

Appendices

A Consultation responses

Table A1: Environment Agency consultee response

Consultee Reference	Consultee Responses	Comment and Amendments
General Point	We would recommend that the structure of the document is revised. Readability and cross referencing would be improved by integrating the baseline section into the body of the document, rather than an appendix.	A review of the environmental baseline is provided in section 2.3 with full details in Appendix C
General Point	We would welcome the consideration of WRMP24 proposals within the assessment (in-combination and cumulative) and it would also be good to understand how the drought plan will align and be kept up to date following publication of WRMP24.	WRMP19 and cumulative assessment considered in the plan but not possible to consider options for WRMP24 due to timescales.
Page 1 – Section 1.2.1	We appreciate that customers and legislation will be Bristol Water' primary focus in the event of a drought. However, a reference the environmental conditions which will also be under stress as a result of the drought would be useful.	Comment has been accepted and section 1.2.1 has been edited to include this change.
Page 2 – Section 1.2.2	Some of the 68 sources would be under more pressure than others during a drought. Highlighting the environmental sensitivity of these sources would be helpful.	Comment has been accepted and section 1.2.2 has been edited to mention the sensitivity of these sources.
Page 8 - Section 1.2.5	We would like the company to provide some clarity on whether the drought management triggers will be reviewed as part of the 2022 Drought Plan process. The triggers should be reviewed against climate change predictions and guidance UKCP19 to ensure they are still appropriate.	The drought plan triggers have been reviewed in that they have been tested via the drought scenario modelling work (Appendix B). However, a wholesale review of the triggers has not been implemented as Bristol Water is in the process of reviewing and updating their inflow record and water resource modelling tools. Once this work is complete the

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		drought triggers (reservoir control curves) will be reviewed using the updated data, information and tools available. In terms of the reference to climate change, the drought plan is an operational tactical plan that sets out what Bristol Water would do if a drought occurred today under today's system infrastructure. It does not forecast into the future (unlike the WRMP). There would be little point in assessing the drought actions against a future climate in the 2080's as per the UKCP19 scenarios. Climate change that has already been experienced to date is incorporated into the assessment by using information from the historic inflow record and rainfall runoff modelling to test our drought response.
Page 8 - Section 1.2.5	In regards to the 'R24R and Wellhead (R24Ra)' section, for any abstraction that is not currently operational (even if licenced), compliance with the Eels (England and Wales) Regulations 2009 will need to be checked as part of any works to the site to return it to an operational state. The above legislation is included in Table 2.1 and therefore should be considered in the SEA which is good but we wanted re-iterate this at this stage.	Comment noted and is covered in the HRA Screening report
Page 9 - Section 1.2.5	<p>In regards to the following text "<i>Bristol Water is currently undertaking adaptive management trials under the Water Industry National Environment Programme (WINEP) at Blagdon Reservoir and Chew Valley Reservoir. This involves changes to compensation flow releases from the reservoirs aimed at improving ecological quality in the downstream waterbodies (River Yeo and River Chew, respectively). The implications of this change will be considered in the development of the Draft Drought Plan and as part of the SEA.</i>"</p> <p>It is good that the adaptive management trials at Chew Valley and Blagdon Reservoirs will be considered as part of the SEA and draft drought plan. This is important because whilst these are in the trial phase, it is important to consider how the drought plan may be altered if the trials are successful</p>	Response has been accepted. No change is required.

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	and become a permanent change. This is something that we have raised previously and therefore we are pleased to see that it has been included.	
Page 9 – Section 1.3	It is worth stating that EARs will be prepared for any additional agreed drought permit options.	Text of section 1.3 has been updated stating that EARs will be prepared for any additional agreed drought permit options.
Page 16 – Section 2.1	<p><i>“The current environmental baseline conditions and their likely evolution during the life of the plan is presented in Appendix B and discussed in Sections 2.3 and Error! Reference source not found..”</i></p> <p>Link (highlighted) not working.</p>	The error reference and link in section 2.1 have been updated with respect to the Environmental Report.
Page 17 – Table 2.1	<p>In the ‘Plans, Policies and Programmes’ column for ‘Biodiversity, flora and fauna’, the following International legislation should be referenced:</p> <p>European Commission, Establishing Measures for the Recovery of the Stock of European Eel (1100/2007)</p> <p>If Bristol Water agree that this legislation should be included in the Scoping Report, then it will also need including in the Appendix A, Table A1.</p>	Text in Table 2.1 has been amended to include and reference the International legislation.
Page 18 – Table 2.1	<p>In the ‘Plans, Policies and Programmes’ column for ‘Biodiversity, flora and fauna’, the following Regional/Local plan should be referenced:</p> <p>Defra (2010) Eel Management Plans for the United Kingdom: South West River Basin District</p> <p>This is because the area of consideration spans both the Severn and the South West RBD, both of which have separate Eel Management Plans.</p>	Text has been amended to include and reference the plan.
Page 27 – Section 2.3.2	The company acknowledge that some data used in the assessment may be old. We’d be keen to understand how data will be utilised as and when it becomes available.	As and when new data becomes available it will be used as appropriate.

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Page 27 – Section 2.3.3	It's not clear what is meant by "The need to recognise the importance of allowing wildlife to adapt to climate change". Actions to help/enable wildlife to adapt to climate change is important.	Response has been accepted and text has been amended in Section 2.3.3
Page 27 – Section 2.3.3	With reference to INNS, can this be taken a step further i.e. 'control <i>and reduce</i> ' spread of INNS?	Response has been accepted and text updated in section 2.3.3 and Table 4-1
Page 28 & Page 90	'The need to maintain the quantity and quality of groundwater resources taking into account WFD objectives' – accept how the objective was derived, but omission of surface water appears odd.	This is covered by the bullet above which states: ' <i>The need to further improve the quality of the region's river, estuarine and coastal waters taking into account WFD objectives and designated sites objectives (i.e. assessment against Common Standards Monitoring Guidance, where relevant)</i> '.
Page 30 – Section 3	The ecosystem services and natural capital benefits of the environment are referred to throughout section 3. There is however no mention of incorporating an ecosystem services assessment or natural capital assessment in 3.2.	Natural capital included via objective 1.1 in the assessment methodology. However, further consideration of NCA is not applicable to DP
Page 40 - Section 3.2.1, Table 3.2 & Figure 3.1	Will there be any explanation provided as to how the 'Magnitude of effect' and 'Value/sensitivity of receptor' will be established (Low/Medium/High for example)?	Included in section 3.3 of the plan
Appendix A	You might find it useful to look at scoping documents from other water companies to identify if your SEA has full coverage of plans and programmes in operation.	All documentation has been reviewed where available, noting differing timescales across the various water companies.
Appendix A	Environment Agency published guidance document should also be utilised as well as all of the documents referred within it.	Response has been accepted – Document has been added to Appendix B and considered in report.
Appendix A	We'd recommend considering inclusion of: <ul style="list-style-type: none"> Other companies final published plans 	Last round of RBMPs and FRMPs have been considered in section 5.6. The other documents have been considered and included in Table 2.1 and within Appendix B.

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	<ul style="list-style-type: none"> Draft Water Resources Management Plan Guidelines which are currently out for consultation Environment Agency's EA2025 "Creating a Better Place" report published in 2020 Environment Agency's Abstraction plan available from here: https://www.gov.uk/government/publications/water-abstraction-plan-2017. River Basin Management Plans are going to be updated for cycle 3 and it will be good to reference these as there may be some changes. <p>There are also going to be new Flood Risk Management plans as well.</p>	
Appendix A	The company should also include Local Catchment Partnerships and links with Regional Planning.	Bristol Avon catchment partnership is already present in Appendix B.
Page 60 - Table A1	<p>Under 'The Eels Regulations 2009' there is a typo in the second column as follows: <i>"The SEA should seek to should seek to maintain the quality of habitats and biodiversity and take regard of protected species identified. This should include migratory fish species and their migratory passage."</i></p> <p>Duplicated wording (highlighted)</p> <p>However, the text used in the second column does not appear to be specific to the legislation it is referring to. For example, the Regulations provide statutory requirement for providing and maintaining passage for eels and preventing their entrainment (in regards to abstractions). The SEA should therefore address any potential issues in regards to passage for eels and entrainment.</p>	Response has been accepted. Text in Table B1 has been updated to be more specific to regulations in question.
Page 64 - Table A1	Under 'Defra (2015) The Great Britain Invasive Non-native Species Strategy' there is a typo in the second column as follows: <i>"The implementation of the Drought Plan may influence biodiversity in the south east and as such the SEA should seek to maintain or enhance the quality of habitats and biodiversity."</i>	Response has been accepted – yes, should say south west, text in Table B1 has been amended.

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	<p>Should this be 'south west'?</p> <p>This text also does not reference INNS and therefore Bristol Water should assess if this text needs revising.</p>	
Page 68 - Table A1	<p>In the 'Regional and Local' section of the Table (page 68 onwards) the following plan is not listed, but is referenced in Table 2.1:</p> <p><i>"Defra (2010) Eel Management Plans for the United Kingdom: Severn River Basin District"</i></p>	Response has been accepted – reference to the plan has been removed from Table 2.1.
Page 73 -- Section B.1.1.	Designated sites: also could include a line on Local Wildlife Sites (LWS), which although not statutorily designated are a material consideration in planning terms and often include river corridors (in former county of Avon Unitary Authority areas most watercourses are LWS's)	Response has been accepted – although a count of LWSs has not been included due to difficulties in collecting that data.
Page 75 -- Section 'Priority Habitats and Species'	<p>Typo identified in the species list as follows:</p> <p><i>"White clawed crayfish and"</i></p> <p>Remove the word 'and'.</p>	Response has been accepted – word 'and' has been removed from Appendix C.
Page 75 - Section 'Water Framework Directive - ecological status'	In this section, we would suggest that in addition to referencing 'ecological status', 'ecological potential' should also be used. This is because Good Ecological Potential is the term used for Artificial or Heavily Modified Waterbodies whereby they will not be able to meet GES, because of their nature.	Response has been accepted. This text has not been brought forward into the environmental report and as a result no change has been made,
Page 75 - Section 'Water Framework Directive -	This section could be strengthened to highlight current pressures identified across the RBD and their relevance to the plan.	Response has been accepted, and the appropriate text has been amended in Appendix C.

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ecological status'		
Page 85 – Section B.4	Why is there no description of water availability or water resource reliability? ALS available to do this.	Response to comment: ALS doesn't deal with drought situations, but a reference will be included to explain relationship between ALS and drought planning.
Page 85 – Section B.4.1	There is a section on flooding, but discussion of previous droughts in the context of the BW area is also needed e.g. rainfall deficit against mean annual rainfall, last period water restrictions were used and conditions leading to that etc.	Response has been accepted and limited information has been added into the appropriate location in Appendix C: we recommend consultation with Bristol Water on their historical drought records if amended text is still inadequate.
Page 85	Table of SPZs with details would be useful.	It is considered that SPZs are not relevant to drought measures.
Page 86	Key pressures in the 'catchment' – do you mean area?	Response has been accepted and the word 'catchment' has been changed to 'area' in the appropriate location in appendix C.
Page 86	Consider placement/wording of Key Pressures section, as unclear whether this relates to pressures affecting WFD status or in general, and whether referring to all waterbodies or just estuaries.	Comment is acknowledged – however, the existing placement fits with structure of report. No change made.
Page 88 - Figure B3	Colour scheme needs improvement, as very difficult to make out.	Response has been accepted and the figure has been amended to make it clearer.
Page 89 - Figure B4	Again, consider changing colour scheme for Groundwater Quantitative Status.	Response has been accepted and the figure has been amended to make it clearer.
Page 90 – Section B.4.3	Perhaps worth referring to the target headroom for BW's supply and demand forecast here.	

Table A2: Natural England consultee response

Consultee Reference	Consultee Responses	Comment and Amendments
General	We are pleased that Bristol Water PLC will undertake a Strategic Environmental Assessment (SEA) to ensure that the Drought Plan does not adversely impact the environment. The SEA assessment should act as an evaluation tool for the environmental effects of the plan, including the nature and degree of impact. Natural England believes the proposed SEA scope is generally appropriate though we consider that there are aspects that could be enhanced (see Annex 1 for our detailed comments on this).	Response has been accepted, and it is deemed that no editing of the report is required,
General	In our responses to the previous two Bristol Water Drought Plans we requested that the drought management triggers explicitly describe how environmental requirements are taken into account, alongside continuity of supply to customers. This particularly applies to the water availability and quality of the reservoir SSSIs. Our reading of Figure 1.3 in the SEA Scoping document, and its associated text, suggests that this analysis has not been undertaken. We would like to clarify if this interpretation is correct. Given the EA's Environmental Destination guidance which is now central to the new Regional Water Resource Planning process, we are of the view that environmental needs should also be given adequate consideration when deciding when and how to invoke supply control measures.	Bristol Water's drought management process sets out that demand measures would be implemented to reduce demand at the beginning of a drought. Modelling assessment illustrates that this would reduce the drawdown effect on the reservoirs, therefore protecting the SSSI. Investigations at Blagdon Reservoir between 2016 and 2018 have also been carried out to assess the effect of seasonal drawdown on macrophyte communities. This concluded that a seasonal zonal transition from aquatic to terrestrial species occurs, with macrophyte communities recolonising the lakebed after each annual drawdown period. This provides evidence that the key macrophyte communities in Blagdon Lake do recover from seasonal lake drawdown. Using the outputs of this work during a drought situation surveys and mitigation measures would be implemented if necessary, to maintain the ecological conditions of the lake. In addition, Bristol water is in the process of reviewing and updating its inflow record and water resource modelling tool. Once this work is complete the drought triggers (reservoir control curves) will be reviewed using the updated data, information and tools available.

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General	<p>Generally Natural England consider that the scoping document has highlighted appropriate SEA objectives and proposed sensible baseline evidence gathering.</p> <p>However, we advise that there may be some gaps in both the proposed 'baseline key issues', 'SEA objectives' and 'key questions', these are summarised below by SEA Topic as presented within Table 3.1 of the Drought Plan Scoping document:</p>	Comments below carry responses to this point.
Biodiversity, flora and fauna	We acknowledge that a thorough list of 'policies, plans and programme key messages' has been included in Table 2.1 for biodiversity. However, we advise that Bristol Water PLC should consider the potential for future requirements linked to the Environment Bill ¹ which are likely to be relevant to Bristol Water's final drought plan. We advise that this should also be referenced in Table A1 of the Appendix of the Drought Plan SEA Scoping Report	Response has been accepted and text of Table 2.1 has been amended
Biodiversity, flora and fauna	Objective 1.1 aims to "...conserve and enhance biodiversity, including designated sites...", and this is echoed in the key questions outlined in Table 3.1. Natural England would encourage Bristol Water PLC to identify areas where habitat improvement works, prior to drought action, may help to provide resilience to increased stress from abstraction pressure. This should be incorporated into the baseline assessment.	This is the responsibility of Bristol Water and there are no associated changes within the Drought Plan Environmental Report
Biodiversity, flora and fauna	There seems to be some disparity between the SEA objectives and the baseline key issues and indicator questions. For example, climate change is mentioned in the baseline key issues – but this is not translated into the SEA objectives. Climate change poses a significant risk to the water environment and water resources. As such, Bristol Water PLC may need to consider the exacerbation of water resource stresses from climate	It is worth noting that the Drought Plan is only a five-year plan, and as a result, it is not deemed necessary to alter any text of the Environmental Report.

¹ <https://www.gov.uk/government/publications/environment-bill-2020/30-january-2020-environment-bill-2020-policy-statement>

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	change and how this may influence the scale of risk from a particular drought option. Natural England has prepared a Climate Change Adaptation Manual to help partners to identify and support habitats and species to adapt to climate change. This document could be useful when assessing the scale of potential additional risk drought action could have	
Biodiversity, flora and fauna	We note that there is a separate 'Air and Climate' SEA topic area, and the above could equally be included within this topic area. Ultimately, Bristol Water PLC must ensure that climate change risk to sensitive habitats is captured within the SEA baseline, particularly when considering protected sites.	Comment noted and has been considered in baseline review section, including Biodiversity, flora and fauna Future baseline.
Biodiversity, flora and fauna	We are broadly happy with the summary of the Environmental Baseline Review as outlined in Appendix B of the document. However, while the NERC Act Section 41 habitats and species are referred to and listed, which is excellent, it is not clear how these habitats and species will be addressed within the Drought Plan, especially if these habitats and species will be impacted by drought action.	Response has been accepted and text has been added in C1.1 to address this point.
Biodiversity, flora and fauna	Paragraph B.1.1 states the following "...the duration of effects on sensitive features and the reversibility of the effects post drought are important considerations.". While this is very true, Natural England would add that there are particular and significant stressors already acting on the aquatic environments in the South West, even out of drought, and therefore there may be a degree of action that Bristol Water PLC could take on particular habitats prior to drought. If Bristol Water PLC looks at this within their baseline assessment, they may be able to find areas within their Drought Plan area that could provide habitat improvement works to help build resilience and buffer habitats from exacerbated impacts as a result of both drought, and additional abstractions because of drought.	This is the responsibility of Bristol Water and there are no associated changes within the Drought Plan Environmental Report
Water	Natural England advise that water dependant SSSIs, European sites and Ramsar sites will need to be considered within this section of the SEA to ensure that requirements contained within the aforementioned legislation	Response has been accepted, and text has been added to address this point at the appropriate location in section 3.4.1.

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	are met. We mention this as WFD is referenced within this section, but nature conservation designations appear not to be.	
Soil, geology and land use:	Impacts from the Drought Plan should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.	Response has been accepted and text has been added to address a consideration of land use into Section C.5.1.
Soil, geology and land use:	While it may be unlikely that drought action will result in large infrastructure development, this should still be screened out and included within the SEA.	Statement added into Soil, Geology and Land Use Section of the Environmental Baseline Report.
Air and Climate:	Natural England reiterate the comments that we made in reference to climate change adaptation under 'Biodiversity, flora and fauna'. Section B.7 discusses climate change in more detail, but Natural England does not consider that this section fully captures the impacts that climate change could have on water resilience. As we mentioned in our comment on the biodiversity topic area that there is some disparity between the baseline key issues and SEA objectives, we would like to reiterate this comment for 'Air and Climate'. For example, the last baseline key issue mentions "The need to adapt to the impacts of climate change for example through.... specific aspects of natural ecosystems" but there is no mention of natural ecosystems in the SEA objectives. We advise that the need to enhance the resilience of natural ecosystems to climate change prior to drought action for the benefit of wildlife as well as the human population is specifically addressed	It should be noted that this Drought Plan will only cover activity over the next 5 years, and as a result no material change is anticipated to the text.
Air and Climate:	We note that Bristol Water PLC has acknowledged there are current threats due climate change as the paragraph in Section B.7.1 states "The UK Climate Change Risk Assessment (CCRA) 2017 Evidence Report 56 draws together and interprets the evidence gathered by CCRA regarding	SEA Objective 6.3 has been edited to incorporate both the present and future effects of climate change.

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	current and future threats and opportunities for the UK posed by the impacts of climate change up until 2100". However, Table 3.1 has no mention of current issues. This is slightly misleading as it implies that climate change is potentially a future issue. The reality is that we are seeing the effects of climate change now, and all sectors need to acknowledge this and take action, not only in terms of carbon mitigation, but also to actively enhance and adapt ecosystems to tackle the contemporary issues they are facing. We advise that this is expanded on within the Drought Plan's SEA, especially given the risk that climate change puts on water resources and the need to balance sustainable water abstraction with environmental health.	
Air and Climate:	The following may be useful resources that Bristol Water PLC could use in order help with climate change assessments: Committee on Climate Change Net Zero Report ² and the Met Office 2018 UK Climate Predictions (UKCP18) ³	Resources noted but more relevant to WRMP.
Landscape and visual amenity:	The SEA will need to undertake a Landscape and Visual Impact Assessment (LVIA) for any drought options which may result in significant infrastructure development in or in the setting of an Area of Outstanding Natural Beauty (AONB). This will only be necessary if there is any work that may be required as part of the Drought Plan that would influence an AONB.	Response has been noted, but as there will be no significant additional infrastructure within the Mendip Hills AONB arising from implementation of any of the considered options, an LVIA is not considered necessary.
Proposed Framework for Assessment	Natural England has reviewed the proposed assessment framework as outlined in section 3.2 of the Drought Plan Scoping Document. We consider that the proposal seems appropriate and should ensure that all drought options are suitably reviewed against the SEA objectives outlined.	Response has been accepted. Deemed that no action is required.

² <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

³ <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/about>

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	The significance matrix provided in figure 3.1 and explained in paragraph 3.2.1.1 is very clear as is the visual evaluation (VE) matrix provided in table 3.3 and Natural England consider that this will help summarise the results of the SEA very clearly per drought option.	
Proposed Framework for Assessment	Natural England encourages the use of monitoring, within the drought planning process to ensure: that the triggers for demand reduction measures (e.g. temporary use bans) are invoked sufficiently early to adequately protect the reservoir SSSIs, alongside other nature conservation interests; that the nature of unavoidable impacts on the environment are documented and understood to inform future risk forecasting and necessary restoration measures.	Response has been accepted. Deemed that no action is required.
Secondary, Cumulative and Synergistic Environmental Effects	<p>Natural England broadly agree with the cumulative assessments proposed in section 3.2.2 of the Drought Plan scoping document. However, we would advise that the following should also be considered when reviewing the Drought Plan and the options therein:</p> <ul style="list-style-type: none"> - We advise that point 3 (which explains that the Drought Plan will identify any relevant plans and projects that may be in place during the Drought Plan period) also includes Local Authority Plans and reviews how development over the plan period may change local water budgets. - While we acknowledge that the Drought Plan will not directly contribute to the creation of Nature Recovery Networks (NRNs), it is likely that local boroughs and districts will start investing in this work over the coming years, and as such these plans will need to be considered in tandem with any drought action taken. 	<p>Response has been accepted. Text has been updated at Section 3.4 in response to comment.</p> <p>Change in local demand is already considered in the WRMP, which provides the basis for the demand that needs to be met in the Drought Plan over the period of the plan i.e. 2022-2027. However, Local Authority information has been reviewed to consider cumulative impacts with specific options e.g. R24R Well construction activity.</p> <p>After reviewing the Mendip District Council Local Plan we can confirm that there are no existing or planned local policy development proposals in the vicinity of the R24R BH site. Given the predominantly agricultural uses of the surrounding area and the site's relative proximity to the Mendip Hills AONB, and having reviewed the Mendip District Council planning portal, we can additionally confirm that any existing planning applications in the vicinity of the R24R site are small-scale, and include development types such as conversions and change of use applications for existing agricultural buildings.</p>

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Proposed Drought Permits and Supply Augmentation	<p>Based on the information presented at this stage, Natural England concurs with the conclusions of the HRA and SEA screening that the proposed drought permits are unlikely to cause any significant negative effect on any Natura 2000, Ramsar or SSSI. However, we request that the detailed assessment also checks that no SSSI ditch system could be affected as a result of the reduced compensatory flows. We note the potential for these proposals to adversely affect the downstream WFD water bodies that the compensatory flows would normally feed. During the 2012 review of Bristol Water PLC's drought plan we were informed by the Environment Agency (EA) that the baseline ecological data were insufficient to judge the potential impact of stopping the compensatory flows in a drought situation. We defer to the EA's technical opinion on the potential impact of the proposed cessations in compensatory flows on the receiving WFD water bodies, though we note that an environmental report which provides a thorough assessment of current biological and hydrological baselines for these water bodies is not yet available. Measures to protect these river water bodies during a drought will need to be balanced with the needs of the reservoirs which are also SSSI and WFD water bodies. We reiterate this comment from our review of Bristol Water PLC's 2018 drought plan.</p>	Noted and will be considered in the detailed Environmental Assessment Reports.
R24R Well	<p>Regarding the R24R Well supply augmentation measure, based on the information presented, we concur with the initial HRA and SEA conclusions that any negative effects are likely to be sufficiently reduced through mitigation measures. However, these measures will need to be considered in more detail as part of the later HRA and CROW assessments, associated with the planning and permit requirements that will be necessary prior to implementation.</p>	Response to the first point has been accepted.

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	Natural England strongly advises to make it clear in the Drought Plan SEA that supply augmentation measures will only be considered after all demand management measures have been exhausted.	

