents both English IMD 2019 and Welsh IMD 2019 data.</p>
	Table 2.1/Appendix E	<p><u>Material assets and resource use</u></p> <ul style="list-style-type: none"> The review of National Plans & Programmes (Appendix E) should refer to UK Governments 2020 Energy white paper: Powering our net zero future as the latest expression of UK energy policy. There should be reference to UK Govts Offshore Energy Plan and Welsh Government's Marine Energy Programme (although worth checking with WG its exact status and timetable and intended outputs). Both include consideration of tidal range technologies 	<p>Comments noted.</p> <p>The following plans/programme will be added to the review of plans and programmes in the Environmental Report:</p> <ul style="list-style-type: none"> HM Government (2020) Energy White Paper: Powering our net zero future <p>The UK government issued a call for evidence on the scope for marine energy technologies, including floating offshore wind and wave and tidal energy. This fed into the energy white paper. The WG Marine Energy Programme for Wales is</p>

Consultation Question	Section	Consultee Response	Response/Action
		<ul style="list-style-type: none"> The National transport plan has been included however regional transport plans should also be included under local / regional plans. 	<p>included in the review of plans and programmes and provides planning policy for offshore and tidal energy.</p> <p>Regional transport plans will also be included in the review of plans and programmes included within the Environmental Report accompany the relevant plan. Information will be provided proportionate to that provided for other generic plan types such as Local Planning Authority Land Use Plans.</p> <p>The additional plans and programmes have been reflected Table 2.1/Appendix C of this Environmental Report. Comment noted.</p>
	Table 2.1/Appendix E	<p><u>Cultural heritage and landscape</u> Only Appendix A (DCWW) contains the Welsh landscape and cultural baseline evidence and analysis we would expect. LANDMAP, Designated Landscapes, Tranquillity, Historic Landscape, Heritage Coast and Landscape Character Areas are missing from UUW and Severn Trent reports. Analysis of the issues is therefore weak for Wales in these two reports and should be reviewed.</p> <p>The review of plans and programmes is comprehensive for landscape.</p>	<p>These issues will be included in the relevant Environmental Report.</p> <p>This has been reflected in the 'Landscape' section of Appendix D of this Environmental Report.</p>
<p>Q2. Do you agree that the main environmental issues identified are relevant to the SEAs of the draft of the draft WRW Regional Plan and WRMP24s? If not, which issues do you think need to be included or excluded?</p>		<p><u>Biodiversity, flora and fauna</u> When looking at the key issues you should consider all of the elements of ecosystem resilience as set out in the Environment (Wales) Act 2016, we welcome the inclusion of some of the elements here and the explicit references to ecosystem resilience with DCWW's report. However, this is an element which requires strengthening within the other water company reports (Appendix B And D). <u>Biodiversity, flora and fauna</u> Key issues for biodiversity should explicitly reference issues faced by freshwater habitats including flow regime and physical modifications. The effects on migratory species, including effects on migratory fish from barriers to migration, changes in flow and gravel movement should be considered as these are currently missing.</p>	<p>Comment noted.</p> <p>The elements of ecosystem resilience as set out in the Environment (Wales) Act 2016, will be considered in the baseline/key issues section for biodiversity within the relevant Environmental Report (to accompany the WRMP24s).</p> <p>These issues will be considered in the HRA where European sites are designated for migratory species and to a certain extent in the WFD report. Where relevant it may also be included in the appropriate Environmental Report (to accompany either the WRW Regional Plan or WRMP24).</p>
	Section 3.2/Table 3.1	<p><u>Geology, land use and soils</u> Minimising loss of best and most versatile agricultural land has been included. We believe that you also need to consider the wider impacts on other land-uses (such as forestry operations).</p>	<p>Comment noted.</p> <p>An additional guide question will be added against the SEA Objective 4 for the 'Soils, Land Use and Geology' topic: <i>Will it avoid adverse effects on other land uses (such as forestry)?</i></p>

Consultation Question	Section	Consultee Response	Response/Action
			<p>In this way, where appropriate, wider impacts on other land-uses will be considered in the relevant Environmental Report.</p> <p>The supplementary guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p>
	Section 3.2/Table 3.1	<p><u>Water</u> Requires strengthened links to freshwater habitats – as per previous comments.</p>	<p>Comments noted.</p> <p>Where relevant, revised information may be included in the appropriate Environmental Report. These issues will be considered in the HRA where European sites are designated for migratory species and to a certain extent in the WFD report.</p>
		<p><u>Water</u> We would recommend that you consider any potential changes to ‘fluvial geomorphology’ (for example sediment loading) from your WRMP options and therefore any potential impacts to WFD status or impacts to freshwater ecology.</p>	<p>Comments noted.</p> <p>Geomorphology is highlighted as a key issue in WRMP specific baselines e.g., Appendix A, where the “<i>the need to protect, maintain and enhance geomorphological functions and services</i>” is identified. Given its strategic nature and the geographic extent covered, further additional information on fluvial geomorphology will not be provided in the baseline.</p> <p>The following supplementary or amended guide questions will be included to permit consideration of geomorphology effects:</p> <ul style="list-style-type: none"> • <i>Will it alter geomorphological forms and processes which underpin physical habitat for aquatic ecosystems? Objective 1.</i> • <i>‘Will it result in changes to river flows, <u>channel morphologies</u>, wetted width or river levels?’ Objective 5.</i> <p>The WFD Assessment (Stage 3 Impact Assessment) also includes consideration of geomorphology through the source-pathway-receptor approach to identifying effects. Where relevant, such information will be used to inform the assessment of any options against the above guide questions.</p> <p>The supplementary guide question and revised guide question are reflected in Table 4.2 and Appendix E of this Environmental Report.</p>
		<p><u>Water</u> We would recommend that you also refer to consideration of the implementation of WFD Regulations 2017 mitigation measures as many of the existing reservoirs and abstractions still have mitigation measures that need to be put in place.</p>	<p>Comments noted.</p> <p>These issues will be considered in the WFD report. Where relevant it may also be included in the appropriate Environmental Report (to accompany either the WRW Regional Plan or WRMP24).</p>

Consultation Question	Section	Consultee Response	Response/Action
	Table 3.1	<p><u>Air quality</u> Recommend a wording change from 'minimise emissions' to 'ensure that people and sensitive habitats are protected from emissions by enhancing air quality'.</p>	<p>Comment noted.</p> <p>It is considered that the existing wording (<i>The need to minimise emissions of pollutant gases and particulates and enhance air quality arising from the implementation of the WRMPs and WRW Regional Plan.</i>) is sufficiently broad, such that it already captures the need to enhance air quality to protect people and sensitive habitats and goes further by saying that emissions should be also be minimised.</p>
	Table 3.1	<p><u>Climatic factors</u> The climate change section of Table 3.1 refers to coastal change and cross references to the water -flood risk section. Whilst vulnerability to flooding and coastal change is recognised, the relevant key issue highlighted relates to resilience only. It is recommended that adaptation is also considered for coastal assets which are at flooding or erosion risk.</p>	<p>No change. Comment noted.</p> <p>Table 3.1 includes the need to take into account, and where possible adapt to, the potential effects of climate change. Flood risk is also identified as a separate issue. Taking into account the nature and scope of the plans being assessed and the information already provided, the additional information suggested regarding coastal assets and erosion are considered to be appropriately covered within the assessment.</p>
	Table 3.1	<p><u>Landscape</u> Suggest adding Protect against wildfires (due to extreme weather events linked to climate change) as key issues throughout the reports.</p>	<p>Comment noted. '</p> <p>Taking into account the nature and scope of the plans being assessed and the information already provided, the additional information suggested is considered outside of scope for the assessment.</p>
<p>Q3. Do you agree with the proposed approach to the SEAs of the draft WRW Regional Plan and WRMP24s? Are the proposed SEA objectives, guide questions and significance thresholds appropriate for the scope of each plan assessment? If not, which objectives/guide questions should be amended and which other objectives/guide questions do you believe should be included?</p>		<p>We welcome that a 'high-level' analysis of the impact that the draft WRW Regional Plan and WRMPs will have on the achievement of the seven well-being goals for Wales and that the objective for the 'Sustainable Management of Natural Resources' will be undertaken. The Sustainable Development principle and the SMNR principles should be built into your SEA process (in addition to the WRMP process) to ensure that these are fully embedded, and you are maximising your contributions to the well-being of Wales, as per the WRMP guidance. Please see our comments on HRA process with regards to boundaries for assessing impacts. Where specific quantified thresholds are given to determine impact, these should be considered in relation to the local context.</p>	<p>Comment noted.</p> <p>The high-level analysis of the impact that the draft WRW Regional Plan and WRMPs on the seven well-being goals for Wales and the objective for the SMNR will build on that completed for the relevant WRMP19s (informed by any available guidance from Welsh Government or the Future Generations Commissioner for Wales. It will be undertaken following mapping of the 17 SEA objectives against the seven well-being goals.</p> <p>WRW is taking an integrated approach to preparing the Regional Plan and the WRMP24s. WRW member water companies are using a regionally consistent set of methodologies to reflect local, regional and national needs into the development of the plans. The definitions of significance have been developed so that they can apply to the SEA of each of the plans, whether that be the WRW Regional Plan or the</p>

Consultation Question	Section	Consultee Response	Response/Action
			<p>individual WRMPs to ensure a consistent approach to interpreting the significance of effects.</p> <p>The mapping of the 17 SEA Objectives against the seven well-being goals and the analysis of the impact that the revised draft WRMP24 has on the seven well-being goals and objective for SMNR is presented in section 6.8 ('<i>Contribution of the Draft WRMP to Wales' Well-being Goals and the Objective for SMNR</i>') of this Environmental Report.</p>
	Table 4.2/Appendix F	<p><u>Biodiversity, flora and fauna</u></p> <ul style="list-style-type: none"> We believe that objective 1 and guide question should be amended to "Protect, restore and enhance". This would reflect the current need to work towards restoring many of our protected sites to favourable condition. There is a long legacy of damage to our protected sites and it takes time and considerable resources to tackle many of the complex issues. Include minimise the "risk" of spread of Invasive and Non-Native Species. 	<p>Agreed.</p> <p>The wording of Objective 1 (Biodiversity) and Objective 3 (INNS) and corresponding guide questions will be revised to reflect these comments.</p> <p>The revised wording for Objective 1 and corresponding guide questions is reflected in Table 4.2, Table 4.5, Table NTS.2 and Appendix E of this Environmental Report.</p> <p>The revised wording for Objective 3 and corresponding guide question is reflected in Table 4.2, Table NTS.2 and Appendix E of this Environmental Report.</p>
		<p><u>Geology, land use and soils</u></p> <ul style="list-style-type: none"> You will need to consider all types of relevant land use (such as different types of agriculture, horticulture, forestry) within the local area and will need to consider what is important in the context. Currently these considerations are missing from SEA scoping document. 	<p>Comment noted.</p> <p>An additional guide question will be added against the SEA Objective 4 for the 'Soils, Land Use and Geology' topic:</p> <p><i>Will it avoid adverse effects on other land uses (such as forestry)?</i></p> <p>In this way, where appropriate, wider impacts on other land-uses will considered in the relevant Environmental Report.</p> <p>The supplementary guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p>
	Table 4.2/Appendix F	<p><u>Water</u></p> <ul style="list-style-type: none"> There needs to be greater integration and consideration of how the guide questions and objectives work together for example in the Water topic, when referring to sustainable use of water. The use of water is not just for people as its vital to sustain biodiversity in the face of climate change. The Water quantity and quality topics should link the other topic objectives, such as Biodiversity and Climatic factors topics. These topics would benefit from 	<p>Comments noted.</p> <p>Schedule 2 (6) of the SEA Regulations requires the assessment and reporting of the likely significant effects on the following topics: "biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; <u>and the inter-relationship between the issues.</u>" This will be undertaken through the assessment of cumulative</p>

Consultation Question	Section	Consultee Response	Response/Action
		<p>having guide questions that relate to the sustainable use of water and SMNR principles.</p> <ul style="list-style-type: none"> Linked to comment on objective 1 above – you should consider whether the Regional Plans/WRMP options will contribute to restoration of species that are currently not achieving management objectives, including due to flow regime or physical modifications. Water quantity should also include the guide questions “Will it support the achievement of WFD protected area objectives?” and “Will it prevent the deterioration of Water Framework Directive (WFD) waterbody status (or potential)?” as listed in the Water quality topic, can these be added as guide questions? These questions would benefit from the inclusion of lakes and wetlands. Flooding should also be considered as a key ecosystem function of rivers. 	<p>effects of individual options which will also be informed by the findings of the HRA, WFD assessment and NCA.</p> <p>The wording of Objective 1 (Biodiversity) and corresponding guide questions will be revised to include ‘restoration’, to ensure, where relevant effects are identified, described and assessed. These issues will be considered in the HRA and the WFD report.</p> <p>Contribution to the achievement of WFD objectives is already specifically reflected in the guide questions for Objective 6 (Water Quality).</p> <p>The guide questions for Objectives 5 (Water Quantity) and 6 (Water Quality) include reference to surface waters and water bodies, and to avoid unintended duplication, reference to ‘lakes and wetlands’ will not be included.</p> <p>Comment noted.</p> <p>The revised wording for Objective 1 and corresponding guide questions is reflected in Table 4.2, Table 4.5, Table NTS.2 and Appendix E of this Environmental Report.</p>
	Table 4.2/Appendix F	<p><u>Air quality</u></p> <ul style="list-style-type: none"> Please see comments from question 2 on air quality for suggested amendment. 	Comment noted.
	Table 4.2/Appendix F	<p><u>Climatic factors</u></p> <ul style="list-style-type: none"> The guide question “Will the option increase environmental resilience to the effects of climate change?” could be expanded to identify impacts on flood risk/water quality. 	<p>Comment noted.</p> <p>This guide question already includes reference to impacts on flood risk and water quality.</p>
	Table 4.2/Appendix F	<p><u>Population and human health</u></p> <ul style="list-style-type: none"> Within the guide questions and thresholds further integration of the wellbeing goals should be considered to maximise the wellbeing benefits provided of any option, including enjoyment of green and blue space providing both mental and physical 	<p>No change.</p> <p>Comment noted.</p> <p>SEA Objective 12 includes the following guide question “<i>Will it protect and enhance public access to, and enjoyment of, green and blue infrastructure, open space/recreational facilities and the natural and historic environment, and in doing so help promote healthy lifestyles including mental well-being?</i>” which</p>

Consultation Question	Section	Consultee Response	Response/Action
		wellbeing benefits, social wellbeing factors and economic wellbeing.	along with SEA Objectives 1 (Biodiversity), 2 (Sustainable Natural Resources), 10 (Resilience), 11 (Economic and social well-being), 13 (Human health) and 16 (Cultural heritage) provide a broad framework to consider the effects on the well-being goals. Further review of the updated SEA framework following scoping consultation will be undertaken to ensure any opportunities to strengthen the assessment are identified and incorporated. See Table 4.2 of this Environmental Report.
	Table 4.2/Appendix F	<p><u>Landscape</u></p> <ul style="list-style-type: none"> We would recommend an addition to one of the proposed guide questions on landscapes (which includes Designated Landscapes). Therefore, we suggest the addition of 'and the settings of Designated Landscapes'. 	<p>Agreed. The wording of the first guide question under Objective 17 (Landscape) has been amended to read:</p> <p><i>Will it avoid adverse effects to, and enhance where possible, protected/designated landscapes <u>and the settings of designated landscapes</u> (including woodlands) such as National Parks or AONBs?</i></p> <p>The revised wording for this guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p>

Table B.5 Responses to Natural England comments on the SEA Scoping Report

Consultation Question	Section	Consultee Response	Response/Action
N/A	N/A	There is much in the Strategic Environmental Assessment (SEA) scoping report that is good and Natural England welcomes WRW's commitment to environmental assessment.	Comment noted.
Q1. Do you think that the Scoping Report sets out sufficient information to provide the context for the SEAs of the draft WRW Regional Plan and WRMP24s in terms of an overview of each plan, the review of relevant plans and programmes and baseline evidence and analysis? If not, what additional information should be included?	Section 2, Table 2.1, Appendix E	<p>Natural England applauds the very thorough consideration of plans and programmes that underpin it's plan. Some additional plans that may be relevant:</p> <p>The Environment Bill 2020, although not yet finally published, should be as this includes long term targets set by the government relating the natural environment – and may be especially relevant to the environmental destination.</p> <p>The Land Drainage Act 1991 – ground water levels.</p> <p>The Conservation of Habitats and Species Regulations 2017 – current transposed directive in the UK of The Habitats Directive 1992.</p> <p>The Conservation (Natural Habitats, &c.) Regulations 1994 – imposed a duty on the IDB to develop WLMP for SSSI sites.</p> <p>The Nitrate Pollution Prevention Regulations 2015</p> <p>Agriculture Act 2020 – changes to farm subsidies could have a significant impact on the farming industry & thus water usage.</p>	<p>Comment noted.</p> <p>The following additional plans and programmes will be included in the Environmental Report:</p> <ul style="list-style-type: none"> • The Land Drainage Act 1991 • The Conservation (Natural Habitats, &c.) Regulations 1994 • The Nitrate Pollution Prevention Regulations 2015 • The Agriculture Act 2020 <p>The Conservation of Habitats and Species Regulations 2017 is already included in the review of plans and programmes and also considered within section 1.6 of the Scoping Report. These 2017 regulations consolidate all the various amendments made to the Conservation (Natural Habitats) Regulations 1994. It is noted that changes to the 2017 Regulations came into force in January 2021, as a result of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, reflecting the UK's exit from the EU. These changes will be reflected within the review of plans and programmes in the Environmental Report.</p> <p>To avoid undue reliance on draft versions of plans and programmes that could be subject to change, consultation documents and draft legislation are not included in the plans and programmes reviewed, unless highly relevant e.g., the Water Resources Planning Guidelines.</p> <p>The changes and additions to the review of plans and programmes have been reflected Table 2.1/Appendix C of this Environmental Report.</p>
		We would like to see the key objectives for the Governments 25Year Plan to Improve the Environment highlighted more prominently, including the objectives for protected sites and the governments commitment to protect 30% of land by 2030.	<p>Comment noted.</p> <p>The Government's 25 Year Environment Plan: 'A Green Future: Our 25 Year Plan to Improve the Environment', is one of over 200 international/European, national, regional/sub-regional and local level plans were reviewed during the preparation of the Scoping Report. It has been reviewed and summarised (in Appendix E). Each has a claim of importance and relevance.</p>

Consultation Question	Section	Consultee Response	Response/Action
			Key policy objectives have been summarised in Table 2.2 with the 25 Year Plan identified.
Q2. Do you agree that the main environmental issues identified are relevant to the SEAs of the draft of the draft WRW Regional Plan and WRMP24s? If not, which issues do you think need to be included or excluded?	Table 3.1	Table 3.1 sets out the key issues relating to Biodiversity Flora and Fauna. Natural England would like to see added to the list depletion and pollution of groundwater as we feel this has significantly impacted a large number of protected sites.	<p>Comment noted.</p> <p>'Depletion and pollution of groundwater' is considered to be addressed in the revised key issues included under the water quality topic 'The need to maintain the quantity and quality of groundwater resources taking into account WFD objectives' which in summary contains aspects of both groundwater quantity and quality.</p>
	Table 3.1	Table 3.1 – section 5. Flood Risk – natural flood management (NFM) tools area key tool for improving the water resource infrastructure.	Comment noted.
	Table 3.1	Table 3.1 – section 5. Flood Risk – key issues include the lack of connectivity of our rivers to their floodplains, the channelisation and dredging of rivers, the historic conversion of rivers into drains, and historic land drainage acts.	<p>Comment noted.</p> <p>The key issues summarised in Table 3.1 relate to the scope of the WRMPs and the assessment. The issues highlighted in the response will where appropriate be added to those taken forward for consideration within the SEA and subsequently presented in the relevant Environmental Report, accompany each plan.</p>
	N/A	<p>We would also like to see specifically referenced the requirement to increase landscape resilience and ensure that our future dependence on the natural environment relies on us using it more sustainably. We would also highlight that many of the solutions that are required to reverse biodiversity loss and restore protected sites and meet other objectives are entirely compatible with other key strategies that could be seen as competing, such as the need to protect drinking supplies and prevent flooding. Nature Based Solutions work synergistically and can offer significant cost-benefit compared to more traditional approaches.</p>	<p>Comments noted.</p> <p>SEA Objective 1 'To protect and enhance biodiversity, including designated sites of nature conservation interest and protected habitats and species, enhance ecosystem resilience and habitat connectivity and deliver a net biodiversity gain' and SEA Objective 2 'To protect and enhance sustainable natural resources and the ecosystem services they provide' explicitly seeks to address many of the wide-ranging issues highlighted.</p> <p>WRW and its core members are seeking to develop an ambitious long-term, multi-sector adaptive water resources plan. This includes taking into account wider societal needs including flood risk considerations, environmental improvement and cross-sector working, where innovative approaches such as NBS could afford benefits.</p>
	N/A	Reference should be made to opportunities to use nature based solution to deliver multiple benefits such as carbon sequestration, biodiversity, nutrient capture, urban cooling, flood risk mitigation in addition to improved infiltration and storage of water for resources.	Comment noted.

Consultation Question	Section	Consultee Response	Response/Action
	N/A	One issue common to all SEAs is that separating the impacts into separate topics makes it more difficult to identify the synergistic impacts of schemes but also the multiple benefits from nature-based solutions.	<p>Comment noted.</p> <p>Schedule 2 (6) of the SEA Regulations requires the assessment and reporting of the likely significant effects on the following topics: “biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; <u>and the inter-relationship between the issues.</u>” This will be undertaken through the assessment of cumulative effects of individual options which will also be informed by the findings of the HRA, WFD assessment and NCA.</p> <p>Secondary, cumulative and synergistic effects of individual options, programmes of options within each of the WRZs in deficit, the WRW Regional Plan and WRMPs as a whole and the WRW Regional Plan and WRMPs in combination with other plans and programmes will be assessed as part of the SEA.</p> <p>The assessment of the cumulative effects of the preferred options is presented in section 6.3, whilst the secondary, cumulative and synergistic effects of the revised draft WRMP24 in combination with other plans, programmes and infrastructure projects is presented in section 6.7 of this Environmental Report.</p>
<p>Q3. Do you agree with the proposed approach to the SEAs of the draft WRW Regional Plan and WRMP24s? Are the proposed SEA objectives, guide questions and significance thresholds appropriate for the scope of each plan assessment? If not, which objectives/guide questions should be amended and which other objectives/guide questions do you believe should be included?</p>	Table 4.2/Appendix F	<p>Table 4.2 – Topic. Biodiversity, Flora and Fauna – bullet point 10 references as an example climate change adaptability. Suggest having a specific question referring to the impacts of climate change on protected / non protected sites / species e.g. – Will it provide opportunities for climate adaptation and protect the climate resilience of vulnerable and priority sites?</p>	<p>Comment noted.</p> <p>The following guide question will be added under Objective 2 of the assessment framework:</p> <p><i>Will it provide opportunities for climate adaptation and protect the climate resilience of vulnerable and priority sites?</i></p> <p>The supplementary guide question is reflected in Table 4.2 and Appendix E of this Environmental Report.</p>
	?	<p>Table 4.1 – Topic. Water Quality - Highlight the issues of emerging substances (PCPs) & plastic pollution & knowledge gaps within this area.</p>	<p>Comment noted.</p> <p>Issues relating to water quality, in terms of emerging substances (PCPs) and plastic pollution, and knowledge gaps within this area will be highlighted within the Environmental Report, where relevant.</p>
	Appendix F	<p>Few semi-quantitative or quantitative metrics within the assessment to support guide questions. Do we</p>	<p>Comment noted.</p>

Consultation Question	Section	Consultee Response	Response/Action
		<p>think going forward that some less subjective 'measures' need to be included? How are we going to balance things against environmental impacts without quantifiable measures? UKWIR 2020 guidance suggests a mix of qualitative, semi-qualitative and quantitative measure might be used.</p>	<p>The 'Definitions and Thresholds of Significance' set out in Appendix F of the scoping report, are considered to provide a balance of both quantitative and qualitative measures (as per UKWIR Guidance) which help to ensure a consistent approach to interpreting the significance of effects and helps the reader understand the decisions made by the assessor.</p> <p>The proposed thresholds include reference to yield (MI/d), design capacity (MI/d), capex (£m), embodied and operational carbon (tCO2e), flood risk (% site in FZ3), air quality (AQMAS) and water quality (WFD status). Additional quantitative measures for air quality and Material Assets – Waste and Resource Use have also now been added to ensure consistency between assessments.</p> <p>These will be set out in the relevant Environmental Reports.</p> <p>These additional quantitative measures are reflected in Appendix E of this Environmental Report.</p>

Table B.6 Responses to Environment Agency comments on the SEA Environmental Report

Consultation Question	Section	Consultee Response	Response/Action
N/A	N/A	<p>Additionally, the current environmental assessments accompanying the plan are inadequate and further work is required. It is critical that all feasible and alternative options have been assessed appropriately, with consideration of transboundary impacts and this should help underpin decisions around options selected in the best value plan.</p>	<p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended to reflect the changes in the revised preferred options and reasonable alternatives to the plan, consistent with the requirements of SEA Regulation 12 (2), government and sector guidance and case law. This necessitates that alternatives to the plan must meet the plan objectives (consistent with the WRPG requirement that the plan must achieve best value). Reasonable alternatives to the plan have then been identified, described and evaluated consistent with this requirement.</p> <p>The effects of all revised feasible options have been identified, described and assessed, and are presented in Section 5 and individually in Appendix F.</p> <p>SEA findings from the revised feasible option assessment have also been used in the completion of the detailed screening of the revised feasible options and as inputs into the MCDA ('ValueStream') for option appraisal and plan selection. This is presented in the WRW Decision metrics supplementary note v1.0 (16.06.2020)) and the WRW Regional Plan Decision Tool Workshop Report (August 2021). The use of the SEA findings within UUV's WRMP24 option appraisal and decision making is outlined in Section 5.5 of this Environmental Report.</p> <p>Section 6.3 and 6.7 of the dWRMP SEA Environmental Report details cumulative effects, including consideration of transboundary issues. These have been revised as necessary to reflect the revised preferred option suite.</p>
N/A	N/A	<p>Recommendation 9: Revise the strategic environmental assessment (SEA) so that it is clear how the options compare to least cost, best value and best for society and the environment plans. The company should also address other shortcomings in its SEA, including identifying transboundary effects and showing how in-combination and cumulative effects have been considered within the SEA.</p>	<p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended to reflect the changes in the revised preferred options and reasonable alternatives to the plan, consistent with the requirements of SEA Regulation 12 (2), government and sector guidance and case law. This necessitates that alternatives to the plan must meet the plan objectives (consistent with the WRPG requirement that the plan must achieve best value). Reasonable alternatives to the plan, have then been identified, described and evaluated consistent with this requirement.</p> <p>SEA findings from the revised feasible option assessment have also been used in the completion of the detailed screening of the revised feasible options and as inputs into the into the MCDA ('ValueStream') for option appraisal and plan selection. This is presented in the WRW Decision metrics supplementary note v1.0</p>

Consultation Question	Section	Consultee Response	Response/Action
N/A	Section 4	<p>Issue 9.1: Reasonable plan alternatives</p> <p>It has been identified in Section 4 of the SEA, that the revised feasible options are considered as reasonable alternatives to the preferred options. When assessed for reasonable plan alternatives, the reasonable alternative options have been compared to the preferred options rather than collectively compared as different alternative plans for example comparing the least cost plan with the best value plan.</p> <p>The lack of reasonable alternative plan assessments reduces the effectiveness of the plan and has the potential to overlook significant effects of the options such as transboundary effects. This approach is not compliant with the SEA Regulations and poses a risk to legal challenge.</p> <p>The reasonable alternative options need to be re-assessed as reasonable alternative plans, to include a least cost, best value and best for society and environment plan.</p> <p>The company should improve the clarity in the SEA that the revised feasible options are considered the reasonable alternatives.</p>	<p>(16.06.2020)) and the WRW Regional Plan Decision Tool Workshop Report (August 2021).</p> <p>Section 6.3 and 6.7 of the dWRMP SEA Environmental Report details cumulative effects, including consideration of transboundary issues. These have been revised as necessary to reflect the revised preferred option suite.</p> <p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended to reflect the changes in the revised preferred options and reasonable alternatives to the plan, consistent with the requirements of SEA Regulation 12 (2), government and sector guidance and case law. This necessitates that alternatives to the plan must meet the plan objectives (consistent with the WRPG requirement that the plan must achieve best value). Reasonable alternatives to the plan, have then been identified, described and evaluated consistent with this requirement.</p> <p>Each revised feasible option was subject to SEA. The SEA findings from each revised feasible option assessment were then used in UU's option appraisal process:</p> <ul style="list-style-type: none"> - as part of the detailed screening of the revised feasible options to determine the constrained options (by informing the assessment against the criterion 'Does the option meet the social and environmental objectives of the relevant SEA?') - by conversion into values for input into the MCDA ('ValueStream') for assessment of four of the eight decision making metrics. This is presented in the WRW Decision metrics supplementary note v1.0 (16.06.2020)) and the WRW Regional Plan Decision Tool Workshop Report (August 2021). <p>In consequence, and with reference to reasonable alternatives, each revised feasible option is considered as a reasonable alternative, when selecting the constrained and preferred options. For the avoidance of doubt, an individual feasible option is not considered a reasonable alternative to the plan.</p> <p>The assessment of the revised feasible options is presented in section 5 of this Environmental Report (individual option assessment matrices are presented in Appendix F), whilst the assessment of the revised preferred options is presented in section 6.2, the preferred programme assessment is presented in section 6.3 and the assessment of the reasonable alternative plan</p>

Consultation Question	Section	Consultee Response	Response/Action
N/A	Section 4.4 (Paragraph 4.4.4)	<p>Issue 9.2: Revised feasible options - characteristics and significant effects</p> <p>The characteristics of effects have been outlined within the methodology section of the SEA in Section 4.4.4, despite this the characteristics have not been considered through the assessment. For some objectives there is no acknowledgement of the duration, magnitude, or geographic scale within the assessment. The geographic scale is pertinent as it can identify transboundary effects which currently haven't been considered, resulting in some significant effects being missed.</p> <p>The omission of transboundary effects poses a significant risk and could result in unidentified significant effects which have not been reviewed within the SEA.</p> <p>Further information on the characteristic of effects should be included within the SEA. Further clarity should be provided within the SEA to demonstrate no significant cross-boundary conflicts or issues that could significantly affect the approval and adoption of the WRMP.</p>	<p>is presented in section 6.4 (individual preferred plan option/reasonable alternative plan option assessments are presented in appendix G).</p> <p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended to reflect the changes in the revised preferred options that have been selected and for those options, where appropriate, reference has been made to the characteristics of effects (such as timing and location) and transboundary effects.</p>
N/A	Section 1.1	<p>Issue 9.3: Inconsistent objectives between the draft WRMP and the SEA</p> <p>Information on the needs and contents in the company plan is provided in the SEA but the objectives listed under Section 1.1 of the Main report have not been included within the SEA. Schedule 1 (Article 1) of the SEA Regulations requires an environmental report to provide an outline of the contents and main objectives of the plan being assessed.</p> <p>There is a risk of legislative non-compliance and poses a risk to customer understanding.</p> <p>The company should include the objectives listed under Section 1.1 of the Main report within the SEA report to meet legislative requirements.</p>	<p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended to include the revised draft WRMP24 objectives.</p> <p>This is reflected in section 1.3 of this Environmental Report.</p>
N/A	Section 2 (Table 2.2); Appendix C	<p>Issue 9.4: Plan, Policy, and Programme (PPP) review</p> <p>There is a lack in clarity of how the policy objectives and messages included in Table 2.2 in the SEA have influenced the development of the objectives and focus of the SEA.</p> <p>Appendix C details the relationships and influences of the plans and programmes of the SEA. However, 'should' is referred to frequently and it is unclear whether the plans and policies listed have been considered in the SEA.</p>	<p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended. Table 2.1 lists all the plans, programmes and strategies that have been considered within the SEA (with each plan and programme reviewed and included in Appendix C). Supplementary information has been included in Table 2.2 of the updated Environmental Report linking the key policy objectives and messages explicitly to the relevant SEA objectives and guide questions.</p>

Consultation Question	Section	Consultee Response	Response/Action
		<p>There is a potential risk of the SEA objectives not addressing key themes identified in the PPP review, which may have an impact on water security and fail to protect the environment. The adoption of the plan is also vulnerable to legal challenge, as the SEA Regulations require Environmental Reports to identify and explain the relationship with other PPPs.</p> <p>The company should:</p> <ul style="list-style-type: none"> • update Table 2.2 or text supporting Table 2.2 to clearly explain how policy objectives and messages have influenced the development of the objectives and focus of the SEA report <p>provide a clear explanation on which plans, and programmes have been considered within the SEA and the influence these plans and programmes have had on the SEA</p>	
<p>N/A</p>	<p>Section 6.5; Section 6.3 (Table 6.9)</p>	<p>Issue 9.5: In-combination and cumulative effects</p> <p>In-combination and cumulative effects have been assessed under Section 6.5 'Secondary, Cumulative and Synergistic Effects Assessment' of the SEA report. Although the assessment is extensive and provides a good amount of detail on the potential cumulative effects, it is unclear how the synergistic and secondary effects have been considered within the SEA. The potential cumulative effects included are also not linked back to the objectives of the SEA.</p> <p>The omission of synergistic and secondary effects within the SEA could risk some effects not being identified, posing a risk to the environment.</p> <p>There is also the potential for legal challenge to the adoption of the company's plan if it is found not to have identified all likely significant cumulative effects associated with the plans' implementation as is required by the SEA Regulation.</p> <p>The company should:</p> <ul style="list-style-type: none"> • review Section 6.5 to ensure that all synergistic, cumulative, and secondary effects have been correctly identified and are clearly explained <p>the potential cumulative effects included within Section 6.5 should be linked to the objectives of the SEA. The company should consider presenting this information in a table similar to Table 6.9 in Section 6.3 of the SEA</p>	<p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended. Section 6.7 of the SEA Environmental Report has been reviewed to ensure appropriate identification, description and assessment of likely significant cumulative, secondary and synergistic effects. A summary RAG assessment has also been provided to supplement the detailed analysis with a high-level overview of the likely significant effects using the framework of the SEA objectives.</p>

Consultation Question	Section	Consultee Response	Response/Action
N/A	Section 7.4 (Paragraph 7.4.3)	<p>Issue 9.6: Reporting on monitoring</p> <p>The indicative monitoring proposals appear to be appropriate, however it is unclear how monitoring would be reporting on. In Section 7.4.3 of the SEA the company states that they expect to monitor the effects of the WRMP24 alongside the other impacts of its operations. However, due to differences in timescales between operations it is unknown when the reporting would occur.</p> <p>The lack of clarity for how monitoring both the SEA and WRMP would be reported on, poses a risk to the environment.</p> <p>The company should provide a clear outline of the reporting timescales involved with the monitoring required in both the SEA and the WRMP.</p>	<p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended. Table 7.1 which outlines the potential indicators to monitor effects has been supplemented. Note that this list is provisional; monitoring proposals will be considered further and a final monitoring framework that satisfies the requirements of the SEA Regulation will be presented in the Post Adoption Statement.</p>
N/A	Appendix B (Tables B.1 – B.4)	<p>Issue 9.7: SEA Scoping Report</p> <p>Tables B.1 to B.4 within Appendix B of the SEA detail the consultation responses on the SEA Scoping Report, and how the company has addressed the comments within the SEA. The responses are thorough and address all the points covered in the comments, however, the company has stated for some comments that their action or response will be included in the SEA. It is unclear where these actions and responses have been included within the SEA, the tables should signpost to the location of the actions and responses as described.</p> <p>The lack of clarity on where statutory consultee comments have been addressed within the report, reduces the confidence that the comments received have been adequately addressed.</p> <p>The 'Summary of Responses' Tables in Appendix B of the SEA should be updated to signpost to where comments received from the statutory consultees have been addressed, to ensure all comments have been adequately addressed.</p>	<p>The SEA Environmental Report of United Utilities revised draft WRMP24 has been amended. Appendix B of the SEA which contains the 'Summary of Responses' Tables has been updated to signpost to where comments received from the statutory consultees have been addressed.</p>
N/A	Appendix D	<p>Issue 2.2: Determine changes to abstractions to protect or improve locally important sites</p> <p>The SEA includes a section on non-statutory protected sites and other biodiversity on page 435, where the number of protected sites and species are listed. However, there is insufficient information given about whether the company has considered if any changes are required to protect or improve these sites or species.</p> <p>The lack of information on the changes required to protect or improve locally important sites, makes it unclear how the plan might affect locally important sites.</p> <p>The company should provide a clear assessment to determine if any changes are needed to abstractions to protect or improve locally</p>	<p>Table 4.2 of the SEA Environmental Report presents the assessment framework. Against the SEA objective for biodiversity, flora and fauna, there is a guide question regarding the locally important (non-designated) sites "Will it [the water resource option] protect, restore and enhance non-designated sites and local biodiversity?". Guidance on determining whether such an effect is positive or negative and minor, moderate or significant is presented in Appendix E 'Definitions of Significance'. For example, a minor positive effect is defined as "The option would result in a minor enhancement of the quality of designated and/or non-designated sites / habitats due to changes in flow or groundwater levels, water quality or habitat creation and enhancement measures." Appendix F and G present the findings of the individual revised feasible and preferred option assessments. These include reference to LNRs e.g. for WR015,</p>

Consultation Question	Section	Consultee Response	Response/Action
		important sites (undesigned sites), including those supporting priority habitats and species.	there are "3 [LNRs] within 1km of the option (Chapelfield, approximately 0.3km from the works, Clifton Country Park, approximately 0.5km from the pipeline works and Moses Gate approximately 1km from the works.) whilst the remaining LNRS would be situated 1.1km or more from the works. It is not anticipated that there will be any significant effects from construction on any of the SSSIs due to the distance between the works and the closest sites, however, where the works are situated in close proximity to the LNRs highlighted above there is potential for disturbance (e.g. noise/vibration/dust deposition/air quality impacts." Where relevant, the SEA of United Utilities revised preferred options has been amended.
N/A		<p>Issue 2.4: Eels Regulations implications on the supply forecast</p> <p>The Eels Regulations are referred to in the National Plans and Programmes and Sub-regional/local plans and programmes sections of the SEA, outlining how the WRMP should take account of eel management plans. There is insufficient information provided to demonstrate how the measures needed under the Eels Regulations have been incorporated into the plan and any implications the measures have on the supply forecast.</p> <p>The lack of information surrounding the measures required for the Eels Regulations and any implications on the supply forecast poses a risk to the accuracy of the supply forecast.</p> <p>The company should:</p> <ul style="list-style-type: none"> • provide a clear explanation on whether any measures are required for the Eels Regulations within the plan • clearly identify within the plan any implications the measures may cause on the supply forecast • provide a clear explanation within the plan about how the implications have been considered and mitigated 	Comment noted.

Table B.7 Responses to NRW comments on the draft SEA Environmental Report

Consultation Question	Section	Consultee Response	Response/Action
		<p>Environmental assessment of options</p> <p>The company's preferred draft plan includes supply schemes that could affect the environment within Wales.</p> <p>With regards to the Severn Thames Transfer Strategic Resource Option (STT SRO) scheme we consider that the Habitats Regulations Assessment (HRA) work undertaken to date, cannot rule out Likely Significant Effects on the features of the Severn Estuary / Môr Hafren Special Area of Conservation (SAC) and the Severn Estuary RAMSAR. Additional water released from Lake Vyrnwy will impact the Afon Vyrnwy, and the mobile species from the Severn Estuary SAC which utilise these habitats, during a critical life stage for these species (i.e. this waterbody is functionally-linked to the SAC). The company will have to incorporate the impacts to the designated features whilst utilising these waterbodies within their appropriate assessment and site integrity test.</p>	<p>The revised preferred options selected in United Utilities revised draft WRMP24 do not include the Severn to Thames Transfer Strategic Resource Option (STT SRO) as this is considered as an alternative scenario as part of Severn Trent Water's WRMP24. The STT SRO is also subject to the separate RAPID Gated decision making process which includes separate environmental assessment. Severn Trent will however be taking 25 MI/d from Vyrnwy raw water via the Afon Vyrnwy starting in 2030 and this is included in the Severn Trent Water's revised draft WRMP24 and as enabling works in the United Utilities revised draft WRMP24 and so will be subject to SEA, HRA and WFD assessment. The HRA of the revised draft WRMP24 has considered this option and has not identified any likely significant effects. The WFD assessment has identified it as a compliant option.</p>
		<p>In addition, we are also concerned that this option is not fully compliant with the Water Framework Directive Regulations (WFD Regs). All necessary permits including full HRA and WFD Regs assessments of all likely impact pathways must be undertaken prior to the scheme becoming operational, including the impacts from the proposed increase in releases from Lake Vyrnwy.</p>	<p>The revised preferred options selected in United Utilities revised draft WRMP24 do not include the Severn to Thames Transfer Strategic Resource Option (STT SRO) as this is considered as an alternative scenario as part of Severn Trent Water's WRMP24. The STT SRO is also subject to the separate RAPID Gated decision making process which includes separate environmental assessment. Severn Trent will however be taking 25 MI/d from Vyrnwy raw water via the Afon Vyrnwy starting in 2030 and this is included in the Severn Trent Water's revised draft WRMP24 and as enabling works in the United Utilities revised draft WRMP24 and so will be subject to SEA, HRA and WFD assessment. The HRA of the revised draft WRMP24 has considered this option and has not identified any likely significant effects. The WFD assessment has identified it as a compliant option.</p>
		<p>There could also be potential impacts to the environment in respect to the preferred option for a release from Vyrnwy to the River Severn a part of a trade agreement with Severn Trent Water. The final plan must clarify the volume of water which is to be traded with Severn Trent Water as the United Utilities dWRMP states 75 Megalitres per day and the Severn Trent dWRMP states 25 megalitres per day. The company must also ensure that prior to this becoming operational a full HRA and WFD Regs assessment must be completed, and all required permits obtained.</p>	<p>Severn Trent will be taking 25 MI/d from Vyrnwy raw water via the Afon Vyrnwy starting in 2030 and this is included in the Severn Trent Water's revised draft WRMP24 and as enabling works in the United Utilities revised draft WRMP24 and so will be subject to SEA, HRA and WFD assessment. The HRA of the revised draft WRMP24 has considered this option and has not identified any likely significant effects. The WFD assessment has identified it as a compliant option.</p>

