



Thames Water Draft Water Resources Management Plan 2024

Statement of Response

Appendix C:

Response to representations from
Natural England

August 2023



Introduction

The Natural England representation to the consultation on our draft Water Resources Management Plan (WRMP24) comprised one document. This document has four sections:

- A letter which prefaces the main representations, including a summary of Natural England's comments
- Annex 1: Natural England's advice on Thames Water draft Water Resources Management Plan (dWRMP) 2024 – in this annex, Natural England provide detailed representations on matters within Thames Water's dWRMP24
- Annex 2: Policy and Legislative Context to Natural England's Advice on draft Water Resources Management Plans 2024 – in this annex, Natural England outline the key elements of legislation and policy to which they have had regard when preparing their representations
- Annex 3: Role of Natural England in Advice to the Water Sector – This annex outlines Natural England's role with respect to the advice given to the water sector

We have considered all of the points raised by Natural England in relation to the draft Water Resources Management Plan. In this appendix we present a table in which we set out the representations raised in the initial summary and Annex 1 of their representation, along with our consideration of these representations and any changes made to the plan as a result (or if no changes are made, why not). Annexes two and three provide context for their representation, but matters are not raised in these annexes and so we have not included them here.

We have copied the text from the Natural England representation directly.



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>In our review of Thames Water’s dWRMP, Natural England has considered how the company has addressed its environmental obligations as set out in The Water Industry Strategic Environmental Requirements (WISER) and how the dWRMP supports the ambitions in Government’s recently published Environmental Improvement Plan (previously the 25 Year Plan)</p>	<p>Thank you for your response.</p>	<p>No changes – none requested</p>
<p>Natural England considers that Thames Water’s dWRMP contains insufficient evidence to support the conclusions of the Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA). In particular, there is insufficient information to determine impacts on Thursley, Hankley & Frensham Commons SPA, Thursley & Ockley Bogs Ramsar, Richmond Park SAC, Wimbledon Common SAC, South West London Waterbodies SPA/ Ramsar, Cothill Fen SAC, Thames Estuary and Marshes Ramsar/ SPA and North Wessex Downs AONB. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation, if any. The information required is set out in Annex 1.</p>	<p>Thank you for your comment. We have considered individual items under this overall response as they are raised within your representation.</p>	<p>See individual items under this general response theme.</p>



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<p>There is a lack of detailed mitigation and monitoring for protected sites, habitats and species where impacts cannot be ruled out. Within the SEA, details of the impacts of options on designated sites are not included. This means that impacts are not linked directly to any monitoring and mitigation actions. Thames Water must address this within the final plan.</p>	<p>Thank you for your comment. Whilst we have included anticipated impacts on designated sites within our draft plan SEA report, we appreciate that these in some cases could benefit from being described in further detail, and have reviewed Appendix B with this in mind to provide further detail where feasible. The strategic nature of the current planning stage should be borne in mind when considering the required level of detail. We have also included our individual options' SEA assessment sheets in full to assist with providing this detail. We have ensured detailed mitigation and monitoring is included in relation to these impacts for protected sites, habitats and species where feasible and reasonable, considering the strategic nature of this planning stage and the anticipated date of delivery of our preferred options.</p>	<p>See rdWRMP24 Appendix B and C which have been updated as described in our consideration, in response to this representation.</p>
<p>The Environmental Destination (as defined in the Regional Plan modelling that has been relied upon by Thames Water) does not go far enough, fast enough nor it is prioritised in the correct locations to meet the nature recovery obligations set out in Annex 2 of this letter. In addition, the company has timed the measures it does include within its plan towards the end of 2050. This is too late to meet many of the nature recovery obligations set out in Annex 2.</p>	<p>In our dWRMP, our preferred programme facilitated achievement of the “Enhanced” scenario of abstraction reductions set out in the National Framework for Water Resources, through our high environmental destination scenario. Noting that some abstraction reductions were included after the 2050 “backstop” date. We have considered feedback received from the EA and Natural England that it is not acceptable to plan for Environmental Destination reductions to be made to be after 2050, and as such we have moved our environmental destination scenarios so that all reductions are made by 2050 in the high scenario, meeting the National Framework for Water Resources expectation.</p> <p>The National Framework for Water Resources, published in March 2020 sets the environmental</p>	<p>Changes made are as follows:</p> <p>We have altered the profiles of some licence reductions used as input datasets in our WRMP. This is presented in Section 5 of the WRMP. The main changes are:</p> <ul style="list-style-type: none"> - Advancement of the timing of reductions at Lower Lee and NNRWs from 2060 to 2050, to comply with the 2050 date requirement. - New Gauge DO reduction moved from 2060 to 2050, to comply with the 2050 date requirement - Advanced timing of reductions at Farmoor and Ashton Keynes from 2050 to 2040, with justification given in Section 5. - Epsom reduction moved back from 2030 to 2035 in response to EA feedback on draft WINEP.



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	<p>ambition required to address unsustainable abstraction between 2025 and 2050 on a national scale. The Framework sets out that Regional Water Resource Plans are required to develop an agreed environmental destination to achieve sustainable abstraction by 2050. WRSE worked with the Environment Agency and all water companies in the South East region to develop agreed Environmental Destination scenarios. They developed five scenarios, Low, Medium, High, BAU+ and Enhanced. We have integrated the Low, Medium and High, into our supply forecast. These scenarios are known as scenarios of 'Environmental Destination'. For Thames Water the High scenario equates with the Enhanced scenario, and this is common with most of the WRSE water companies.</p> <p>Within these scenarios, we are required to consider the Environmental Destination scenarios set out in Appendix 4 of the National Framework for Water Resources (WRPG says that companies in England should use guidance titled "Long term water resources environmental destination", and in this guidance it says that companies should use the BAU and Enhanced scenarios).</p> <p>The guidance document, "Long term water resources environmental destination" states, "use the 2050 BAU scenario as the starting point to ensure you comply with current statutory and regulatory requirements in the future" and "use the enhanced scenario to identify where it may be necessary to provide enhanced protection to buffer from predicted climate change impacts". The WRSE Regional Plan led the development of the Environmental Destination</p>	<p>In Section 5 of the rdWRMP we have included additional discussion of the assessment of feasible timescales for implementation of licence reductions.</p>



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	<p>scenarios, in line with the National Framework for Water Resources. Given that the DO reductions which result from the BAU+ scenario and Enhanced scenario are very similar, we have used the Enhanced scenario in our preferred plan. Our consideration is, as such, that guidance is clear that planning on the basis of the scenarios in the National Framework ensures compliance.</p> <p>Alongside ensuring compliance with guidance, we have also considered whether there are opportunities to accelerate the process of investigation, identification of required abstraction reductions, design and implementation of solutions, and we have considered whether we could adapt our schedule of licence reductions.</p> <p>We do not consider that applying a fractured approach to delivering the programme of reductions sooner than this revised schedule would present best value to customers, because of the need for significant replacement resources and replacement infrastructure to enable reductions to be made for both London and the Thames Valley. Therefore, we do not consider it realistic to plan for a programme of reductions that would be quicker than that set out in our revised draft plan. We consider the process of investigation to establish need, design of solution to assess cost-benefit, followed by implementation to be very important, and the timescale set out in our revised draft plan would allow for this.</p>	



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	<p>Through our 'Vulnerable Catchments' workstream and the WINEP actions associated with determining a Regional Environmental Destination, in AMP8 we will look to determine whether there are catchment interventions that could be made which will mitigate interim environmental risks and/or negate the need for licence reductions in future.</p>	



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<p>The early stages of the plan focus on demand management. This backloads improvements to post-2040, which may not support government environmental ambitions. Moreover, there are numerous options which increase abstraction within Thames Water's supply area. Whilst these seek to use headroom in existing licences, this is still moving away from the need to reduce abstraction and leave more water in the environment for wildlife.</p>	<p>We included several groundwater options in our constrained list of options for our draft plan. As mentioned in your response, some of these options deliver benefit by improving capacity of the works so that more water can be abstracted and treated within currently licensed limits. The WFD assessments for these options have been reviewed and updated as needed, with other assessments reviewed in light of these changes. We have included further technical information on the intended operation of the options to make our position on their sustainability clearer and more comprehensively justified, as well as making any risks clearer. We have detailed any further work needed as well as any needed mitigation and monitoring, making it clear as to when and how we anticipate this will be carried out. This approach has been discussed with local EA teams and NE. We are committed to reducing abstractions where these impact sensitive environmental receptors - this necessarily must be offset to a certain extent by increasing supply from the rest of our supply schemes to enable us to fulfil our duties regarding supply security.</p> <p>Please see our response to the comment above regarding the timing of licence reductions.</p>	<p>See rdWRMP24 Appendix C and D for details of the further technical information used in screening options.</p> <p>Please see our response to the comment above regarding changes made to the plan associated with the timing of licence reductions.</p>



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<p>The plan does not meet Water Resources Planning Guideline (WRPG) target of reducing per capita consumption to 110 l/p/d by 2050.</p>	<p>We fully support the government's plans to introduce measures to support long-term, sustainable water use across the UK.</p> <p>Taking government-led and our own actions into account, we forecast (in our draft plan) that average water use in our area would reduce to around 123 litres per head per day by 2050. Since our draft WRMP further guidance has been received from the Environment Agency, Ofwat and Defra that sets a clear policy pathway to 110 l/h/d by 2050 and new targets for NHH too. We aim to achieve these new household and non-household targets in our revised draft plan through some improvement in our reductions and further government led reductions. We made it clear in our draft WRMP that further customer reductions were challenging from the analysis carried out to date, and we maintain that reducing consumption remains difficult, as the activities that are within our power are limited and as such we are very dependant on external factors.</p>	<p>Changes to our plan include:</p> <p>Our revised draft plan includes achievement of the 110 l/h/d by 2050 PCC target.</p> <p>Our revised draft plan includes significant non-household demand reduction activity</p> <p>Our revised draft plan meets the Environment Act targets at the company, apart from the 2037/38 PCC target (our plan hits 126.2 l/h/d PCC in 2037/38), which is a national target.</p>
<p>It is clear that Thames Water have thoroughly engaged stakeholders throughout WRMP process and have been involved in WRSE regional plan stakeholder consultations. Overall, Natural England has been happy with our level of engagement.</p>	<p>We are pleased that you feel that you have been engaged well on our draft plan.</p>	<p>None - no change requested or suggested.</p>



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<p>Within Section 2 – Environment, Thames Water say they are considering the impact of planning at a landscape scale and better support approaches such as Nature Recovery Networks, and this has been enabled via working with WRSE and using a GIS database allow them to understand the potential impacts of options and opportunities to benefit the local environment. Natural England supports this ambition, and hopes that this is followed through. This is particularly important considering the number of large strategic resource options (SROs) that feature within the plan.</p>	<p>Thank you for your comment. We are continuing our work in this area within our WRMP24 with the development of our BNG strategy, a holistic delivery strategy to achieve ambitious net gain across our Non-SRO and SRO options as part of our plan. This strategy is available as part of our revised draft plan, and we will continue this work over future planning cycles.</p>	<p>No changes have been made pursuant to this response directly, as no change was requested or suggested. However, the following changes are relevant: BNG strategy added as Annex to rdWRMP24 Appendix AA.</p>



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<p>Thames Water’s ambition to move away from reliance on drought permits/ orders is a welcome move towards greater environmental resilience. In section 7 Thames Water note that in their WRMP19 they “did not consider drought permits as options that [they] should rely on to provide security of supply, due to the fact that drought permit applications can be declined (i.e., these options do not provide a secure source of supply), and due to the negative environmental impacts that they bring. As such, [they] effectively rejected drought permits at the generic screening stage.” It is unclear whether, in a drought, Thames Water would still use the permits detailed in their Drought Plan 2022, particularly those which were considered for use in 2022, or if the aforementioned statement supersedes this.</p>	<p>We can confirm that we would seek to use the drought permits detailed in our Drought Plan 2022 if conditions necessitated this and the EA agreed to their use. As part of our WRMP24 we are working to achieve resilience to a 1:500 year drought without the use of these permits by 2040. In line with the WRPG, we have considered some of our drought permits as options within our WRMP (prior to 2040) on the condition that these have minor environmental impacts as agreed with the EA.</p>	<p>No change has been requested or suggested in this response.</p>
<p>There are numerous options which rely on transfers from other UK water companies, for example Lake Vyrnwy (United Utilities) – 180MI/d Wessex to SWOX option. Natural England understands that water scarcity is a concern in other regions, and we highlight the risk of relying on water from water-stressed areas which are currently struggling to meet the needs of the environment.</p>	<p>Thank you for your comment. Throughout the WRMP24 process, we have iteratively reviewed the feasibility of our option list in light of this issue, and have worked with third parties to update the feasibility on each option as needed (notably through the regional reconciliation process). For our revised draft plan, this has resulted in rejecting our Wessex to Flaxlands (SWOX) option owing to this option no longer being stated as available by Wessex Water.</p> <p>Where there is uncertainty caused by the risk of simultaneous drought across multiple regions, we</p>	<p>We have rejected the transfer from Wessex Water to our SWOX zone as a result of ongoing dialogue with other water companies; this has been reflected in an update to rdWRMP24 Appendix Q. We have not made other changes to our plan following this comment as we consider that we have adequately considered the risk of relying on water from other regions when assessing the supply benefits of different options.</p>



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	<p>consider that we have accounted for this within the Deployable Output benefit assessment of the STT options. We do, however, consider the yield of the unsupported STT to be less reliable than that of alternative options, with there being significant variations in year-to-year availability of flows above the HOF.</p>	



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<p>There are multiple schemes which use headroom in existing licences or recommission sources. Though these make use of what has previously been permitted, this does result in a net increase in abstraction. This is not in line with environmental ambitions to reduce abstraction and leave more water in the environment for wildlife:</p>	<p>Overall, we will always look to secure abstraction in places where we know the environmental impact of this is acceptable. Where we suspect there are damaging impacts, we will investigate, and if these are found, work to reduce these abstractions.</p> <p>As you have mentioned, we included several options in our constrained list of options for our draft plan that deliver benefit by either recommissioning a source or improving capacity of the works so that more water can be abstracted and treated, all within currently licensed limits. The WFD assessments for these options have been reviewed and updated as needed, with other assessments reviewed in light of these changes. We have included further technical information on the intended operation of the options to make our position on their sustainability clearer and more comprehensively justified, as well as making any risks clearer. We have detailed any further work needed as well as any needed mitigation and monitoring, making it clear as to when and how we anticipate this will be carried out. This approach has been discussed with local EA teams and NE. We are committed to reducing abstractions where these impact sensitive environmental receptors - this necessarily must be offset to a certain extent by increasing supply from the rest of our supply schemes to enable us to fulfil our duties regarding supply security.</p> <p>It is also worth noting that the planned demand management actions within our WRMP lead to an overall decreasing trend in demand for water, and thus an overall decrease in abstraction predicted.</p>	<p>See rdWRMP24 Appendix C and D which have been updated as described in our consideration, in response to this representation.</p>



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o Datchet Increase DO Option	See above	See above
o Woods Farm Increase DO	See above	See above
o Moulsoford 1 groundwater option	See above	See above
o Britwell	<p>Following a review of this option for the revised draft plan, this option has been rejected on the basis that we have been asked to carry out a WFD no deterioration investigation and as a result have planned for there to be a reduction in licence at this source to meet the No Deterioration requirement, making this option unfeasible.</p> <p>If the investigation shows no risk of deterioration from increase to licence then the scheme could be considered to be reintroduced at a later date.</p>	<p>The plan has been updated to reflect that this option has been rejected, with the reasoning for this. This is reflected in rdWRMP24 Sections 7, 9, Appendices D, P, Q and R.</p>
o Groundwater Addington	See above	See above
o ASR Horton Kirby	See above	See above
o Mortimer Disused Source (Recommissioning)	See above	See above
o Merton Recommissioning	See above	See above
o Woods Farm Increase DO	See above	See above
o Didcot Raw Water Purchase.	<p>We do not understand there to be any issues with the sustainability of this option with regards to the abstraction of the water available under part of RWE's licence. This option involves a licence trade between Thames Water and RWE, and does not involve a larger volume of abstraction overall in the Thames catchment. Indeed, in the reach between Didcot and Windsor, this option could increase flows during drought periods.</p>	<p>No change needed, commentary provided.</p>



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<p>WRMP19 and Natural England's previous response: Overall, there are few major differences between WRMP19 and WRMP24 in regard to general approach to water supply at a water resource zone (WRZ) scale. For this reason, much of Natural England's previous advice still remains relevant during WRMP24 review where issues have not been resolved.</p>	<p>We have considered responses raised below which are taken from the WRMP19 representation.</p>	<p>No change has been requested or suggested in this response.</p>
<p>WRMP19 and Natural England's previous response: Between the two planning periods, there are two new groundwater schemes, which was not expected given the water sector's ambition to reduce such activities.</p>	<p>Overall, we will always look to secure abstraction in places where we know the environmental impact of this is acceptable. Where we suspect there are damaging impacts, we will investigate, and if these are found, work to reduce these abstractions.</p> <p>The WFD assessment for the options you refer to have been reviewed and updated as needed, with other assessments reviewed in light of these changes. We have included further technical information on the intended operation of the options to make our position on their sustainability clearer and more comprehensively justified, as well as making any risks clearer. We have detailed any further work needed as well as any needed mitigation and monitoring, making it clear as to when and how we anticipate this will be carried out. This approach has been discussed with local EA teams and NE. We are committed to reducing abstractions where these impact sensitive environmental receptors - this necessarily must be offset to a certain extent by increasing supply from the rest of our supply schemes to enable us to fulfil our duties regarding supply security.</p>	<p>See rdWRMP24 Appendix C and D which have been updated as described in our consideration, in response to this representation.</p>



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WRMP19 and Natural England's previous response: Natural England highlighted options which we considered to pose high environmental risk, or those which we consider offer significant potential for biodiversity. These included Abingdon Reservoir, Teddington Direct River Abstraction (DRA) and Beckton Reuse.	See below	See below



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<p>Abingdon Reservoir (also referred to as South East Strategic Reservoir Option - SESRO) remains a concern. Though there has been further assessment and inclusion of potential sites affected including the AONB, the summary of SEA assessment and reasoning behind scoring has not been included. At present due to the additional resource availability and potential use of the reservoir as habitat and recreation, moderate positive effects were identified for landscape and climate. Moderate negative effects were identified for biodiversity (impacts on protected sites), soil (agricultural land), landscape, historic environment, and population (due to potential for disturbance). See section 1.2 for detailed concerns regarding protected habitats, sites and landscapes. Greater explanation is needed to support the assessment conclusions, though this is a common theme throughout the SEA and HRA. As the first year of use for this option is expected to be 2039/40, there is time for further assessment, though inclusion of details presented in the Regulators' Alliance for Progressing Infrastructure Development (RAPID) gated process assessments on environmental assessments would be welcomed.</p> <ul style="list-style-type: none">o Natural England will continue to engage with Thames Water and the Environment Agency during development of this scheme via the RAPID process.	<p>Thank you for your response. We have reviewed the SEA report for our draft plan and sought to provide the detail requested (summary of SEA assessment and reasoning behind scoring) by including further content as relevant from the RAPID Gate 2 report for this scheme. This is available in the SEA report for our revised draft plan. We will also be furthering this work as planned via the next stage of the RAPID gated process for the strategic resource options, in which environmental impacts, mitigation and opportunities for these schemes will be explored in further detail in consultation with our regulators.</p>	<p>See rdWRMP24 Appendix B which have been updated as described in our consideration, in response to this representation.</p>



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<p>Since WRMP19, Natural England has engaged in the development of Teddington Direct River Abstraction (DRA) via the RAPID process. As this scheme is expected to be in use by 2030/31, certainty regarding environmental assessments and inclusion of appropriate mitigation is needed. Though Natural England concur with assessments on protected sites, there is still uncertainty on the impacts on sensitive environmental receptors such as protected species of fish and riverine habitats. Natural England would welcome the addition of more thorough consideration of potential mitigation beyond general types of measures.</p>	<p>Thank you for your response. As detailed in the Gate 2 submission and our draft plan, an assessment has been undertaken of the WFD compliance of a Teddington DRA scheme sized at 50 MI/d, 75 MI/d, 100 MI/d and 150 MI/d.</p> <p>At Gate 2, no expected potential for status deterioration or introducing impediments to target status was identified in the Thames (Egham to Teddington) (GB106039023232). However, minor changes to physico-chemical water quality were noted at the 100 MI/d and greater scheme size. Potential mitigation (treatment) options are outlined in the annex B.2.2 which will need to be further refined in Gate 3.</p> <p>No potential for status deterioration or introducing impediments to target status were identified in the Thames Upper (GB530603911403) water body for any Teddington DRA size. 6.16. This assessment has been supported by bespoke modelled and measured data on pathways of impact and have a medium to high confidence.</p> <p>Regarding HRA, the informal Stage 1 Screening identified the risk of LSE associated with construction of Teddington DRA for qualifying features of Richmond Park Special Area of Conservation (SAC).</p> <p>The informal Stage 2 Appropriate Assessment concluded, that with implementation of</p>	<p>No changes made as a result of this representation, for reasons set out in consideration.</p>



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	<p>appropriate mitigation measures to avoid removal of deadwood habitat, the impact pathways could be suitably controlled such that the scheme would not result in an adverse effect on the integrity of the European site alone or in-combination.</p> <p>Further assessment and development of mitigation programmes will be undertaken as part of Gate 3 detailed design and environmental appraisal for this scheme. These assessments and details of mitigation proposed to ameliorate any impacts will be reported as part of this Gate 3 submission.</p>	



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<p>Previously, Thames Water attempted to apply the Natural Capital Approach to supply side options, though available data were not robust enough to conduct assessments. Though there are still some omissions due to lack of data for some sites, there seems to have been an improvement within WRMP24 in the number of options included in the assessment. Natural England welcomes the inclusion of a Natural Capital and Biodiversity Net Gain assessment. However, as with WRMP19, it is not clear how Thames Water will proceed in securing BNG for larger SROs. See section 1.4.3 for further details.</p>	<p>Thank you for your response. We are continuing our work in this area within our rdWRMP24 with the development of our BNG strategy, a holistic delivery strategy to achieve ambitious net gain across our Non-SRO and SRO options as part of our plan. This strategy is available as part of our revised draft plan, and we will continue this work over future planning cycles.</p>	<p>Please see rdWRMP24 Appendix AA for our BNG strategy, created as part of planned work following draft plan.</p>
<p>Natural England commented that there was insufficient information in the Habitats Regulations Assessment (HRA) Screening Report to exclude on the basis of objective evidence a likely significant effect in all cases. This is still the case, particularly as many options are in early stages of development, and the mitigation proposed is non-specific. See section 1.1 for further details.</p>	<p>See response to Section 1.1 below.</p>	<p>See response to Section 1.1 below.</p>



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<p>Natural England highlighted that some areas of the SEA required further work or clarification. There were instances where the SSSI assessment appeared incomplete, or where the wrong features have been assessed. Further evidence of assessment of potential impacts were needed for some sites. Though there does seem to have been some improvement regarding incorrect assessments, there is still a varied level of specificity of the SEA.</p>	<p>See below</p>	<p>See below</p>
<p>Environmental Destination: It is understood that there is a lot of work to be done to determine the licence reductions required without understanding the extent of impacts of Thames Water abstractions are having on ecological receptors. Therefore, Natural England supports the use of WINEP investigations to gather evidence of asset impacts. It is noted that all environmental scenarios include licence capping at “recent actual” abstraction. However, it is important to note that in many cases this will not be enough to ensure nature recovery. It is not enough to just avoid further deterioration.</p>	<p>We note the support from Natural England for the use of WINEP investigations to gather evidence of asset impacts. We also note NE’s view that licence capping at “recent actual” abstraction will not be enough to ensure nature recovery. We recognise this and that is why we have included the reductions which go beyond this and deliver the reductions included in the scenario specified by the guidance and policy.</p>	<p>No change required as the plan already delivers more than the requirement to cap at recent actual and explains why.</p>



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<p>Environmental Destination: It is positive to see that, in response to a government challenge in 2021, Thames Water put forward the Pang and Chess as flagship catchments for recovery of Chalk Streams. Understanding the impacts of abstraction will support the targeted reduction required. However, chalk streams and rivers are not the only water-dependent sensitive habitat within Thames Water’s supply area, and this should be reflected when considering licence reductions.</p>	<p>We recognise that chalk streams and rivers are not the only water-dependent sensitive habitats within Thames Water’s supply area. However, the focus required under the guidance is to meet the environmental destination requirements as specified through the scenarios from the National Framework for Water Resources and so this is our principal focus when planning the environmental destination path to follow. We will include consideration of other water-dependent sensitive habitat as necessary through the investigations that we plan to confirm the exact trajectory of our environmental destination programme that is delivered.</p>	<p>We have added reference in Section 5 of the plan to say that the reductions we plan will principally benefit chalk streams and rivers but that other water dependent habitats will be considered in the detailed investigations and improvements made where necessary.</p>



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<p>Environmental Destination: Thames Water explained that: “It is important to note that none of our scenarios align exactly with the EA’s ‘BAU+’ scenario. Our High scenario will align most closely with the BAU+ scenario, as such a scenario would be based on achievement of the EFI at specific assessment points, and we have seen that there is limited difference between the different EA scenarios.” It is Natural England’s opinion that BAU+ scenario may not achieve reductions required to meet the needs of all sensitive environmental receptors protected under the Habitats Regulations and Wildlife and Countryside Act 1981 as amended, namely non-European sites (i.e., SSSIs) or non-riverine sites (e.g., wetland habitats). We also consider it insufficient to meet targets in the Government’s 25 Year Environment Plan and the recently-published Environmental Improvement Plan (see below, and Annex 2 for further details).</p>	<p>In both our draft and revised draft WRMP, our “High” scenario (that used in our preferred plan) met the requirements of the “Enhanced” scenario set out in Appendix 4 of the National Framework for Water Resources.</p> <p>The guidance document, “Long term water resources environmental destination” states, “use the 2050 BAU scenario as the starting point to ensure you comply with current statutory and regulatory requirements in the future” and “use the enhanced scenario to identify where it may be necessary to provide enhanced protection to buffer from predicted climate change impacts”. The WRSE Regional Plan led the development of the Environmental Destination scenarios, in line with the National Framework for Water Resources. Given that the DO reductions which result from the BAU+ scenario and Enhanced scenario are very similar, we have used the Enhanced scenario in our preferred plan. Our consideration is, as such, that guidance is clear that planning on the basis of the Enhanced scenario ensures compliance.</p>	<p>No changes have been following this response, for the reasons highlighted in our consideration.</p>
<p>Environmental Destination: It is noted that the sites chosen for abstraction reduction have been based on being chalk stream habitats. It likely that these reductions would result in improvements in other habitats, but this has not been explored. Natural England encourages Thames Water to make links between sustainability reductions and other groundwater dependent ecosystems (GWDEs).</p>	<p>We recognise that the abstraction reductions included in the environmental destination will have benefits, in some cases, for other groundwater dependent ecosystems (GWDEs). These other benefits will be explored through the more detailed investigations into abstraction impact that are planned as part of our environmental destination programme.</p>	<p>No change made for reasons set out in consideration.</p>



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<p>Environmental Destination: Though the volume of reductions is positive, the timing shows them largely occurring in 2040-2050. Where a large majority occur 2050 onwards, Natural England encourages Thames Water to move these forward if the abstractions are damaging the environment to support government targets relating to protection of sensitive habitats.</p>	<p>Alongside ensuring compliance with guidance, we have also considered whether there are opportunities to accelerate the process of investigation, identification of required abstraction reductions, design and implementation of solutions, and we have considered whether we could adapt our schedule of licence reductions.</p> <p>Generally, we do not consider that applying a fractured approach to delivering the programme of reductions sooner than this revised schedule would present best value to customers, because of the need for significant replacement resources and replacement infrastructure to enable reductions to be made for both London and the Thames Valley. Therefore, we do not consider it realistic to plan for a programme of reductions that would be quicker than that set out in our revised draft plan. We consider the process of investigation to establish need, design of solution to assess cost-benefit, followed by implementation to be very important, and the timescale set out in our revised draft plan would allow for this.</p>	<p>Changes made are as follows:</p> <p>We have altered the profiles of some licence reductions used as input datasets in our WRMP. This is presented in Section 5 of the WRMP. The main changes are:</p> <ul style="list-style-type: none"> - Advancement of the timing of reductions at Lower Lee and NNRWs from 2060 to 2050, to comply with the 2050 date requirement. - New Gauge DO reduction moved from 2060 to 2050, to comply with the 2050 date requirement - Advanced timing of reductions at Farmoor and Ashton Keynes from 2050 to 2040, with justification given in Section 5. - Epsom reduction moved back from 2030 to 2035 in response to EA feedback on draft WINEP. <p>In Section 5 of the rdWRMP we have included additional discussion of the assessment of feasible timescales for implementation of licence reductions.</p>



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<p>Drought plan: Within Section 5, Environmental Forecast, table 5-2 highlights abstraction sources which should be prioritised for reduction within low and medium scenarios of environmental destination. Some of these sources are used within Thames Water’s drought plan, and therefore Thames Water should ensure that the two plans are aligned if it is expected that these sources be relied upon in the future.</p>	<p>There are sources that are in the environmental destination scenarios and are also included in the Drought Plan. This is consistent because some sources that feature in the Drought Plan are sources where sustainability reductions are planned for the future but in a very severe drought these sources would be needed through drought permits to ensure security of supply. An example is Latton where it is a drought permit option for severe drought but is also a site where we plan to make further reductions in licensed abstraction for sustainability reasons. The likelihood of needing to use these sources in a severe drought will be significantly reduced as we move to be come resilient to 1:200 year drought and then to 1:500 year drought.</p>	<p>No changes have been made to our WRMP following this response, as our consideration is that these plans are aligned.</p>
<p>1.1 Habitats Regulations Assessment (HRA): Water Companies have a statutory duty to prepare Water Resource Management Plans (WRMPs) and are the Competent Authority for Habitats Regulations Assessment (HRA) of the draft WRMP. Natural England has reviewed the HRA submitted with this dWRMP, and makes the following comments:</p>	<p>N/A - general comment/intro</p>	<p>N/A - general comment</p>



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<p>· Though the HRA screening seems largely appropriate (with exceptions explored below), there are some concerns regarding the detail contained within the Appropriate Assessments. Natural England understands that due some options being in early stages, the scheme plans have not been fully developed and mitigation measures are therefore non-specific.</p>	<p>See below</p>	<p>See below</p>
<p>HRA has not been completed for the drought permits that are included as options (Shalford Drought Permit, Harpsden / Sheeplands Drought Permit, Playhatch Drought Permit, Gatehampton Drought Permit). The Playhatch and Gatehampton drought permits were assessed by Ricardo Energy & Environment which undertook a SEA and concluded that a HRA was not required. This process is not appropriate, and findings of any screening for likely significant effects on Habitats sites should be included in the HRA.</p>	<p>The drought plan has been subject to an HRA screening process which has addressed all the drought permit options in our Drought Plan and therefore has covered these sources. The Playhatch and Gatehampton drought permits were assessed by Ricardo Energy & Environment which undertook a SEA and concluded that a HRA was not required. However, these sources were subject to the HRA screening process undertaken for the Drought Plan which concluded that these sources have no impacts on European designated sites. This information has been included in the revised draft plan SEA and HRA assessment reports to make this clearer.</p>	<p>Further clarification provided in response to this representation - please see rdWRMP24 Appendix B and C.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>Natural England commends Thames Water for the catchment measures being included as options for the WRMP, namely the Colne Integrated Catchment Management Scheme which will lead to greater environmental resilience and biodiversity improvements. Though these catchment measures may not provide direct deployable output benefits and primarily seek to improve environmental functioning, as an option within the WRMP they should be considered within the relevant environmental assessments. This includes the HRA, SEA, Natural Capital (NC), Biodiversity Net Gain (BNG) and Invasive Non-Native Species (INNS) assessments. Natural England defers to the Environment Agency on Water Framework Directive (WFD) requirements.</p>	<p>Thank you for your comment. We have considered a range of catchment options across our supply area, and have ascertained those nature-based solutions which we can be confident will deliver supply benefits. The draft regional plan selected a portfolio of catchment options for the Colne catchment; while we do support these measures we did not feel it appropriate for the draft plan to include this portfolio for Thames Water's plan as it was not seen to provide any deployable output benefit to the Thames Water area; it does provide this benefit to Affinity Water's supply area.</p> <p>As part of our work to support the development of nature based solutions for water resources planning, we are working with WRSE to deliver a regional WINEP (Water Industry National Environment Programme) investigation to further understand the benefits of these schemes (by delivering pilot studies) and identify opportunities regionally for catchment management schemes to improve ecosystem resilience where these will deliver the biggest benefit. For the draft plan, we assessed catchment options against SEA only, due to the reduced information for these options. We will look to expand this work to cover more assessment types as we gain more knowledge about these options over the next planning cycle.</p>	<p>No change needed, commentary provided.</p>



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<p>The HRA is a clearly identifiable document and follows the expected steps of screening and appropriate assessment. Within the footnotes in section 18, reference is made to this being an “informal HRA”. We are unclear what is meant by this.</p>	<p>Thank you for your comment. We can confirm that the term 'informal HRA' was used in error and has been removed from this report in the revised draft plan.</p>	<p>Term 'Informal HRA' removed from rdWRMP24 Appendix C.</p>
<p>As far as possible with the information presented, it seems that the relevant Habitat Sites have been identified. The screening steps use a Zone of Influence (Zol) of 10km as recommended by UKWIR guidance, but notes that there may be exceptions based on functional habitat and the nature of protected sites/ habitats/ species.</p>	<p>(Response not needed)</p>	<p>No change has been requested or suggested in this response.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>When considering impacts from construction activities, the sensitivity of receptors and the acceptability of disturbance varies throughout the year. Moreover, in some cases the relevance of noise pollution levels is less about the overall increase in noise, but the increase above ambient levels. At certain times of the year, this should be limited to 4dB for sites designated for bird features. This is particularly important for Thames Water, who have schemes which could impact SPAs/ Ramsar sites. Similarly, light pollution impacts have been limited to sites 500m away. Supporting habitat and flight lines for designated species should also be considered. For example, there are species such as bats which have a commuting corridor that exceeds 500m. The screening assessments should be reviewed to ensure that these matters have been considered.</p>	<p>Thank you for your comment. We can confirm that we have followed the recommended best practice guidance for assessing these factors as part of an HRA; we have reviewed our HRA report (Appendix C) to make this more explicit in terms of the aspects of this guidance that we have considered and the results of these considerations in terms of potential option impact.</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>



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<p>Natural England is pleased to see that the interest features of each Habitats site have been described well, and potential impacts of operation and construction to environmental receptors have been explored in depth. However, Natural England expects assessments to have had regard to the relevant sites' conservation objectives and supplementary advice to the conservation objectives (SACOs) where these exist. For Ramsar sites the overlapping SACOs and/or favourable condition tables should be used as a proxy. It is not clear how much these documents have supported the assessments.</p>	<p>Thank you for your comment. We can confirm that we have used the supporting documents you refer to in preparing our assessments for our draft plan. We have reviewed our HRA report to make this clearer in terms of methodology description, and have provided our HRA assessment sheets alongside our revised draft WRMP24 HRA report to provide further information on how these documents have informed our assessments and the results of these.</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>· Many of the options are in infancy stages of development, so it is understandable that there is uncertainty around the design and therefore the impact of the projects on sensitive environmental receptors, such as features of Habitats sites. However, where there is a potential impact pathway these options should be screened for likely significant effect (LSE), regardless of uncertainty about final design. It is inappropriate to simply conclude no LSE when there is such a high level of uncertainty whilst relying on 'down the line' assessments. Criteria for accepting 'down the line' assessment are included in Annex 2, Section 2.1. Where there are potential significant risks, the HRA should set out the steps required to resolve the uncertainty, and the timescales over which those steps will be addressed.</p>	<p>Thank you for your comment. We have added further commentary to the HRA report for our revised draft plan to more thoroughly explain as to why we have concluded at the screening stage that an option will not have Likely Significant Effects on a designated site. We have also reviewed to ensure that where further data could improve assessments, we have proposed activities to achieve this and a timeline for these.</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>As a donor company of bulk supply to various New Appointment and Variations (NAVs), Thames Water must ensure the relevant environmental assessments for these transfers have been undertaken, in relation to the bulk transfer and the supply abstractions. The HRA must be updated accordingly if any environmental impacts are identified from these sources or transfers. This applies to any new options, or existing options where there has been material change. This includes cumulative effects and in-combination effects.</p>	<p>Due to the amalgamated nature of our supply system, assessment of the environmental impact associated with the NAVs in our supply area is already covered off by the environmental assessments we carry out as standard for our abstractions. We have carried out assessments within the WRMP for any new transfers proposed as part of the draft and revised draft plan.</p>	<p>No change needed, for the reasons set out in our consideration.</p>
<p>Monitoring requirements have not been included within the HRA. Thames Water should seek to address information gaps where they are causing uncertainty within the assessment. Where options require mitigation, a monitoring plan must be included to determine whether the actions proposed are effective.</p>	<p>Where mitigation has been identified as being required in our revised draft plan, we have included monitoring requirements for these as far as is feasible with respect to option maturity.</p>	<p>Please see rdWRMP24 Appendix C which have been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>NE is pleased that Thames Water have included an in-combination assessment.</p> <ul style="list-style-type: none">o The expected types of plan and projects have been included.o NE would welcome clarification of the methodology to screen in plans and projects. "A 2km buffer was applied to the BVP Options and other plans to be considered for possible cumulative effects evaluation." The approach is plan/ project-centric and may not consider designated sites which have numerous pressures from plans/ projects which do not overlap within 2km. This is similar to in-combination within the SEA.	<p>Thank you for your response. We appreciate the point that is being made regarding including potential cumulative effects brought about by projects or plans beyond the 2km buffer. We have reviewed and consider that including DCOs and other water company WRMPs and Drought Plans beyond this 2km buffer will enable us to capture the most likely sources of relevant impacts in an efficient way. We have actioned this within our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix C which have been updated as described in our consideration, in response to this representation.</p>



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<p>SEW to Guildford</p> <ul style="list-style-type: none"> · Thames Water have concluded that “potential adverse effects may be observed upon Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC after mitigation is applied during the periods of construction and operation of this option due to potential changes to the extent and distribution of qualifying bird species, the structure and function of qualifying factors, and the supporting processes on which qualifying species rely”. This contrasts with what is detailed in section 4.3.2.2, where Thames Water suggest that “given the size of the Designated Site and the fact that the pipeline only affects a very small proportion of the site no adverse effects to the site integrity are expected if all mitigation measures proposed are in place.” There are a few important things to note: <ul style="list-style-type: none"> o The statements above are contradictory. Thames Water should review the HRA and ensure the risks to these sites are summarised correctly. 	<p>Thank you for your response. Text regarding adverse effects for this option as you have described was present in error in a version of our environmental reports produced prior to publication of our WRMP, but was corrected in the version of the report which forms part of our published dWRMP24. We are sorry for the confusion caused by having distributed reports prior to publication of our draft plan.</p> <p>The Appropriate Assessment (AA) for this option was subsequently reviewed and updated and a meeting was held with Natural England to discuss the option. The AA now concludes that ‘Adverse effects identified during the construction phase of this option on Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC are considered possible to mitigate if the recommendations in the Thames dWRMP24 HRA Report (November 2022) and those stated in the subsequent SEW to Guildford AA Review Technical Note (to be published as part of our revised draft plan) are adopted in full (see comment below for a description of this mitigation).</p> <p>It is considered that localised effects identified could also be mitigated, however, the following are proposed to provide additional certainty and tailor mitigation measures:</p> <ul style="list-style-type: none"> • Habitat surveys (in relation with Thursley, Ash, Pirbright and Chobham SAC) and bird surveys (in relation to Thames Basin Heaths SPA) are proposed prior to work commencing to identify the presence of functionally linked habitat and to allow the refinement of the mitigation measures. 	<p>Please see rdWRMP24 Appendix C for the updated assessment for this option.</p>



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	<ul style="list-style-type: none">• Where habitat loss and/or damage occurs, despite measures to avoid or minimise this, the reinstatement of habitat will be carried out once the works are concluded. <p>No adverse effects on the sites' integrity are expected if the proposed mitigation measures are implemented.</p>	



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>o Mitigation plans are not likely to be well-developed due to the option being timetabled for 2049/50. At present only breeding season avoidance is included. Natural England would welcome further detail about the mitigation proposed.</p>	<p>Further mitigation measures have been set out in the SEW to Guildford AA Review Technical note (to be published as part of our revised draft plan) including:</p> <ul style="list-style-type: none"> • The project-level HRA will be used to inform project design • Micro siting at the project design stage will maximise the distance separating the SPA/SAC and any asset within the relevant SSSI Impact Risk Zone • Where the project-level HRA identifies significant effects, the project design will prioritise the best available construction methods for preventing or minimising environmental impacts, with the project only proceeding if these effects can be mitigated effectively • The project’s Construction Environment Management Plan (CEMP) will detail the mitigation measures necessary to safeguard the SPA/SAC in accordance with the Natural England’s targets set out in ‘Supplementary advice on conserving and restoring site features’. Such safeguards will be secured by a pre-commencement planning condition and adaptive management measures within the CEMP. • Potentially damaging activities (i.e. operations requiring Natural England consent) will not take place in or near the SPA/SAC unless a habitat protection and restoration plan is secured by a pre-commencement planning condition. • Potentially disturbing activities identified in the CEMP will not take place in the relevant SSSI Impact Risk Zone during breeding period (February to September inclusive). • Potentially disturbing activities identified in the CEMP will not take place in the relevant SSSI Impact Risk during severe winter weather if baseline surveys have 	<p>Please see rdWRMP24 Appendix C for the updated mitigation information for this option.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
	identified that suitable Dartford warbler habitat is present.	



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>o It is noted that further studies are required to address uncertainty in the assessment, though no monitoring or timeline has been suggested. A monitoring plan is unlikely to have been developed due to the timing of the option, however, it would be beneficial for Thames Water to consider key information gaps and how/ when these will be addressed. Moreover, monitoring should link to proposed mitigation to determine whether measures have been successful.</p>	<p>The appropriate assessment for this option has been updated within our revised draft plan HRA report (Appendix AA) to include actions to be addressed during more detailed design stages, and to suggest any monitoring at this stage (monitoring will need to be developed and refined based on findings of further studies as outlined in the comments and responses below).</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>
<p>· Similarly, there seems to be mis-alignment between outcomes reported in the HRA and SEA document. The SEA summary suggests that there is an adverse effect on integrity (AEOI) determined in AA stage, and also that there is a potential impact on groundwater. Within the HRA, no AEOI is determined due to mitigation measures preventing impacts on birds. The WFD assessment (level 2) has concluded no impacts, though based on the information presented there does seem to be a probable link between groundwater and habitats. Natural England would welcome clarification on this matter.</p>	<p>The SEA findings for this option with our draft plan were based on a previous (draft) pre-publication version of our HRA report. These have now been updated in line with the SEW to Guildford AA Review Technical note outcomes (published as part of our revised draft plan) and the WFD Level 2 assessment for this option within our revised draft plan to ensure that the assessment for this option is up to date and consistent.</p>	<p>Please see rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>



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<p>· In relation to SEW to Guildford option, it is understood that Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bogs Ramsar Site have been screened out at stage 1 due to distance from the construction site (5 and 7km respectively), though Thames Basin Heaths SPA has been screened in. However, there is a possibility that the birds use the network of sites and therefore could be impacted. Further investigation on the use of functionally linked habitat by qualifying species is also recommended to assess potential effects in more detail and determine more targeted mitigation measures. A detailed review of the baseline ecological data is also recommended to determine further effects on these Designated Site qualifying features and reduce uncertainty.</p>	<p>Further investigation on the use of functionally linked habitat by qualifying species for the Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bogs Ramsar Site has been included in the planned further work within the appropriate assessment for this option in our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>
<p>· It is understood that further investigation into protected sites features will help to determine the route of the pipeline for this option in order to avoid functionally linked habitat. Natural England welcomes this approach. However, at present there is not enough information to determine no LSE based on size of the site alone. The WRMP24 tables show that this option is expected to come in use in 2049/50 earliest, so there is time to explore this further.</p>	<p>As suggested in your response, there is time to investigate the use of functionally linked habitat by qualifying species and provide more confidence in the appropriate assessment outcomes for this option. This has been included in the proposed next steps within the appropriate assessment for this option in our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>



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<p>T2ST Culham to Speen transfer option: · Unless there has been no material changes in context or condition of the site, it is not appropriate to rely on a screening conducted in 2019 for the sites. There was a condition assessment of River Lambourn SSSI in 2019, so depending on when in the year the stage 1 screening took place, this information may have been missed. Thames Water should confirm whether this assessment was taken into account.</p>	<p>Thank you for your comment. As stated in Appendix C of our draft plan, we reviewed the screening carried out in 2019 after 2019 in preparation for our draft plan, with results as stated in that report.</p>	<p>No change for reasons set out in consideration.</p>
<p>· Given this option is expected to be in use in 2039/40, Natural England would expect a relatively high degree of certainty in plans and appropriate assessment. However, the mitigation measures presented are not specific enough to remove the impacts with certainty.</p>	<p>Thank you for your comment. We consider that the level of assessment carried out is appropriate to the strategic nature of the plan, the planning stage of the option and the SRO supplying it, and when in the plan period this option is chosen. The option and environmental appraisal of this option has been further developed between our draft and revised draft plan and the results used to inform our environmental assessments.</p>	<p>Please see rdWRMP24 Appendices B, C, D which have been updated as described in our consideration, in response to this representation.</p>
<p>· It is not clear why Thames Water have concluded that an in-combination assessment is not required, though there is an AEOI on Kennet and Lambourn Floodplain SAC pre-mitigation.</p>	<p>In our draft plan we have included options within our in-combination assessment where low and localised effects cannot be ruled out even if all mitigation measures are implemented. This is not the case for this option, i.e. no effects are expected if all mitigation is implemented, which is why this option has not been included in our in-combination assessment for the draft plan.</p>	<p>No change - commentary provided.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>TWRM extension - Hampton to Battersea Option: · The locations of shafts have not been detailed for Hampton to Battersea Option, though it is noted in section 7.2 that they will occur within the Richmond Park SAC and Wimbledon Common SAC. Thames Water should determine where the most sensitive areas of the designated sites are and select sites which avoid them. Until this occurs, no AEOI should not be concluded with certainty.</p>	<p>Thank you for your comment. We undertook work at WRMP19 to identify an optimal route for this option, including shaft locations. This information has been used to update our environmental assessments for this option within our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix B, C, D which have been updated as described in our consideration, in response to this representation.</p>
<p>· At this stage, the loss of habitat is being mitigated by “reinstatement” once the construction is complete, opportunities for habitat improvement on site will be investigated.</p> <ul style="list-style-type: none"> o This may not mitigate the impacts on populations of Stag Beetles. o Reinstating the heathlands post construction may take numerous years. o Habitat improvement should be included within the plan before effects occur. 	<p>Thank you for your comment. As at WRMP19, we consider that, based on the proposed location for this option, that impacts on local populations of stag beetles are likely to be both very low and limited in terms of duration. At WRMP19 we identified mitigation actions for these impacts suitable to avoid these - these are (taken from WRMP19 HRA report):</p> <p>Prevent damage to sensitive vegetation where possible, particularly woody vegetation (especially decaying timber, stumps and root stocks where larvae may be present).</p> <p>Avoid construction works during May- August to avoid the period when adults emerge and are active to prevent killing individuals that may fly/crawl in to the works area.</p> <p>Liaise with Richmond Park SAC’s ecology team to ensure they are satisfied with the mitigation proposed and whether they wish to supervise it.</p> <p>No impacts on heath habitats are anticipated as a</p>	<p>Please see rdWRMP24 Appendices B and C which have been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
	<p>result of this option. We have updated our revised draft WRMP24 HRA to reflect this assessment information.</p>	
<p>· In regard to the comment "given the location of the site, adjacent to the A3 it is not known if increased levels above the baseline will be significant." Future monitoring should include efforts to understand the impacts of the works on air pollution and deposition onto the heaths.</p>	<p>As part of our WRMP19 HRA for this option, we identified that significant air quality impacts are not anticipated for this option element because the commonly applied threshold for potential air quality impacts of 1000 AADT or 200 HGV movements per day (within 200m of a designated site) will not be exceeded. We have updated our revised draft WRMP24 HRA to reflect this assessment information.</p>	<p>Please see rdWRMP24 Appendices B and C which have been updated as described in our consideration, in response to this representation.</p>



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<p>· Given this option is expected to be in use 2039/40, Natural England would expect a relatively high degree of certainty in plans and appropriate assessment. However, the mitigation measures presented are not specific enough to alleviate the impacts with certainty.</p>	<p>Thank you for your comment. We have updated our rdWRMP24 HRA report to include further details regarding mitigation measures and next steps regarding any further studies required.</p>	<p>Please see rdWRMP24 Appendices B and C which have been updated as described in our consideration, in response to this representation.</p>
<p>Kempton 150 Construction Option: · This option potentially has an AEOI on South West London Waterbodies SPA/ Ramsar without mitigation, though the details are not included due to “HRA AA Stage 2 was carried out for this Option in April 2020 where specific mitigations in relation to its implementation (construction and operation phases) upon the Designated Sites scoped in were outlined.” The assessment and proposed mitigation measures should be included.</p>	<p>Thank you for your comment. We have updated our rdWRMP24 HRA report to include full assessment details for this option.</p>	<p>Please see rdWRMP24 Appendices B and C which have been updated as described in our consideration, in response to this representation.</p>
<p>SWOX to SWA: · Until there is an investigation into the hydrological connectivity between Cothill Fen SAC and the option's footprint, as well as further surveys to determine functional habitat, it is not possible to conclude no AEOI with certainty, based on the generic mitigation proposed.</p>	<p>Cothill Fen SAC is approx. 0.05km from the pipeline route (including anticipated construction area) at its closest point and does not cross any waterbodies associated with the SAC. Within the assessment for this option for the draft plan, we have proposed further investigations/next steps to further develop our understanding of impacts associated with this option.. This option has not been selected in our rdWRMP24.</p>	<p>No change, as option has not been selected in revised draft plan.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>· There is contradiction in the outcome of the HRA assessment for SWOX to SWA option. "Significant impacts on Cothill Fen SAC and Oxford Meadows SAC are not considered to be fully mitigatable due to the proximity of the scheme to sites" is shortly followed by "HRA Appropriate Assessment was undertaken, which concluded that, with adherence to the proposed mitigation measures, the works associated with the option are not expected to have any significant adverse effects on the overall integrity of the Designated Sites and their features during the construction and operation phases." The HRA needs to be reviewed to remove such inconsistencies. Conclusions of no AEOI need to be supported by robust justification.</p>	<p>Thank you for your response. This issue was present in a version of our environmental reports produced prior to publication of our WRMP, but was corrected in the version of the report which forms part of our published dWRMP24. We are sorry for the confusion caused by having distributed reports prior to publication of our draft plan.</p> <p>However, we note your comment above about functionally linked habitat and potential for effects which we have set out as proposed next steps within the HRA report for our revised draft plan (Appendix C).</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>
<p>· Similarly, there's conflict in the conclusions for this option between the SEA and HRA. The former suggests that significant impacts on Cothill Fen SAC and Oxford Meadows SAC are not considered to be fully mitigatable due to the proximity of the scheme to sites. In contrast, The HRA concludes that with adherence to the proposed mitigation measures, the works associated with the option are not expected to have any significant adverse effects.</p>	<p>Thank you for your response. This issue has been caused by a previous version of our HRA report being used to inform the summarised option assessment results within the SEA report.</p> <p>We have reviewed and updated our rdWRMP24 SEA report to ensure that the assessment results are consistent between the environmental reports for our revised draft plan.</p>	<p>Please see rdWRMP24 Appendices B and C which has been updated as described in our consideration, in response to this representation.</p>



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<p>Moulsford: · There does not seem to be inclusion of any hydrological modelling to determine drawdown impacts on surrounding habitats. It is therefore unclear whether any groundwater-dependent SSSIs or priority habitats are at risk. This should be completed (and may have tangible impacts on the SEA). Given this option is expected to be in use in 2040, Natural England would welcome inclusion of plans to address this information gap.</p>	<p>Thank you for your comment. Within our rdWRMP24 HRA report we have included further details on actions to be addressed in relation to the assessment of this option during more detailed design stages.</p>	<p>Please see rdWRMP24 Appendices B and C which has been updated as described in our consideration, in response to this representation.</p>
<p>· There are no mitigation measures outlined for Severn to Thames Transfer (STT) Strategic Resource Option (SRO), despite it being mentioned that ideas were put forward. There are no details about next steps, including monitoring to inform assessments down the line. It is understood that this option is part of RAPID, and Natural England has engaged with Thames Water during gate 2 via the National Appraisal Unit (NAU). Natural England suggested LSE based on uncertainty regarding the potential impacts on migratory cues (chemical) for migratory species, including impacts to development and changes in species distributions, and this concern remains.</p>	<p>Thank you for your comment. Within our rdWRMP24 environmental assessment reports we have included further detail regarding the anticipated effects and proposed mitigation for the Severn to Thames Transfer.</p>	<p>Please see rdWRMP24 Appendices B, C and D which has been updated as described in our consideration, in response to this representation.</p>



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<p>Southfleet/Greenhithe (new WTW): · The HRA screening assessment has determined no LSE for Thames Estuary and Marshes Ramsar/ SPA. The main concern is the impact of groundwater abstraction on drawdown, and impact on flow into the estuary. It is understood that, depending on the reduction on flows, the risk of a significant impact on the estuary and the features supported by the habitat is low due to volume of abstraction relative to the overall flows to the Thames Estuary and the distance upstream from the designated sites. However, Natural England would welcome completion of the investigations/ modelling proposed to address uncertainty around the drawdown estimates.</p>	<p>Thank you for your comment. Within our rdWRMP24 environmental assessment reports we have included further details on actions in relation to the assessment of the option during more detailed design stages.</p>	<p>Please see rdWRMP24 Appendices B, C and D which has been updated as described in our consideration, in response to this representation.</p>
<p>ASR Horton Kirby: · This option has been listed in section 15 as not requiring an appropriate assessment. However, table A.27 shows that the screening assessment has identified an LSE for Thames Estuary & Marshes Ramsar. It is not clear why Thames Estuary & Marshes SPA has not been screened. Thames Water must complete an appropriate assessment of this option.</p>	<p>Thank you for your response. The Thames Estuary & Marshes SPA should also have been included in the Test of Likely Significance (ToLS), this was omitted in error and has been updated within our revised draft plan HRA report (Appendix C). The need for an appropriate assessment (based on the updated ToLS) has also been reviewed and commentary regarding this updated in the same report.</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>



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<p>Dukes Cut to Farmoor (non-BVP option): · Thames Water considered mitigation during the stage 1 screening for this option. As per People over Wind4, April 2018 Court of Justice of the European Union (CJEU) ruling, the stage 1 screening assessment of an HRA cannot include mitigation. The judgement clarified that when deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures. Thames Water must revisit this assessment.</p>	<p>Thank you for your response. We can confirm that mitigation has not been taken into account when determining LSE for any option within our draft plan, and any mention of mitigation has been removed from the screening content for this option within our HRA report (Appendix C) of our revised draft plan.</p> <p>The ToLS content included in Table A.32 in the HRA Report for our draft plan is incorrect, and has been corrected for our revised draft plan. During screening carried out as part of the draft plan, LSE was identified for the Oxford Meadows SAC and an Appropriate Assessment was undertaken, with the result of no adverse effects presented in Chapter 16 of the HRA Report for the draft plan.</p>	<p>Please see rdWRMP24 Appendix C which has been updated as described in our consideration, in response to this representation.</p>
<p>1.2 Strategic Environmental Assessment (SEA): WRMPs are prepared for water management and set the framework for future development consents of projects listed in Annex II of the EIA Directive, including groundwater abstractions and impoundments. As such, WRMPs meet the requirements set out in the SEA Regulations requiring SEA to be completed. Natural England's views on the documents submitted as part of the SEA for this dWRMP are as follows:</p>	<p>N/A</p>	<p>N/A</p>



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<ul style="list-style-type: none"> Natural England is happy with the overall approach to assessment of options in the SEA, which included an assessment of in-combination and cumulative effects. WRSE have incorporated the SEA results into its modelling for the regional plan, which in turn selected the choice of options. However, there are still options in the Best Value Plan which are potentially environmentally-damaging. 	<p>We note your concern that some options in our draft plan may have potentially harmful effects on the environment.</p>	<p>Please see below.</p>
<ul style="list-style-type: none"> In a letter dated 09 June 2022, Thames Water consulted Natural England on their approach to Strategic Environmental Assessment for WRMP24, in which they proposed to use the SEA Scoping provided by WRSE. Natural England agreed that this was acceptable as long as the scoping document had been updated to take account of Natural England’s earlier comments on it, and that Thames Water update the baseline information to reflect the local circumstances. It is not clear whether this has been done, due to the screening stage not being included within the document. 	<p>Thank you for your response. We can confirm that the scoping document for WRSE was updated to take into account NE's previous comments on this - this was updated via the Environmental Report for the regional plan and this was used to prepare our draft plan. We have included details of the scoping for our SEA within Appendix B of our draft plan.</p> <p>Our approach to describing our baseline for the SEA of our draft plan was to present the WRSE baseline supplemented with baseline information specific to the Thames Water area on a topic by topic basis. We have taken the same approach for our revised draft plan, but have reviewed to ensure that the local baseline information for our study area is clearly presented.</p>	<p>Please see rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>



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<p>Within the discussion of environmental assessments for each of the options (section 4.7), there is no commentary for each of the objectives within the SEA. It is not clear whether this is due to Thames Water omitting this information, or whether no impacts have been identified in the SEA. As a result, impacts are not linked directly to any monitoring and mitigation actions. Natural England advises that this should be corrected before the final plan is published, as at present it is possible that there are impacts which will not be appropriately avoided, mitigated and/ or monitored. This is particularly pertinent for the following options, where there are potential impacts on protected sites/ species/ habitat, identified in brackets:</p>	<p>Thank you for your response. The SEA and HRA reports for the draft plan summarise the effects of options and it is recognised that the reports themselves may not have provided a comprehensive enough description of assessment outputs to suit all readers without also referring to the assessment result spreadsheets themselves. As part of our revised draft plan we have provided all the assessment spreadsheets for each option as an appendix. The assessment summaries provided in the reports have also been reviewed and expanded to bring out key effects and provide a more holistic overview of the option effects.</p>	<p>Please see rdWRMP24 Appendix B and C which have been updated as described in our consideration, in response to this representation.</p>
<p>o South East Water to Guildford (Thursley, Ash and Chobham SAC; ancient woodland, good quality semi-improved grassland, calcareous grassland, and deciduous woodland)</p>	<p>See above.</p>	<p>See above.</p>
<p>o River Thames to Fobney Transfer Option (non-specified SSSI, Lousehill Copse LNR and McIlroy Park LNR; woodland and non-specified priority habitat)</p>	<p>See above.</p>	<p>See above.</p>
<p>o TWRM Extension – Hampton to Battersea Option (Richmond Park SSSI/SAC/NNR; non-specified Groundwater Dependant Terrestrial Ecosystem (GWDTE) and Priority Habitat)</p>	<p>See above.</p>	<p>See above.</p>



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o Kempton 100 and 150 Construction Options - SRO (non-specified SSSI, Kempton Park Reservoirs SSSI, Kempton Nature Reserves LNR, and the South West London Waterbodies SPA/ Ramsar; deciduous woodland Priority Habitat)	See above.	See above.
o SWOX to SWA Option (Wood and Shotover Hill SSSI, Wytham Woods SSSI, Sidling's Copse and College Pond SSSI, Wytham Ditches and Flushes SSSI, Holton Wood SSSI, Lyehill Quarry SSSI, Cassington Meadows SSSI, Cothill Fen SSSI/ SAC; Frilford Heath, Ponds and Fens SSSI, Oxford Meadows SAC)	See above.	See above.
o TLT extension from Lockwood PS to King George V Reservoir intake (Lee Valley SPA/Ramsar birds)	See above.	See above.
o T2ST Culham to Speen (Kennet & Lambourn Floodplain SAC)	See above.	See above.
o Thames to Affinity Transfer (T2AT) (Chingford Reservoir SSSI, four non- specified Habitats Sites)	See above.	See above.
o South East Strategic Reservoir Option (SESRO) (Barrow Farm Fen SSSI/ GWDTE, Frilford Heath, Ponds and Fens SSSI/ GWDTE, Cothill Fen SSSI/ GWDTE, Culham Brake SSSI; non-specified priority habitats and woodland; Cothill Fen SAC, Little Wittenham SAC, and Hackpen Hill SAC)	See above.	See above.



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<p>o Wessex Water to SWOX (Flaxlands), Groundwater Addington and Southfleet/ Greenhithe (new WTW), Dapdune Licence Disaggregation, Britwell Removal of Constraints, Merton Recommissioning, Merton MAR, Thames Valley ASR (none listed, though minor negative impact on biodiversity implied)</p>	<p>See above.</p>	<p>See above.</p>
<p>o Colne Integrated Catchment Management Scheme (none listed, though major negative biodiversity score during construction)</p>	<p>Thank you for your comment. We have considered a range of catchment options across our supply area, and have ascertained those nature-based solutions which we can be confident will deliver supply benefits. The draft regional plan selected a portfolio of catchment options for the Colne catchment; while we do support these measures we did not feel it appropriate for the draft plan to include this portfolio for Thames Water's plan as it was not seen to provide any deployable output benefit to the Thames Water area; it does provide this benefit to Affinity Water's supply area. On this basis, we did not include this option within our published draft plan.</p> <p>As part of our work to support the development of nature based solutions for water resources planning, we are working with WRSE to deliver a regional WINEP (Water Industry National Environment Programme) investigation to further understand the benefits of these schemes (by delivering pilot studies) and identify opportunities regionally for catchment management schemes to improve ecosystem resilience where these will deliver the biggest benefit. For the draft plan, we assessed each of the portfolios of catchment options against SEA only to inform the environmental metrics</p>	<p>No change made as explained within consideration; this option was not included in our published draft plan.</p>



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	<p>used for modelling, due to the reduced information for these options. We will look to expand this work by improving the detail of the SEA assessments, and also to cover more assessment types beyond SEA as we gain more knowledge about these options over the next planning cycle.</p>	
<p>o ASR Horton Kirby, Mortimer Disused Source (Recommission) (none listed, though minor negative implied – see section 1.2.1 for further detail).</p>	<p>See above.</p>	<p>See above.</p>
<p>It is positive that a variable Zol was used for each topic and adjusted per site depending on potential pathways for interaction.</p>	<p>Thank you for your comment.</p>	<p>None required or suggested by response.</p>
<p>Though the summary table shows what each option has scored for each objective, the summary of each impact is not thoroughly explored within section 4.7.</p>	<p>Thank you for your response. The assessment summaries provided in the SEA report for the revised draft plan have been reviewed and expanded to bring out key effects and provide a more holistic overview of the option effects. Assessment sheets are included in</p>	<p>Please see rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>



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	the SEA Appendix as a zip file to provide further option-level detail. Effects at the plan level are included under each SEA objective.	
Where a light touch approach is suggested for schemes which will be in use post 2050, this seems appropriate. This is because many plans are in their early stages of development and do not have the information required to conduct a detailed assessment. However, Natural England recommends that Thames Water should highlight areas where monitoring would improve the baseline.	Thank you for your response. Within the environmental reports for our revised draft plan we have highlighted where monitoring could improve our understanding of the environmental baseline for options selected in our plan from 2050.	Please see rdWRMP24 Appendix B, C, D which have been updated as described in our consideration, in response to this representation.
In table 4.1, which describes scoring methodology for the SEA, where high value receptors such as protected sites are negatively impacted the assessment should identify effects as major adverse.	We can confirm that the SEA methodology we have followed for our plan aligns with your comment. We have updated our narrative within the plan to make this point clearer.	Please see rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.



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<p>Cumulative impact assessment: · Thames Water note that the “cumulative effects of the BVP on Natura 2000 sites will be assessed within the next HRA update. No further cumulative effects during operation of the BVP have been identified.” This comment has been made in reference to operational impacts on the biodiversity, flora and fauna SEA objective. Natural England advises that Thames Water should ensure that they have completed an assessment of operational impacts on Habitats Sites in the SEA of the final plan. Natural England would also welcome clarification that Thames Water have considered operational impacts on other sensitive environmental receptors explored in the biodiversity objective (e.g. SSSIs, protected sites and species).</p>	<p>Thank you for your response. This issue was present in a version of our environmental reports produced prior to publication of our WRMP, but was solved in the version of the report which forms part of our published dWRMP24. We are sorry for the confusion caused by having distributed reports prior to publication of our draft plan.</p> <p>We can confirm that within the draft plan SEA we have considered operational impacts on other sensitive environmental receptors explored in the biodiversity objective. This has been made clearer in our revised draft plan with the inclusion of the individual SEA assessment sheets for each option in our plan as an annex to our SEA report.</p>	<p>Please see rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>
<p>Where there are cumulative effects during construction identified for Thames Water Best Value plan (BVP) options, there are no details about the pathway, magnitude or nature of the impacts. For example:</p>	<p>Thank you for your response. Within our revised draft plan SEA and HRA, further detail has been provided on cumulative construction effects to differentiate the magnitude and nature of effects and help to develop appropriate mitigation measures. When assessing cumulative construction effects for the draft plan, we also considered the timing of construction to identify where option construction periods may overlap. This has been made clearer in the methodology.</p>	<p>Please see rdWRMP24 Appendix B and C which have been updated as described in our consideration, in response to this representation.</p>



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<p>o Thames Water have identified that Cothill Fen SAC may be affected by SWOX to SWA and Abingdon to Farmoor Reservoir options. There is no detail about what kind of impacts may occur, or any mention of mitigation.</p>	<p>The SWOX to SWA 'option' is no longer selected, as this transfer is a baseline transfer.</p>	<p>Please see rdWRMP24 Appendix B, C, D, BB which have been updated as described in our consideration, in response to this representation.</p>
<p>Where cumulative impacts have been identified, Thames Water should include mitigation measures to avoid effects on sensitive environmental receptors. For example:</p>	<p>Thank you for your response. Within our revised draft plan environmental reports we have included further detail on the nature of any anticipated cumulative impacts and proposed mitigation measures for these, or proposed next steps where this is needed to inform understanding of impacts and design of mitigation.</p>	<p>Please see rdWRMP24 Appendix B, C, D, BB which have been updated as described in our consideration, in response to this representation.</p>
<p>o TLT extension from Lockwood PS to King George V Reservoir intake construction could overlap with ALL.WAS.LON6 (waste allocation) and disturb bird features of Chingford Reservoirs SSSI.</p>	<p>See above</p>	<p>See above</p>
<p>o STT and T2ST may have cumulative impacts from construction on Barrow Farm Fen SSSI, and Frilford Heath, Ponds and Fens SSSI.</p>	<p>See above</p>	<p>See above</p>
<p>· Proposed mitigation measures for impacts of abstraction from rivers but not groundwater is mentioned within table 8.1. As aforementioned, please note that mitigation cannot be accounted for in stage one HRA.</p>	<p>Thank you for your response. Table 8.1 refers to methodology followed for the SEA of our draft plan rather than our HRA, and so we consider it to be appropriate.</p>	<p>No change needed, commentary provided.</p>
<p>Natural England recommends that Thames Water include post-mitigation scoring to identify whether proposed mitigation alleviates issues identified within the SEA,</p>	<p>We can confirm that post-mitigation scoring is included in the SEA assessment of options in preparing the WRSE and TW plans. These post-mitigation scores have been used in the WRSE investment modelling to develop the draft and revised draft best value plan. Within our rdWRMP24 SEA report (Appendix B), we</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>



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	<p>have, where feasible, included further detail on the anticipated effectiveness of mitigation over and above that included in the post-mitigation scoring used in the investment modelling for the revised draft plan.</p>	
<p>It is not clear whether Thames Water have given consideration to the NERC duty (as strengthened by the Environment Act 2021) to further the conservation objectives in the SEA. Thames Water should include long term restoration of Habitats Sites in line with statutory duties (see Annex 2). Water companies should check and work towards targets in place under the Government's Environmental Improvement Plan, now published under the Environment Act 2021.</p>	<p>Thank you for your response. We very much hold the long term improvement of habitats as a goal to be achieved where feasible as part of our activities.</p> <p>This includes working to increase the biodiversity across our sites through improving the condition of existing habitats by changing the management regimes of grassland and creating new habitats including wetlands, woodlands and hedgerows.</p> <p>For the WRMP specifically we are committed to achieve a 10%+ biodiversity gain across our plan which will help the Nature Recovery Networks in our region to improve. Further details on our strategy to deliver this are available in our rdWRMP24 Appendix AA.</p>	<p>See rdWRMP24 Appendix AA.</p>
<p>Thames Water have not included a detailed monitoring plan which goes beyond general suggestions. A timetabled plan designed to remove evidence gaps during this plan period should be included. This should target options which will be developed before 2040.</p>	<p>Thank you for your response. The mitigation and monitoring sections in all of the environmental reports accompanying the revised draft plan have been updated to make them more detailed and option specific. Mitigation and monitoring has been clearly linked to specific option effects, gaps and uncertainty. A programme of work for further studies and investigations to fill any informaton gaps has also been included, setting out actions and a timetable.</p>	<p>See rdWRMP24 Appendix B, C, D, AA, BB.</p>



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<p>· In reference to monitoring, habitat mapping would be beneficial to understand whether habitat connectivity has been impacted.</p>	<p>Thank you for your response. We have taken on board your comment regarding habitat mapping, which we understand to refer to the option development stage as a result of discussion with Natural England in April '23. We are therefore taking this forward as an action for WRMP29.</p>	<p>N/A - general comment</p>
<p>It is unclear whether proposed monitoring of ecological sites includes priority habitats and species. Natural England advises that this should be included where potential impact pathways have been identified.</p>	<p>Thank you for your response. Within our revised draft plan we have ensured that we have included priority habitats and species within our monitoring plans across our SEA and HRA.</p>	<p>See rdWRMP24 Appendix B, C which has been updated as described in our consideration, in response to this representation.</p>
<p>1.2.1 SSSIs in the SEA: · The quality of information provided within the SSSI assessment is variable. In some cases, there is a good level of detail included, but in others the conclusions are less clear, with names of sites being omitted in some instances. For example, River Thames to Fobney Transfer Option does not have the impacted SSSI listed. Thames Water should rectify this.</p>	<p>Thank you for your response. Across the SEA for our revised draft plan, we have reviewed the level of detail to which we have included assessment of impacts on SSSIs. The omission specifically referred to in regards to the Thames to Fobney option has been rectified within our rdWRMP24 SEA.</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>
<p>SSSIs in the SEA: When assessing impact, designated features, condition and threats should be considered. This will enable Thames Water to understand their resilience to any potential impacts of reduced water levels through abstraction or drought, for example.</p>	<p>Thank you for your response. Within our draft plan, we have considered SSSI condition, and we have updated our environmental assessments to also consider designated features and threats for our revised draft plan.</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>



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<p>The dWRMP doesn't include proposals to enhance SSSI condition or increase sites' resilience to changes in water availability. Thames Water should consider this in line with the company duties as set out in Annex 2.</p>	<p>Thank you for your response. We very much hold the long term improvement of habitats as a general goal to be achieved where feasible as part of our day to day activities.</p> <p>This includes working to increase the biodiversity across our sites including SSSI through improving the condition of existing habitats by changing the management regimes of grassland and creating new habitats including wetlands, woodlands and hedgerows. Around 99% of our SSSI land area is classified as 'favourable' (50.89%) or 'unfavourable recovering' by Natural England. We're working with Natural England and other specialists to understand how to further improve the condition of 'unfavourable recovering' areas. These can be a result of wider population trends rather than specific conditions on site.</p> <p>For the WRMP specifically we are committed to achieve a 10%+ biodiversity gain across our plan which will help the Nature Recovery Networks in our region to improve. Further details on our strategy to deliver this are available in our rdWRMP24 Appendix AA.</p>	<p>No change made as a result of this representation, however please see rdWRMP24 Appendix AA for BNG strategy</p>



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<p>Mitigation is included within Table H.1: WRMP19 Mitigation Register. Natural England presumes that this mitigation is still proposed within WRMP24, though this is not explicitly stated. Thames Water should ensure that the mitigation measures listed are still appropriate, given any contextual changes such as condition assessments or monitoring which has developed our understanding of protected sites. Where mitigation lacks detail, this is often due to schemes not being fully developed and occurring later in the plan (post-2035). However, for options highlighted in the previous section, this should be rectified.</p>	<p>Thank you for your response. Within our revised draft plan SEA we have removed Table H.1 to make things clearer for readers.</p> <p>The mitigation and monitoring sections in all of the environmental reports for the revised draft plan have also been updated to make them more detailed and option specific. Mitigation and monitoring has been clearly linked to specific option effects, gaps and uncertainty. A programme of work for further studies and investigations has been included to highlight assessment required during more detailed design stages and to inform the design of mitigation, setting out actions and a timetable.</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>
<p>Severn to Thames Transfer (STT) does not mention impacts on SSSIs or protected habitats/ species.</p>	<p>Thank you for your response. We have reviewed our environmental reports and included this detail for STT, from the published Gate 2 reports for this scheme, within our revised draft SEA and HRA.</p>	<p>See rdWRMP24 Appendix B and C which has been updated as described in our consideration, in response to this representation.</p>



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<p>In many cases there is no commentary on the impacts or lack of impacts on designated sites and/or priority habitats/ protected species. In such cases Natural England is unable to conclude whether we agree or disagree with the statements made regarding environmental impacts. Further detail about the assessment for each option should be added to support the scores in the summary SEA table. This is consistent with Natural England's advice during WRMP19, where we commented that some areas of the SEA required further work or clarification.</p>	<p>Thank you for your response. The SEA and HRA reports for the draft plan summarise the effects of options and it is recognised that this may not provide sufficient detail. As part of our revised draft plan we have provided all the assessment spreadsheets for each option as an appendix. The assessment summaries provided in the reports have also been reviewed and expanded to bring out key effects and provide a more holistic overview of the option effects.</p>	<p>See rdWRMP24 Appendix B and C which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>ASR Horton Kirby: · This option takes advantage of water surplus in Lower Greensand Aquifer. As explained in section 1.3, Horton Kirby has been highlighted in Section 5 Environmental Forecast document as an abstraction source that has previously had sustainability reductions and should be a priority in low and medium environmental destinations. Natural England questions the availability of “surplus water”, and the requests information on the assessment (e.g. modelling of drawdown). Though there are no SEA and HRA implications, the aquifer is an important source for water-dependent habitats and species.</p>	<p>Overall, we will always look to secure abstraction in places where we know the environmental impact of this is acceptable.</p> <p>The WFD assessment for this option has been reviewed to include further technical information on its intended operation to make our position on its sustainability clearer and more comprehensively justified, as well as making any risks clearer.</p> <p>The Level 2 WFD assessment identified potential risk of WFD deterioration (impact score 2) to the quantitative water balance test status. This is a result of the requirement to increase abstraction during wetter periods, to supply water to be injected into the ASR borehole. At this stage it is proposed that the water would come from the Bean Chalk groundwater source. This could lead to an effect on the water balance in the groundwater body (already at Poor status).</p> <p>Recommended next steps include scenario modelling. Mitigation may require restrictions or licence capping through use of HOF on the groundwater source, if deemed appropriate after further investigation.</p> <p>However, following further investigation and identification of appropriate mitigation measures, it is anticipated that the WFD non-compliance risk will be removed.</p>	<p>See rdWRMP24 Appendix D which has been updated as described in our consideration, in response to this representation.</p>



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NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>Mortimer Disused Source (Recommission): · Mortimer Disused Source (Recommission) abstracts from Aldermaston Bagshot Beds groundwater body. Given the water-dependent sites/ species linked to this waterbody, Natural England would welcome further assessment of the potential for impacts on:</p> <ul style="list-style-type: none">o Pamber Forest and Silchester Common SSSIo Decoy Pit, Pools & Woods SSSIo Ron Ward's Meadow with Tadley Pastures SSSIo Wasing Wood Ponds SSSIo West's Meadow, Aldermaston SSSI.	<p>Thank you for your response. For this option, abstraction is from the confined chalk aquifer which is separated from the surface water features in this area by a layer of London Clay. Groundwater levels at the SSSIs should not be affected. We have updated our WFD report for the revised draft plan (Appendix D) to provide this commentary for these sites.</p>	<p>Please see rdWRMP24 Appendix D which has been updated as described in our consideration, in response to this representation.</p>
<p>TLT extension from Lockwood PS to King George V Reservoir intake: · In relation to TWU_KGV_HI-TFR_KGV_ALL_lockwood ps-kgv_res, there are no details associated with this option, so it is difficult to ascertain whether the assessment is appropriate.</p>	<p>Thank you for your response. Within our revised draft plan SEA and HRA, further detail has been provided on this option.</p>	<p>See rdWRMP24 Appendix B and C which has been updated as described in our consideration, in response to this representation.</p>



<p>1.2.2 Protected landscapes in the SEA: · The SEA does not fully acknowledge the risks that SESRO poses to sensitive landscape features. The reservoir will significantly and permanently alter the landscape in which it is built and will impact the landscape features of the setting of the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The scheme presents opportunities for landscape improvements, and careful design will be essential to ensure local landscape character is not just protected, but also enhanced.</p>	<p>The environmental impacts of the proposals have been assessed as part of the Strategic Environmental Assessment (SEA) of the draft WRMP. This assessment allows SEA environmental metrics describing positive benefits and negative impacts to be generated, which is used to enable comparison with other options when deriving the best value plan. The more detailed environmental appraisal, which has been used to inform the SEA, forms part of our Gate 2 submission to RAPID and Supporting Documents B1 to B7 provide details of the environmental appraisal of the SESRO options, all of which are available on Thames Water's website (https://www.thameswater.co.uk/about-us/regulation/strategic-water-resource-solutions). Therefore, the potential environmental impacts have been taken into account in weighing up the pros and cons of the SESRO options compared to alternatives. We have subsequently met with Natural England and taken on board their comments on the sensitivity of the North Wessex Downs AONB, updating the analysis undertaken for RAPID Gate 2, which informs the SEA of the WRMP, such that the value of the North Wessex Downs Area of Outstanding Natural Beauty (AONB) is changed from high to very high, as requested by Natural England.</p> <p>This review has reaffirmed the conclusions of the SEA for the landscape objective; that SESRO potentially would lead to a major negative effect and the project will therefore require extensive landscape and visual mitigation. It should also be noted that the negative effect reported in the SEA for the landscape objective, for both construction and operation, is at the most negative end of the assessment scoring scale, e.g. major negative. Therefore, the SEA is considered to</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>
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	<p>accurately reflect the scale of the potential landscape impacts from SESRO. We have reviewed the revised draft WRMP24 SEA report to ensure that this is clear. This strategic level appraisal of impacts has been taken into account when deriving the best value plan, including the impacts on landscape and visual amenity from both local and regional viewpoints including the North Wessex Downs AONB.</p> <p>Furthermore, these findings are under the condition that essential mitigation illustrated on the Illustrative Environmental Masterplan (Gate 2 Technical Annex B7 SEA Appendix B, Figure 5-1) is incorporated into the design of the 150Mm³ option. Further measures proposed to mitigate potential landscape and visual effects during construction and operation are set out in Section 6.6 of Supporting Document B2, Environmental Appraisal Report (terrestrial).</p> <p>We have started to explore how some of the most significant impacts might be managed and mitigated when the scheme is designed, as part of our Gate 2 submission to RAPID. For example, section 3.4 of our main report to RAPID (and figure 3.1) explain some of the key landscape issues and how we have taken these into account in deriving an indicative landscape master plan for the 150 Mm³ SESRO option. We will continue to develop our thinking on these issues, in close liaison with the local community, Natural England and representatives from the AONB as the design of the scheme develops. Furthermore, any future promotion of one of the SESRO options would need to be subject to a formal Environmental Impact Assessment (EIA) and suitable mitigation identified and agreed with regulators before any consent was approved.</p>	
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NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.2.2 Protected landscapes in the SEA: The impact on specific AONBs were not explored within section 4.8 of Appendix B (SEA). Further detail on potential impacts of SESRO on the landscape, including proposed mitigation, should be included in the SEA.</p>	<p>We have previously met with Natural England and taken on board their comments on the sensitivity of the North Wessex Downs AONB, updating the analysis undertaken for RAPID Gate 2, which informs the SEA of the WRMP, such that the value of the North Wessex Downs Area of Outstanding Natural Beauty (AONB) is changed from high to very high, as requested by Natural England.</p> <p>This review has reaffirmed the conclusions of the SEA for the landscape objective; that SESRO potentially would lead to a major negative effect and the project will therefore require extensive landscape and visual mitigation. It should also be noted that the negative effect reported in the SEA for the landscape objective, for both construction and operation, is at the most negative end of the assessment scoring scale, e.g. major negative. Therefore, the SEA is considered to accurately reflect the scale of the potential landscape impacts from SESRO. We have reviewed the revised draft WRMP24 SEA report to ensure that this is clear.</p> <p>As part of our Gate 2 submission to RAPID, we have started to explore how some of the most significant impacts might be managed and mitigated when the scheme is designed. For example, section 3.4 of our main report to RAPID (and figure 3.1) explain some of the key landscape issues and how we have taken these into account in deriving an indicative landscape master plan for the 150 Mm3 SESRO option. We will continue to develop our thinking on these issues, in close liaison with the local community, Natural England and representatives from the AONB as the design of the</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
	<p>scheme develops. Furthermore, any future promotion of one of the SESRO options would need to be subject to a formal Environmental Impact Assessment (EIA) and suitable mitigation identified and agreed with regulators before any consent was approved.</p>	



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.2.3 Biodiversity in the SEA: · As aforementioned, it is not clear whether the WRMP and SEA has considered the public body duties under the NERC Act 2006, as strengthened by the Environment Act 2021 to “further the conservation and enhancement of biodiversity”, including restoration and enhancing a species population or habitat. It is understood that Thames Water are undertaking many positive projects to improve the environment, and in many cases will be increasing resilience of habitats/ species to climate change. Where relevant, Natural England encourages Thames Water to highlight these projects and link company activities.</p>	<p>Thank you for your response. We have reviewed our plan to ensure that within our revised draft we clearly communicate the action that we are taking as a company both now and in the future to enhance habitats that are important for nature, including increasing resilience of habitats/ species to climate change.</p>	<p>Please see rdWRMP24 Section 2 which has been updated as described in our consideration, in response to this representation.</p>
<p>1.2.3 Biodiversity in the SEA: Though there are catchment solutions within the WRMP, and these have been scored in the SEA, there is no commentary about the potential impacts.</p>	<p>Thank you for your response. Where catchment options have been included in our revised draft plan, we have endeavoured to further describe anticipated impacts under the SEA, as far as is feasible at this stage, noting that these options are currently less mature.</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>
<p>1.2.3 Biodiversity in the SEA: Thames Water have considered impacts of supply options on habitats and species of principal importance (also known as priority habitats and species), though the detail of potential impacts varies between schemes. See Section 1.2 for further detail at scheme level.</p>	<p>See below</p>	<p>See below</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.2.3 Biodiversity in the SEA: Similarly to other environmental receptors, Thames Water have not clearly explored monitoring and mitigation for priority habitats.</p>	<p>Thank you for your response. Within our revised draft plan we have ensured that we have included priority habitats and species within our mitigation and monitoring plans across our SEA, WFD and HRA. These were included in our assessments for draft plan, and we have since revised our mitigation and monitoring plans to ensure that these are explicitly included within these in the report.</p>	<p>See rdWRMP24 Appendix B, C and D which have been updated as described in our consideration, in response to this representation.</p>
<p>1.2.4 Species Recovery and Protected species: · With reference to WFD no deterioration, damaging abstractions have been prioritised for reduction or removal. However, it is not clear whether Thames Water have considered impacts of existing abstractions on protected species within this prioritisation.</p>	<p>Thank you for your response. Our no deterioration investigations to inform the need for reductions are triggered by changing compliance against WFD, as agreed with the Environment Agency. Whilst protected species are not considered explicitly in this process, protecting flow compliance will benefit all species including protected species. All of our abstractions were included in the Review of Consents, with actions implemented as appropriate. Please see our historical low flow investigations within Section 2 of our rdWRMP24.</p>	<p>Please see rdWRMP24 Section 2 for further details added to our content regarding our historic low flow investigations, in response to this representation.</p>
<p>1.2.4 Species Recovery and Protected species: Where Thames Water have concerns around the impacts of sustainability of existing supplies in relation to protected species, the water company should explore measures to reduce the risk of species extinction in line with the species' targets set out in Annex 2.</p>	<p>Thank you for your response. Our investigations to inform the need for reductions are triggered by a number of different factors, not just WFD compliance (e.g. presence of NERC habitats), and impacts on designated sites are investigated as standard as part of these. We have provided further detail on this within our revised draft plan, via an update to Section 2 of our rdWRMP24. As part of these investigations, where impacts are found, we as a matter of course undertake to find the most effective feasible solution to minimise these impacts as quickly as possible.</p>	<p>Please see rdWRMP24 Section 2 which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.2.4 Species Recovery and Protected species: Thames Water have not clearly explored monitoring and mitigation for protected species.</p>	<p>Thank you for your response. Within our revised draft plan we have identified species mitigation as part of the HRA.</p>	<p>See rdWRMP24 Appendix B, C and D</p>
<p>1.2.5. Climate change in the SEA: Biodiversity has not been considered within the SEA objective for climate change, though climate change has been considered within the biodiversity topic. "Will the option affect the capacity for priority habitats and species to move or adapt in response to climate change?" has been included as a question within the objectives. However, as the SEA does not include a narrative for each assessment question, it is unclear how this has been assessed or whether such positive impacts can be expected. Considering Thames Water operates in an area of the UK that is particularly vulnerable to climate change impacts, Natural England would welcome inclusion of detail around this objective.</p>	<p>Thank you for your response. The SEA and HRA reports for the draft plan summarise the effects of options and it is recognised that the reports themselves may not have provided a comprehensive enough description of assessment outputs to suit all readers without also referring to the assessment result spreadsheets themselves.. As part of our revised draft plan we have provided all the assessment spreadsheets for each option as an appendix, which include detail as to what has been considered in assessing against each objective. We consider that we have also provided further detail regarding this point within our Issues and Opportunities summary (Table 3) with our rdWRMP24 SEA report (Appendix B). The assessment summaries provided in the reports have also been reviewed and expanded to bring out key effects (including further narrative against this assessment question) and provide a more holistic overview of the option effects.</p>	<p>See rdWRMP24 Appendix B, C</p>
<p>1.2.5. Climate change in the SEA: It is not clear how the proposed mitigation measures within Table 8.1 of the SEA document link to climate change.</p>	<p>Thank you for your response. Within the SEA of our revised draft plan we have made a clearer link between our proposed mitigation measures and their anticipated impact on climate change risk.</p>	<p>See rdWRMP24 Appendix B which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.2.5. Climate change in the SEA: Thames Water have completed a separate document focusing on climate change. However, the focus is more on the impacts on supplies rather than the direct implications on the environment's needs going forward. The effects of climate change on environmental resilience to water company activities could be explored further in this document, which would feed into the SEA.</p>	<p>While we agree that climate change will have impacts on the environment's future needs, we do not agree that this technical Appendix should include the impact of climate change on the environment's needs.</p> <p>The first sentence of this Technical Appendix (Appendix U) reads, "This technical appendix describes the methods used to assess the impacts of climate change on our supply-demand balance" and as such its scope and intended purpose are clear.</p> <p>The needs of the environment in terms of reduced abstractions are covered in Section 5 of our dWRMP (and rdWRMP), and the SEA scoping is clear in terms of our consideration of climate change within the SEA.</p>	<p>No changes, for the reasons set out in our consideration.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.3 Water Framework Directive Assessment: Comments on WFD are a matter for the Environment Agency however Natural England notes: · There are several options which will impact groundwater, many of which involve increasing DO via new boreholes. Some are using headroom in licences, though others will require new licences. This seems counterintuitive to the direction of the 25YEP and guidance, where the aim is to reduce abstraction and creation of new sources. Options which involve an increase in abstraction of groundwater include:</p>	<p>Overall, we will always look to secure abstraction in places where we know the environmental impact of this is acceptable. Where we suspect there are damaging impacts, we will investigate, and if these are found, work to reduce these abstractions as soon as possible.</p> <p>As you have mentioned, we included several options in our constrained list of options for our draft plan that deliver benefit by either recommissioning a source or improving capacity of the works so that more water can be abstracted and treated, all within currently licensed limits. The WFD assessment for these options have been reviewed and updated as needed, with other assessments reviewed in light of these changes. We have included further technical information on the intended operation of the options to make our position on their sustainability clearer and more comprehensively justified, as well as making any risks clearer. We have detailed any further work needed as well as any needed mitigation and monitoring, making it clear as to when and how we anticipate this will be carried out. This approach has been discussed with local EA teams and NE. We are committed to reducing abstractions where these impact sensitive environmental receptors - this necessarily must be offset to a certain extent by increasing supply from the rest of our supply schemes to enable us to fulfil our duties regarding supply security.</p>	<p>See rdWRMP24 Appendix D which has been updated as described in our consideration, in response to this representation.</p>
<p>o Datchet Increase DO Option</p>	<p>See above</p>	<p>See above</p>
<p>o Woods Farm Increase DO</p>	<p>See above</p>	<p>See above</p>



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NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
o Moulsoford 1 groundwater option	See above	See above
o Britwell	See above	See above
o Groundwater Addington	See above	See above
o ASR Horton Kirby	See above	See above
o Mortimer Disused Source (Recommission)	See above	See above
o Merton Recommissioning	See above	See above
o Woods Farm Increase DO.	See above	See above
<p>1.3 Water Framework Directive Assessment: There are some differences between what is reported within the SEA and WFD assessment. For example, Datchet Increase DO option assessment summary suggests that no further assessment was undertaken for stage 2, though the SEA summary table highlights further investigation needed for GB40603G000300: Lower Thames Gravels. Natural England suggests that Thames Water check the consistency between the two assessments.</p>	<p>Thank you for your response. Our environmental assessments across our draft plan have been reviewed for inter and intra-report consistency (including the issue you highlight) with updates included within the equivalent environmental reports for our revised draft plan.</p>	<p>Please see rdWRMP24 Appendices B, C, D, AA, BB which have been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.3 Water Framework Directive Assessment: In level 2 screening, for many options Thames Water state that "further assessment is required to investigate the potential for deterioration in this waterbody, and to identify mitigation, if required. Thames Water will continue to review this option as this plan is finalised." Natural England queries whether this is appropriate for options that are likely to come forward in the next decade, particularly where there is potential for GWDEs and protected sites to be impacted, and defers to the Environment Agency on this point.</p>	<p>Thank you for your response. Within our revised draft plan, the WFD assessments for these options have been reviewed and updated as needed, with other assessments reviewed in light of these changes. We have included further technical information on the intended operation of the options to make our position on their sustainability (including environmental impact) clearer and more comprehensively justified, as well as making any risks clearer. We have detailed any further work needed as well as any needed mitigation and monitoring, making it clear as to when and how we anticipate this will be carried out. This approach has been discussed with local EA teams and NE.</p>	<p>Please see rdWRMP24 Appendix D which has been updated as described in our consideration, as part of planned work following our draft plan.</p>
<p>1.3 Water Framework Directive Assessment: The ASR Horton Kirby option required extra assessment for GB40601G501800: West Kent Darent and Cray Chalk, though level 2 has not been completed. This is of concern to Natural England due to risks posed to protected habitats and species. Horton Kirby has been highlighted in Section 5 Environmental Forecast document as an abstraction source that has previously had sustainability reductions and should be a priority in low and medium environmental destinations.</p>	<p>Thank you for your response. We have reviewed and can confirm that the Level 2 assessment for this waterbody was undertaken for our draft plan and is presented in the WFD report for our dWRMP24. This assessment was reviewed for our rdWRMP24; It is recommended that further investigation is carried out on how the option will be operated (abstraction conditions) to establish if this option will negatively impact groundwater flow and levels, as well as associated surface water flow. This investigation can also help identification of further mitigation measures. Following further investigation and identification of appropriate mitigation measures, it is anticipated that the WFD non-compliance risk will be removed.</p>	<p>Please see rdWRMP24 Appendix D which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.4 Invasive non-native species (INNS): · The impact matrix suggests that an option which results in regular exposure of medium severity should be assessed as moderate risk. Natural England would welcome explanation of this rating, as high risk seems more appropriate given the frequency of exposure to INNS.</p>	<p>Thank you for your response. Within the INNS assessment for our draft WRMP24, a medium severity is applied where waterbodies are already connected; the additional risk in such cases would therefore not be as high as a new hydrological link between waterbodies.</p> <p>Furthermore, all options screened as Medium or High risk were subject to a more detailed assessment using SAI-RAT.</p> <p>We have included narrative explaining this point within the INNS report for our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix BB which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.4 Invasive non-native species (INNS): · Natural England would welcome further explanation for the result of the INNS assessment of Thames to Fobney Transfer. Transferring untreated water between regions seems like a high risk.</p>	<p>Thank you for your response. Within the INNS assessment for our draft WRMP24 for this option, raw water would be transferred within pipeline between a river and a WTW and would therefore only cause INNS transfer through accidental leakage. The screening assessment does not account for the transfer distance (for this option, this distance is relatively short); however this option was subject to a more detailed assessment using SAI-RAT.</p> <p>We have included narrative explaining this point within the INNS report for our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix BB which has been updated as described in our consideration, in response to this representation.</p>
<p>1.5.1 Relationship to WRSE Regional Plan: · The regional plan scenario BAU+ may not be sufficiently robust to ensure non-European sites which are water dependent such as SSSIs, priority habitats and protected species are protected and meet targets to achieve favourable condition by 2030 as set out in the Environment Act. Natural England encourages license caps in catchments where environmental sensitivities have been identified. If there are known adverse effects or potential impacts have been identified those abstractions that affect a protected area should be addressed in this plan.</p>	<p>Thank you for your response. As described in WRSE's regional draft plan and our draft WRMP24, we have selected our High Environmental Destination scenario as part of our reported pathway. WRSE have engaged with NE concerning its vulnerable catchment prioritisation framework and has updated this in response to this feedback as part of the WRSE regional revised draft plan.</p> <p>As is described in Section 5 of our rdWRMP24, we have followed the Environment Agency's guidance with respect to licence capping to mitigate the risk of deterioration in environmentally sensitive water bodies.</p>	<p>Please see rdWRMP24 Section 5 which has been updated as described in our consideration, in response to this representation and engagement with NE.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.1 Relationship to WRSE Regional Plan: Generally, there is good alignment between WRSE Regional Plan and Thames Water's WRMP and WRSE. The exception to this is that TWU_SES_HI-TFR_LON_ALL_r10 appears in WRMP24 tables but not within WRSE regional plan.</p>	<p>The option referred to is an inter-company transfer of 15MI/d from Cheam to Merton. This has been included within the WRSE regional plan, under the same option identification referred to, and can be found within the options appraisal summary report.</p>	<p>The WRSE Regional Plan and our WRMP are aligned in terms of options selected and as such we have not made changes following this response.</p>
<p>1.5.1 Relationship to WRSE Regional Plan: In the early stages of the plan, demand management is the focus for addressing population growth and environmental demands. Whilst supply-demand balances are not within Natural England's remit, there is concern about failure to address demand and impacts on Thames Water's ability to reduce damaging abstractions on the environment.</p>	<p>As with previous plans, there remains risk around delivery. We have planned for this risk to our supply-demand balance with the inclusion of target headroom, which estimates uncertainty. We have also performed scenario and sensitivity testing in WRSE optimisation, to further understand requirements if forecast baseline figures (e.g. population/supply/demand), or options change.</p>	<p>No change made as a result of this representation, as we consider that we have already satisfied the requirement within our draft plan.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.1 Relationship to WRSE Regional Plan: As discussed in section 1.3 of this response, many options involve increasing abstraction from groundwater. Whilst these will involve minimal impacts during the construction period due to recommissioning boreholes or using headroom in existing licences, there may be operational impacts. Natural England defers to the Environment Agency regarding abstraction strategies, though highlights concern about increasing abstraction and impacts on GWDEs.</p>	<p>Overall, we will always look to secure abstraction in places where we know the environmental impact of this is acceptable. Where we suspect there are damaging impacts, we will investigate, and if these are found, work to reduce these abstractions.</p> <p>As you have mentioned, we included several groundwater options in our constrained list of options for our draft plan that deliver benefit by either recommissioning a source or improving capacity of the works so that more water can be abstracted and treated, all within currently licensed limits. The WFD assessment for these options have been reviewed and updated as needed, with other assessments reviewed in light of these changes. We have included further technical information on the intended operation of the options to make our position on their sustainability clearer and more comprehensively justified, as well as making any risks clearer. We have detailed any further work needed as well as any needed mitigation and monitoring, making it clear as to when and how we anticipate this will be carried out. This approach has been discussed with local EA teams and NE. We are committed to reducing abstractions where these impact sensitive environmental receptors - this necessarily must be offset to a certain extent by increasing supply from the rest of our supply schemes to enable us to fulfil our duties regarding supply security.</p>	<p>Please see rdWRMP24 Appendix D which has been updated as described in our consideration, in response to this representation.</p>



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NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.3 Natural capital and resilient landscapes and seas:</p> <ul style="list-style-type: none">· Natural England welcomes the inclusion of the Natural Capital (NC) and Biodiversity Net Gain (BNG) assessments for the Least Cost Plan (LCP) and Best for Environment and Society Plan (BESP) for completeness, though have focused only on BVP.· The following advice is based on Natural England's review of Appendix AA - Net gain and Natural Capital.	<p>Thank you for your response.</p>	<p>N/A - general comment</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.3 Natural capital and resilient landscapes and seas: · In previous discussions with the water company, it was understood that details of catchment options would be included in the Biodiversity Net Gain and Natural Capital Assessment documents. Natural England has not been able to locate any assessment of catchment options or descriptions of these options as suggested. If they are not included within the plan, Natural England advises that this is corrected before the plan is published.</p>	<p>Thank you for your response. We did not carry out NC/BNG assessment of the catchment options within our draft plan, owing to the nascent nature of these options and relatively small amount of option information available for them. We apologise for not being clearer in our communications concerning this.</p> <p>We are committed to exploring and quantifying the benefits of nature based solutions for water resources planning. As part of WRSE we have developed an ambitious Water Industry National Environment Programme (WINEP) investigation for the region that will focus on better quantifying needs and wider benefits and supporting the piloting of test case options. Working regionally offers us the opportunity to make the pilots more efficient in yielding maximum breadth of insight on the benefits of different option types, as well as allowing us to understand where in the region would benefit most from these options from a flow resilience perspective.</p> <p>In AMP8 we will consider nature-based solutions in more detail as a company as part of our WINEP programme, with a particular focus on establishing where nature-based solutions may mitigate the environmental need for abstraction licence reductions.</p> <p>In addition, it is important to note that the Water Resources Management Plan is not the only area of Thames Water which is considering the adoption of nature-based solutions, with multiple workstreams across the company considering and funding them to solve different problems. Different workstreams</p>	<p>N/A - no change needed as our response refers to work to take place in future planning cycle.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
	<p>considering nature-based solutions have different drivers, and we map catchment vulnerabilities to understand where interventions will have the biggest impact. Drivers include water quality, improving urban drainage, river restoration and community engagement and education. Many of these programmes have recently been expanded to cover more of our supply area, built on a solid foundation of working over a number of years with community stakeholders. We know that we have further work to do to integrate our view of drivers for and benefits of NBS, and this is something that we will continue to do in future planning cycles.</p>	



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.3 Natural capital and resilient landscapes and seas: The following options have been "scoped out due to the current available option information":</p> <ul style="list-style-type: none"> o Thames Water (Henley) to Thames Water (Kennet Valley) Conveyance o SWA to SWOX. 	<p>Thank you for your response. Both of these options are existing transfers, and so were scoped out of the NC and BNG assessments for our draft plan. We have updated our revised draft plan to make this reasoning clear.</p>	<p>Please see rdWRMP24 Appendix AA which has been updated as described in our consideration, in response to this representation.</p>
<p>1.5.3 Natural capital and resilient landscapes and seas: The reasoning for options being scoped out of Natural Capital and Ecosystem Services assessment is not clear, i.e. the amount, detail or nature of information available. Natural England recommends that an explanation of how data gaps will be filled is included in the final plan, along with a timetable to address omissions. This is particularly pertinent for schemes which are needed earlier in the plan and applies to other options including DP- Playhatch-KV and DP- Gatehampton-SWOX where the reason given for being scoped out is due to there being "No corresponding GIS".</p>	<p>Thank you for your response. Within our updated report as part of our revised draft plan, we have included further details on the reasoning for options being scoped out of Natural Capital and Ecosystem Services assessment.</p> <p>We have also included further information on proposed actions to be addressed during more detailed design stages and a timetable for achieving these which is appropriate to when in the plan these options are selected.</p>	<p>Please see rdWRMP24 Appendix AA which has been updated as described in our consideration, in response to this representation.</p>
<p>1.5.3 Natural capital and resilient landscapes and seas: There is no reason given for scoping out the TLT extension from Lockwood PS to King George V Reservoir intake option. This should be addressed.</p>	<p>Thank you for your response. This option has been reviewed and scoped into our natural capital and biodiversity net gain assessments as part of our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix AA which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.3 Natural capital and resilient landscapes and seas: Natural England would welcome further consideration of impacts of options that result in an increase in abstraction. Namely, Mortimer Disused Source (Recommission), Groundwater Addington, Datchet Increase DO, Moulsoford 1, Britwell Removal of Constraints. It is understood that there will not be any changes in land use associate with these options due to (mostly) using/improving existing infrastructure. However, the schemes could cause a change in the groundwater levels and potential local hydrology. Therefore, an impact on Natural Capital is possible.</p>	<p>Thank you for your response. Impacts on groundwater levels or local hydrology have not been explicitly considered as part of the natural capital assessment for our WRMP24. We will look to include this for WRMP29; this has been discussed with our regulators.</p> <p>We have considered impacts on groundwater levels or local hydrology from our proposed options within our WFD, HRA and SEA assessments.</p>	<p>The Britwell option referenced has been rejected as a result of Environment Agency concerns over the risk of deterioration.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.3 Natural capital and resilient landscapes and seas: TWRM extension - Hampton to Battersea option has been scoped out for assessment due to the footprint of the scheme not intersecting any of high value stocks, as it is expected to be contained within a tunnel below the surface. Thames Water surmised that the option will not lead to the loss of Natural Capital stocks or associated ecosystem services. This contrasts with the SEA outcomes, where Thames Water concluded that "moderate negative residual construction effects on biodiversity, flora and fauna, and moderate negative residual operational effects on embodied and operational carbon [could occur]. The tunnel intersects SSSI/SAC/NNR Richmond Park with potential to result in loss of habitat or disturbance to designation interest features during construction. The tunnel also has direct impact on Groundwater Dependant Terrestrial Ecosystem (GWDTE) and Priority Habitat". Natural England would welcome clarity on this difference in assessment.</p>	<p>Thank you for your response. This option has been reviewed in light of further option information and scoped into our natural capital and biodiversity net gain assessments as part of our revised draft plan.</p>	<p>Please see rdWRMP24 Appendix AA which has been updated as described in our consideration, in response to this representation.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.3 Natural capital and resilient landscapes and seas: There are conflicting conclusions between the SEA and NCA screening in regard to Teddington DRA 75 MLD - Construction. Within the screening of the NCA, Thames Water states that further NC and BNG assessments were scoped out due to not including any Natural Capital Stocks. Conversely, within section 4.8 of the SEA, Thames Water report that "For the Mogden Reuse option, moderate negative residual effects are identified for the biodiversity, flora and fauna during the construction phase as there will be a permanent reduction in the natural capital value of this site where the new WTW is to be located. All options are identified to have moderate negative residual effects on air during the construction phase due to emissions from construction related activities." Natural England would welcome clarity on this difference in assessment.</p>	<p>Thank you for your response. This difference in assessments has arisen because treatment for each of the options referred to is located in a different place; for the Teddington DRA option, treatment will be located on the existing Mogden STW site, and for the Mogden Reuse option, treatment will be located at a new works near our existing Kempton WTW.</p>	<p>No change needed – please see commentary.</p>
<p>· There are some options which Natural England would like to highlight due to loss of priority habitats: o Kempton - 150 - Construction option results in a loss of water dependent stocks, including lakes and standing waters, ponds and linear features.</p>	<p>Thank you for your response. We've reviewed our assessments based on updated, more refined GIS for this option which includes smaller defined areas for permanent and temporary works within the larger site footprint. The results of these updated assessments are available in the NC/BNG report for our revised draft plan (Appendix AA).</p>	<p>In response to this representation we have undertaken review of the assessment of this option in order to minimise loss of priority habitats – details of the updated assessments are available in rdWRMP24 Appendix AA (Biodiversity Net Gain and Natural Capital report).</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>o It is positive that Reservoir Abingdon 100 (Lon) – Construction option results in an increase in coastal and floodplain grazing marsh, lakes and standing waters and ponds and linear features. However, it is noted that there are significant losses in other natural capital stocks, such as active flood plain and arable land.</p>	<p>Thank you, this is noted and reflects our assessment for the WRMP and for RAPID Gate 2 submission. We will continue to update our appraisal of the biodiversity net gain and natural capital of the SESRO scheme as our understanding of the baseline conditions is enhanced through future survey work and as the scheme design progresses. This should ensure that a suitable and holistic mitigation package is developed.</p>	<p>No - changes to be informed by longer term programme to develop option through Gate 3 and beyond.</p>
<p>o Henley to SWOX - 5MI/d - Woods Farm Increase DO result in loss of ancient woodland, which is not replaceable.</p>	<p>Thank you for your response. As part of planned further work to minimise environmental impacts as we finalise our plan, we have reviewed our options for opportunities to re-route to avoid impacts on ancient woodland. We are pleased to confirm that this has resulted in avoidance of impacts on ancient woodland for our Henley to SWOX option and the majority of our other feasible options - further details are available in Appendix AA (Biodiversity Net Gain and Natural Capital report).</p>	<p>As part of our planned work we have undertaken re-design/re-routing of options in order to minimise loss of ancient woodland under different options' proposals – details of the updated assessments are available in rdWRMP24 Appendix AA (Biodiversity Net Gain and Natural Capital report).</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>At present, there are few details regarding how losses will be addressed. Thames Water state that "habitat identification will need to be refined at the project level with both habitat survey data and further development of habitat mitigation / enhancement proposals. The number of units required to achieve a 10% biodiversity net gain has also been presented in Table 4.4 below." Table 4.4 suggests the number of units that will need to be "purchased". Firstly, Natural England would request that timescales for further surveys are included to ensure that knowledge gaps are addressed. This is important to establish early on to ensure that are included within plans where applicable. Secondly, Natural England queries whether Thames Water are planning to purchase units via credit schemes. It is important to note the BNG principles should be followed as closely as practicable, meaning securing the BNG as close to the site of impact as possible, to avoid gaps in nature developing. However, there are benefits in achieving BNG in sites of 'strategic significance'.</p>	<p>Thank you for your comment. We are continuing our work in this area within our WRMP24 with the development of our BNG strategy, a holistic delivery strategy to achieve ambitious net gain across our Non-SRO and SRO options as part of our plan. We can confirm that in developing this strategy, we have followed the BNG mitigation hierarchy as is best practice, and we have also looked at opportunities for strategic offsetting sites to deliver more effective net gain for multiple options. Credit purchase was referred to in our draft plan as a legitimate 'worst case' scenario to ensure that in the absence of more detailed work that we could evidence our intentions to meet our statutory requirements for our plan. Our work since the draft plan in developing our strategy has provided more detail around our plans for mitigation and improvement.</p> <p>This strategy is available as part of our revised draft plan, and we will continue this work over future planning cycles.</p> <p>Within our BNG / NC report as part of our revised draft plan we have also included further information on proposed actions to be addressed during more detailed design stages, and a timetable for achieving these which is appropriate to when in the plan these options are selected.</p>	<p>Please see rdWRMP24 Appendix AA for our BNG strategy, developed as part of planned further work in this area.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.4 Connecting people with nature – demand management: · Thames Water are not planning to meet the per capita consumption target of 110 litres per day, as detailed in Annex 2. Natural England would welcome further conversations on this element of the plan, as it is imperative that water companies seek significant demand management measures to remove existing detrimental impacts on the environment and allow nature to recover as soon as possible and not awaiting until new supplies come on- line, where applicable. However, Natural England do commend Thames Water’s candour on this matter, making it clear that they are not comfortable with including a lower PCC in the plan that would introduce a high level of uncertainty to the supply-demand balance.</p>	<p>We fully support the government’s plans to introduce measures to support long-term, sustainable water use across the UK.</p> <p>Taking government-led and our own actions into account, we forecast (in our draft plan) that average water use in our area will reduce again to around 123 litres per head per day by 2050. Since our draft WRMP further guidance has been received from the Environment Agency, Ofwat and Defra that sets a clear policy pathway to 110 l/h/d by 2050, and 122 l/h/d by 2037/38, and new targets for NHH too. We aim to achieve these new household and non-household targets in our revised draft plan through some improvement in our reductions and further government led reductions. We made it clear in our draft WRMP that further customer reductions were challenging from the analysis carried out to date, and we maintain that reducing consumption remains difficult, as the activities that are within our power are largely driven by our involvement in public education and as such are very dependant on external factors.</p>	<p>Please see Section 8 of our rdWRMP24 which has been updated as described in our consideration in response to further guidance.</p>



NE Consultation Response	Our consideration	Changes to the draft WRMP24, or if no changes are made, why not
<p>1.5.4 Connecting people with nature – demand management: Natural England are pleased to see that Thames Water are planning to meet 50% leakage reduction by 2050. However, since publishing the dWRMP, interim targets have been set out in the Environment Improvement Plan (EIP) (see Annex 2):</p> <ul style="list-style-type: none"> o Water companies to cut leaks by 50% by 2050 o 20% leakage reduction by 31 March 2027 o 30% leakage reduction by March 2032 <p>Only the ‘high plus’ demand reduction programme scenario, outlined in Section 8, table 8, will result in 20% leakage reduction in AMP8. The medium reduction programme (TWU_XXX_EF-LKR_ALL_ALL_advanced dma med) scenario has been selected, which results in 15% in AMP8.</p>	<p>We are committed to reduce the amount of water lost through leaks. We reviewed our leakage reduction options for the revised draft plan and have increased our ambition to more than halve leakage levels by 2050, with interim targets of a 20% reduction by 2027 and 30% reduction by 2032. These are challenging targets and will require new thinking and innovative approaches.</p>	<p>Please see Section 8 of our rdWRMP24 which has been updated as described in our consideration, in response to the EIP.</p>
<ul style="list-style-type: none"> · Natural England is pleased to see that Thames Water are planning to meet 1 in 500 drought resilience by 2050. 	<p>Thank you for your comment. We are aiming to meet the 1 in 500-year resilience standard by 2040, as is required by the Water Resources Planning Guideline.</p>	<p>No changes requested</p>

