



Thames Water Draft Water Resources Management Plan 2024

Statement of Response

Appendix E:
Response to NRW representation

August 2023



Table of contents

- Section 1 Introduction 2
- Section 2 Response to Natural Resources Wales representation..... 3
- A Environmental assessment of options3
- B Compliance to Welsh legislation (environmental destination for Wales).....4
- C Stakeholder engagement4
- D Changes made to the draft plan, and if no changes why not5



Section 1

Introduction

- 1.1 This document sets out the representation from Natural Resources Wales to the public consultation on our revised draft Water Resources Management Plan 2024 (dWRMP24), hereafter referred to as the revised draft plan. The issues raised by Natural Resources Wales are shown in **bold font** and our consideration and response to the issues are shown in numbered paragraphs below each issue. We have also set out the changes that we have made to our revised draft plan as a result of the issues raised.

Section 2

Response to Natural Resources Wales representation

A Environmental assessment of options

The company's preferred draft plan includes supply schemes that could affect the environment within Wales.

With regards to the Severn Thames Transfer Strategic Resource Option (STT SRO) scheme we consider that the Habitats Regulations Assessment (HRA) work undertaken to date, cannot rule out Likely Significant Effects on the features of the Severn Estuary / Môr Hafren Special Area of Conservation (SAC) and the Severn Estuary RAMSAR. Additional water released from Lake Vyrnwy will impact the Afon Vyrnwy, and the mobile species from the Severn Estuary SAC which utilise these habitats, during a critical life stage for these species (i.e. this waterbody is functionally-linked to the SAC). The impacts to the designated features will have to be incorporated by the Severn Thames Transfer SRO whilst utilising these waterbodies within their appropriate assessment and site integrity test.

In addition, we are also concerned that this option is not fully compliant with the Water Framework Directive Regulations (WFD Regs). All necessary permits including full HRA and WFD Regs assessments of all likely impact pathways must be undertaken prior to the scheme becoming operational, including the impacts from the proposed increase in releases from Lake Vyrnwy.

Prior to this becoming operational a full HRA and WFD Regs assessment must be completed, and all required permits obtained. It is anticipated that this work will be undertaken as part of the Severn Thames Transfer SRO.

We expect the company to continue to engage with us, the Environment Agency, and Natural England along with other water companies who have a shared interest in the River Severn and the Estuary. This will ensure the current modelling capability for the river is improved to better understand the water availability, environmental and wider implications of options on the River Severn and the Estuary.

Response

We acknowledge the points raised regarding potential impacts on Severn Estuary SAC and linked habitat and recognise the need for further work to be undertaken as part of the Severn Thames Transfer SRO further development, with continued close engagement with NRW during this process.

Preliminary assessment of potential for impacts of the STT SRO scheme on the environment has been undertaken as part of the RAPID gated process. Data has been obtained from extensive hydro ecological and physical environmental monitoring surveys, the outputs of hydraulic and water quality modelling and results from in-channel habitat modelling. Using this evidence, potential for adverse effects on the Severn Estuary Special Area of Conservation (SAC) and its functionally linked habitat were identified. We have therefore sought to avoid adverse effects,

through a design iteration comprising a reduced proposal for a direct release volume of 25MI/d into the River Vyrnwy, with a bypass transfer of 155MI/d to the River Severn. This change demonstrates our commitment to protecting the Severn Estuary SAC, and compliance with Welsh legislation.

In addition the proposals for Minworth WwTW include for the provision of additional advanced water quality treatment units that would be used to treat the tertiary treated final effluent to higher standards prior to discharge to the River Avon for the STT solution. The treatment units have been selected by the Minworth SRO with the objective of preventing deterioration of water quality and to protect and enhance the WFD status of the River Avon. Bench testing and pilot plant trials associated with the Minworth SRO are being planned as part of the current Gate 3 work to verify the performance of these proposed additional treatment units.

B Compliance to Welsh legislation (environmental destination for Wales)

Working with Severn Thames Transfer and Water Resources West, Thames Water should demonstrate mitigation measures (as relevant) that will be implemented to ensure the enhancement of ecosystems and wider benefits within Wales from the use of water from Vyrnwy reservoir. This will help meet the Environment (Wales) Act and the Wellbeing of Future Generations Act legislative requirements.

Response

Initial work has also been undertaken on a wider benefits investigation to identify potential multiple environmental and societal benefits across the project. The work aligns to the Sustainable Management of Natural Resources and associated Well Being Goals for Wales. Potential opportunities include river restoration; creation and improvement of habitats, including wetlands and tree planting; improvements to footpath access and outdoor educational spaces. As the scheme is developed, we recognise the need to develop this further, working with NRW and other Welsh stakeholders.

C Stakeholder engagement

We welcome continued engagement with ourselves and the other regulators regarding SROs affecting Wales. However, we are disappointed in the level of engagement with wider stakeholders such as eNGOs, alongside the other water companies involved.

The company should ensure they are fully engaging relevant Welsh stakeholders around the proposals, especially where it may impact the environment, society, and economy of Wales and with agreeing actions to achieve the Welsh legislation requirements. Therefore, we recommend the company includes a stakeholder engagement plan for this scheme within its final plan. It would be helpful if the source of Water from Vyrnwy is consistently recognised as being from Wales as well as being a release of water which currently supplies North West England.



Response

We accept the need to do more engagement with Welsh stakeholders at this stage in the process. We are working closely with WRW, Severn Trent and United Utilities to review and fully update a stakeholder engagement plan for Welsh stakeholders. We now have a joined-up engagement plan across the WRW core member companies and the STT and NWT projects for these aspects. This includes updated messaging and references that the water from Lake Vyrnwy is from Wales. We have started to implement this plan, with a WRW presentation to the broadly attended NIC Wales/Consumer Council for Water conference in Cardiff on 31 March, a Hafren Dyfrdwy and STT meeting with Plaid Cymru on 19 April and WRW/STT meeting with the Wildlife Trusts along the Severn on 24 April. This also included the Dee Rivers Trust and the Severn Rivers Trust. Further coordinated engagement is planned, and we welcome NRW input into our stakeholder engagement plan. Initial work has also been undertaken on a wider benefits investigation undertaken to identify potential multiple environmental and societal benefits across the project. The work aligns to the Sustainable Management of Natural Resources and associated Well Being Goals for Wales. Potential opportunities include river restoration; creation and improvement of habitats, including wetlands and tree planting; improvements to footpath access and outdoor educational spaces. These could provide improvements to water quality; reduction in downstream flood risk; biodiversity enhancements; enhanced carbon sequestration and storage and recreation, health, fitness and wellbeing. We are working with Water Resources West (WRW) and other water companies in the West of England and Wales, who are already progressing nature-based solutions to support local water catchments. Their plans include creating extra value for Wales through land management work around the Upper Severn and the Dee catchments which would improve water quality and biodiversity and reduce flood risk.

D Changes made to the draft plan, and if no changes why not

We have not made changes to the plan as a direct result of this response for the reasons set out in our consideration of the points raised. In our revised draft plan, however, in order to comply with changes to the Water Resources Planning Guideline, we have assumed achievement of the 110 l/h/d Per Capita Consumption target. The inclusion of this target means that the Severn-Thames Transfer is no longer needed in 2050, as the overall volume of new resources required is diminished. We will continue to develop the STT option and as such will continue to undertake environmental and engineering assessments of the scheme, such that it can be developed if needed. We will continue to engage with Natural Resources Wales regarding the development of the STT.

