

south east water

# Revised Water Resources Management Plan 2020 to 2080

Strategic Environment Assessment  
Environmental Report

Pure know<sub>h<sub>2</sub>ow</sub>

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# 1. Introduction

## 1.1. Introduction

This post adoption statement (PAS) sets out how the strategic environmental assessment (SEA) process, the impacts and mitigation identified and the views of stakeholders have been taken into account in the adopted 2019 Water Resources Management Plan (WRMP) (the Plan), which covers the 60-year period between 2020 and 2080. The WRMP outlines the recommended options to reduce identified deficits in water supply, both by reducing the amount of water that is required and by providing more water.

SEA is required under the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 1633 2004); known as the 'SEA Regulations'. The SEA Regulations implement European Directive 2001/42/EC '*on the assessment of the effects of certain plans and programmes on the environment*', known as the SEA Directive.

SEA is a process for identifying the significant effects of a plan or programme on the environment against a baseline situation. The objective of SEA, as stated in the SEA Directive (Article 1), is '*to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development*'. The SEA Regulations and Directive require that SEA is carried out during the preparation of a plan or programme and before its adoption.

## 1.2. The SEW and WRMP process undertaken

South East Water (SEW) prepared its WRMP between 2012 and 2019, through an iterative process involving the consideration of both individual water resource management options, and combinations of options (termed 'scenarios') which together fulfil the water supply demand over the planning period, alongside SEA. SEA involves an iterative process of collecting information, defining alternatives, identifying environmental effects of those alternatives, identifying environmental effects of the preferred alternatives (and any additional plan or programme proposals), developing mitigation measures and revising proposals in light of the predicted environmental effects.

The WRMP was developed taking account of the SEA findings and considerations such as cost and engineering constraints. The WRMP was published as a draft for consultation (the dWRMP) in February 2018 with the SEA Environmental Report. The Environmental Report also included proposed environmental monitoring as required under the SEA regulations, in order to verify the predicted significant environmental effects of the WRMP and with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

Following a 12-week consultation process, responses were received and analysed, and revisions to the WRMP were made. The revisions were undertaken and assessed between April and September 2018, and a revised WRMP (rWRMP) and SEA Environmental Report were published in September 2018 for further comment prior to finalisation and adoption in August 2019. There were no material changes to the final WRMP compared to the revised WRMP of August 2018.

## 1.3. Purpose of this post-adoption statement

The purpose of this PAS, in accordance with Part 4 of the Environmental Assessment of Plans and Programmes Regulations 2004, is to document how environmental considerations, the views of the

consultees and the recommendations of the Environmental Report have been taken into account in the final WRMP. Therefore, this statement includes the following information in line with the Regulations:

- How the opinions expressed in response to the consultation on the draft WRMP (dWRMP) and revised (rWRMP) and the Environmental Report have been taken into account (section 2);
- how environmental considerations have been integrated into the final WRMP (section 3);
- how the SEA process including the findings of the Environmental Report have been taken into account (section 3);
- the reasons for choosing the WRMP as adopted, in light of the other reasonable alternatives dealt with (also in section 3); and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (section 4).

## 2. How consultation responses were taken into account

### 2.1. Purpose of consultation and engagement

Consultation has been an important part of the development of the WRMP19 and the environmental assessment from the start of the process. The consultation approach has specifically aimed to include ‘engagement’ of stakeholders in the process. Engagement can be defined as the early and open-ended involvement of interested stakeholders in the development of a plan or its assessment. The purpose is to build in their views and opinions, knowledge and advice before particular tasks in plan development are complete. This is a proactive and responsive approach to consultation. In the development of the WRMP19, we have included engagement approaches as part of the consultation.

There are two stages of consultation in SEA: at scoping stage following preparation of the scoping report, and following completion of the Environmental Report. Regarding scoping, the SEA Regulations require that the statutory consultation bodies are consulted at an early stage in the SEA process on the scope and level of detail of the information which must be included in the Environmental Report. The objective of an Environmental Report is to document and to facilitate public and stakeholder consultation on the SEA process. In doing so, it will “*contribute to more transparent decision making and with the aim of ensuring that the information supplied for the assessment is comprehensive and reliable*” (SEA Directive, Preamble par. 15).

### 2.2. Pre-scoping and engagement

An environmental focus group (EFG) was originally set up at the beginning of the WRMP14 process in January 2012 and has been continued for WRMP19 (see below for members of the EFG). The EFG has met regularly from January 2016, and has significantly influenced the process in many ways, for example, helping to shape the criteria used to filter and appraise potential future options.

Environmental focus group (South East Water) (2016/17)	
Basingstoke & Deane Borough Council	National Farmers Union
Bracknell Forest Council	Natural England
Canterbury and District Angling Association	Ouse & Adur Rivers Trust
Consumer Council for Water	Ringmer Parish Council
Council for British Archaeology - South East	RSPB - South East
CPRE (Sussex, Hampshire, Kent)	Rushmoor Borough Council
Customer Challenge Group	Salmon and Trout Association
East Sussex County Council	South Downs National Park Authority
Environment Agency	South East Rivers Trust
Farmer and catchment stakeholder	The Inland Waterways Association
Joint Parishes Group	Wealden District Council
Kent County Council	Whitewater Valley Preservation Society
Lewes District Council	WWF and Blueprint for Water

### **2.3. Consultation: scoping stage**

The SEA Directive requires that a number of statutory bodies are consulted at an early stage in the SEA process on the scope and level of detail of the information which must be included in the Environmental Report. A statutory five-week consultation period on the scoping report, as stipulated within SI2004/1633, was undertaken in May/June 2017. The legislation only requires the scoping report to be sent to statutory organisations; Natural England, Heritage England (previously English Heritage) and the Environment Agency. However, we have also issued the scoping report to the EFG (see above for the organisations within this group) and published the report on our website.

### **2.4. Consultation: draft WRMP and Environmental Report**

A formal consultation period for the SEA environmental report and the dWRMP19 was undertaken over a 12 week period ending in March 2018 and included an extensive engagement programme as detailed in the following paragraphs.

#### **Statutory consultees and stakeholders**

- Formal notifications were issued to our statutory consultees;
- mails were sent out to other interested parties (including a wide range of individuals and organisations including local authorities, parish councils, MPs, environmental groups and business organisations) detailing highlights of the dWRMP, offers of a meeting/discussion, and details of how the plan can be commented on; and
- a joint stakeholder event was held in partnership with Southern Water, Affinity Water, SES Water and Portsmouth Water.

#### **Wider public**

- All dWRMP19 consultation materials and supporting documents were placed on a dedicated page on our website, which included an electronic feedback form. Details of the web page were published on all materials associated with the consultation such as posters, social media posts, newsletters, press releases and emails;
- public exhibitions were held in areas where large and small infrastructure projects were proposed, with locations informed through pre-consultation discussions with the relevant parish councils;
- open days were held at three of our water treatment works, which included presentation of the dWRMP19 proposals and opportunity for attendees to comment; and
- articles and posts were disseminated through our customer magazine and through social media channels including Facebook, Twitter and LinkedIn.

A summary of the key issues raised during consultation are provided in Appendix 1, along with a response detailing how the comment has been addressed within the Environmental Report.

### **2.5. Consultation: revised WRMP (September 2018) and Environmental Report**

The revised WRMP (rWRMP) and Environmental Report was published on our website in September 2018 and statutory stakeholder were invited to comment. No comments requiring any material changes to the WRMP were required and no changes to the Environmental Report were required.

## 3. How the SEA has influenced the Final Plan

### 3.1. SEA process and integration with WRMP development

The SEA process, including the preparation of the Environmental Report, is recognised to be most effective if started early and is closely aligned with the development of the WRMP19. Iteration between the two enables alternatives to be evaluated and refined in the light of understanding of baseline conditions and a preliminary analysis of likely significant effects and potential mitigation measures along with revisions to the proposals.

Figure 3.1 illustrates how the SEA process has been integrated into the WRMP development process using the guideline steps, alongside the five main SEA stages (A-E) as identified in the ODPM 2006<sup>1</sup> and the 2016 United Kingdom Water Industry Research (UKWIR) guidance<sup>2</sup>.

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<sup>1</sup> A Practical Guide to the Strategic Environmental Assessment Directive. ODPM, 2005.

<sup>2</sup> WRMP 2019 Methods – Decision Making Process: Guidelines (Report Ref No 16/WR/02/10, UKWIR 2016)

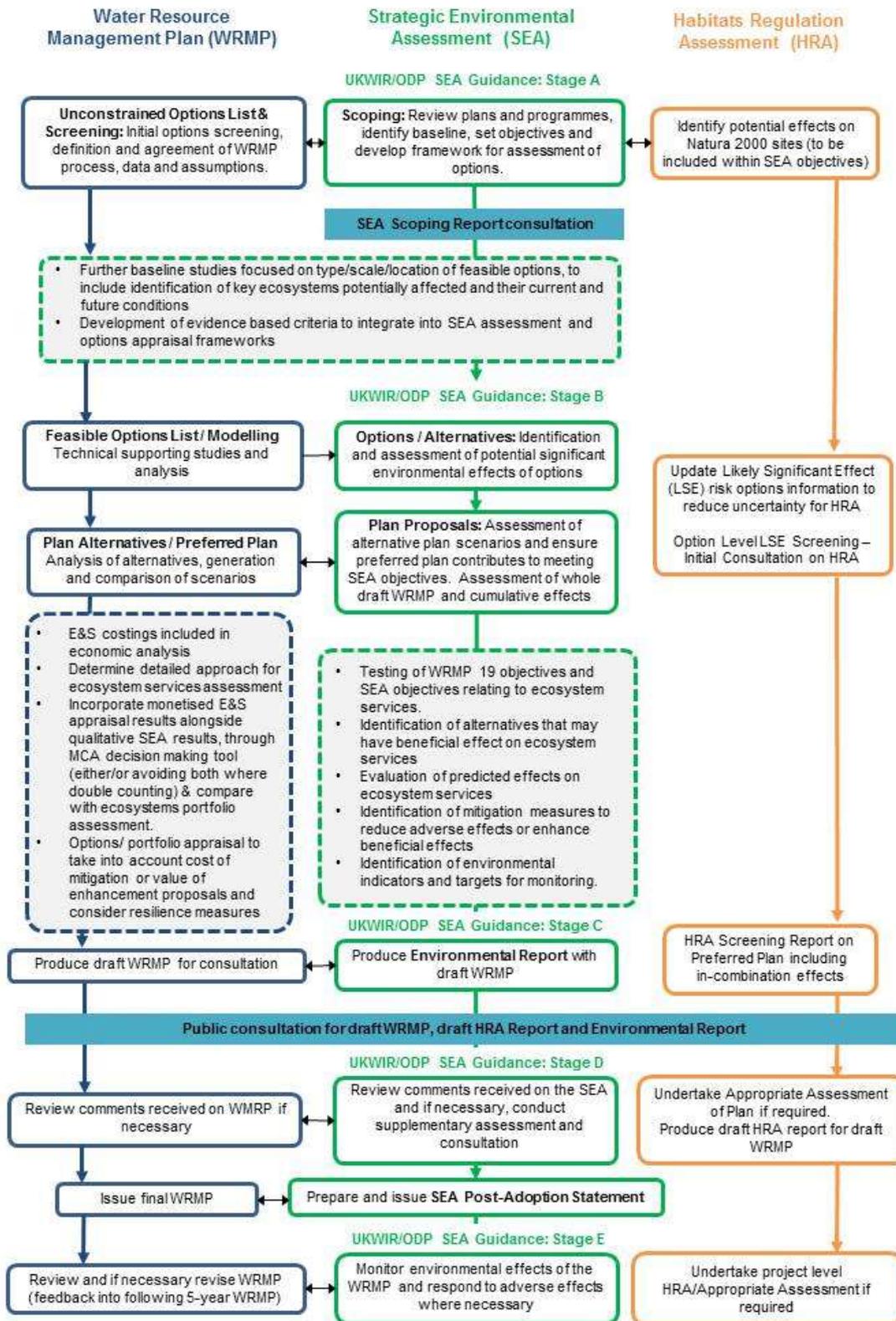


Figure 3.1 Stages of SEA alongside WRMP19 development and HRA

## 3.2. SEA input to alternative options

Figure 3.1 illustrates the stages by which WRMP options were developed and refined and illustrates how SEA was incorporated within this process. Each of the stages of option and plan assessment was influenced through input from the SEA, and this is described in more detail below.

### 3.2.1. Coarse screening

The first stage was the development of an initial options list (the 'unconstrained options list') and progressed through a coarse screening process which identified options with clear 'showstoppers' in terms of resilience, deliverability, promotability or environmental and social acceptability. This screening process then reduced the number of options taken forward for further study (the constrained options list).

Options were considered against the following environmental constraints:

- Nature conservation: ecologically designated areas of international and national importance (special protection areas (SPAs), special areas of conservation (SACs), Ramsar sites, sites of special scientific interest (SSSIs) and national nature reserves (NNRs)
- ancient woodland
- water sources likely to be subject to sustainability reductions in the future based on confirmed high risk
- Water Framework Directive (WFD) water body status where a high risk of deterioration or meeting objectives from an option could be identified with option risks cross checked against the sustainable abstractions review submitted to the Environment Agency in March 2017
- agricultural land classification (ALC) Grade 1 and 2, where there is a high potential for loss of the best and most versatile land (combined with other environmental issues)
- areas of outstanding natural beauty (AONBs) and national parks where visual impacts and/or recreational land loss are expected to be unacceptable
- statutory heritage designations such as world heritage sites (WHS) and scheduled monuments (SMs)
- land uses such as historic landfill sites
- settlements, or strategic infrastructure conflicts
- registered historic parks and gardens, registered battlefields and heritage coast.

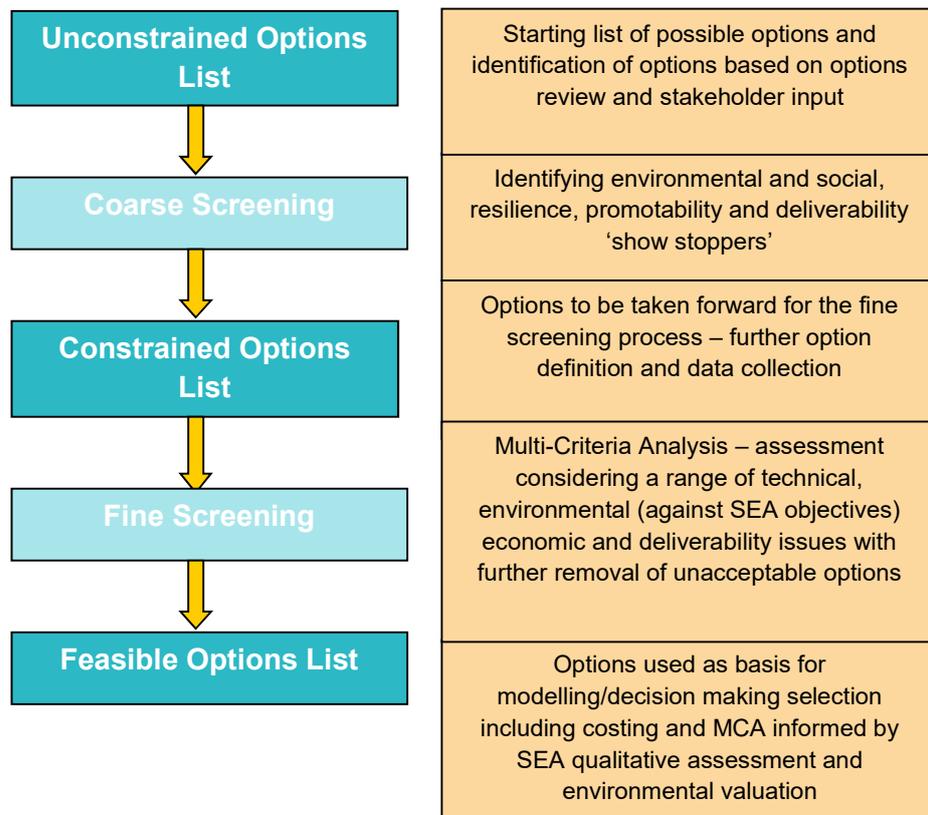


Figure 3.2 WRMP19 screening process

### 3.2.2. Fine screening

Options on the constraints options list were then subject to a fine screening process which involved further data collection and analysis of the options against a range of issues or criteria. An SEA objective led approach was used for a qualitative assessment of the constrained options list, undertaken as part of a multi-criteria analysis (MCA) with options assessed against the same set of overarching principles as used for coarse screening. An environmental resilience risk category was also identified from the fine screening for the remaining feasible options. The risk category allowed recognition that for many options there would be considerable uncertainty over the impact and potential for mitigation, and therefore meant some options were not screened out but instead identified as high risk.

The feasible option list was reviewed by the Environment Agency, Natural England and the EFG during August / September 2017. Feedback received helped us further refine the feasible options list to ensure that only realistic options were taken forward. Reasons for exclusion from the list included insufficient yield, rejection by the EFG, environmental sensitivities and conflicts with other options.

The SEA influenced the fine screening by identifying additional options to be removed from the feasible options list, as an input to the MCA to inform option selection during the modelling and directly by identifying the higher risk options for the modelling. A total of 55 options were removed during fine screening partly or wholly due to environmental issues identified during a high level options assessment against SEA objectives identified at scoping stage and shown below.

### SEA Objectives

1. Protect public health and wellbeing
2. Protect and, where appropriate, enhance built and natural assets and reduce waste
3. Protect and enhance biodiversity and contribute to resilient ecosystems
4. Protect landscapes, townscape and visual amenity
5. Reduce greenhouse gas emissions
6. Contribute to environmental climate change resilience
7. Protect and improve surface water and groundwater status
8. Avoid risk of flooding
9. Protect and, where appropriate, enhance cultural heritage assets
10. Protect quality and function of soils

### 3.2.3. Feasible options

The individual feasible options were assessed further against the SEA objectives identified at the SEA scoping stage (as listed below) in terms of potential effects on the environment based on preliminary design information for the options, baseline data, potential for mitigation and enhancement and degree of uncertainty associated with the assessment.

The fine screening stage of the options appraisal process involved further data collection for the options in the constrained list and further analysis of options against a range of issues or criteria, with the aim to reduce the list further to identify a shorter feasible list of options for more detailed studies.

The assessment for fine screening included three steps:

1. SEA objectives-led approach for a qualitative assessment of the constrained options list. This was undertaken as part of a multi-criteria analysis (MCA) with options assessed against the same set of over-arching principles as used for coarse screening (cost, resilience, feasibility / flexibility, promotability, environmentally / social acceptability) but using quantitative and qualitative assessment. This provided simple high, moderate, and minor scores, both positive and negative, for each objective for the MCA.
2. This assessment identified options likely to be detrimental to environmental resilience. During fine screening, the following options were removed:
  - a) Options considered to have high, difficult to mitigate impacts on designated sites
  - b) options that relied on sources already in WINEP for investigation based on current levels of abstraction
  - c) options likely to cause deterioration for a planned increase in abstraction (this encompassed where lack of available water was reported or the option was considered unsustainable in water abstraction terms).

Screening decisions were recorded within a performance matrix along with a narrative for the basis of the decision.

3. An environmental resilience risk category was also identified from the fine screening assessment for the remaining feasible options. This focused on strategic environmental assessment (SEA) objectives related to the WISER objectives for enhancing the environment and improving resilience and avoided double counting with the environmental and social costings within the feasible options costing. The risk category allowed recognition that for many options there would be considerable uncertainty over the impact and potential for mitigation, and therefore meant some options were not screened out but instead identified as high risk.

The feasible option list was reviewed by the Environment Agency, Natural England and the EFG during August / September 2017. Feedback received helped us further refine the feasible options list to ensure that only realistic options were taken forward. Reasons for exclusion from the list included insufficient yield, rejection by the EFG, environmental sensitivities and conflicts with other options.

The SEA influenced the fine screening by identifying additional options to be removed from the feasible options list, as an input to the MCA to inform option selection during the modelling and directly by identifying the higher risk options for the modelling. In total, 55 options were removed from consideration during fine screening either partly or wholly due to environmental issues identified through the high level options assessment against the SEA objectives.

### **3.3. SEA input to alternative plan scenarios**

The WRMP process involves identifying combinations of options that can together meet water supply demand over the planning period. Part of this involves predicting the both the baseline supply and forecasting demand to provide a realistic basis for determining the additional resources required through modelling. A bespoke modelling tool based on economics of balancing supply and demand (EBSM) was used to support decision making by optimising the timing and combination of options against the different scenarios considered. The modelling and decision making process is described in detail in the WRMP19.

Fourteen key scenarios were assessed in the SEA. These scenarios considered within the SEA varied in terms of:

- The level of drought from 'worst historic' (1:100 or one per cent annual probability of occurring) to 'severe' drought (1:200 or 0.5 per cent annual probability of occurring);
- the extent and timing of sustainability reductions to 2030 or 2035, and whether they were based on the extreme case (taking the Environment Agency modelled results, and assuming all would be required) or a more likely level (based on experience of WINEP investigations to date and our own review of the sustainability risk for their existing abstractions);
- inclusion or not of high risk environmental options, or imposition of timing restrictions to the model to reflect the risk and requirement for additional time for further studies or due to cumulative impact concerns; and
- degree of priority given to leakage and water efficiency to reflect national targets, customer preferences and SEA objectives.

The MCA scoring of options and environmental and social costings (as described under 'Fine Screening' above) were used within the model to reflect environmental assessment undertaken, and also to track how moving from the least cost plans to a best value plan improved the overall MCA score and environmental and social costs (including carbon costs). In addition, the options assessment for the MCA was used as a basis for assigning high (red) medium (amber) and low (green) environmental risk categories to each option to provide a way to input directly into generation

of options for different scenarios. The risk categories were focused on risk in terms of environmental resilience, reflecting the importance given to this aspect in the water industry strategic environmental requirements (WISER) document.

The input to the modelling was undertaken through an iterative process with the analysis of each model scenario feeding back into further model runs. The starting point was to exclude all options identified as high risk environmental resilience or 'red' options. This was followed by further subsequent SEA runs keeping the high risk options out where this allowed the demand to be met, but also aiming to improve the balance and minimise the overall environmental risk for the combined portfolio of options by constraining higher risk options to the latter end of the planning period in order to provide time for new treatment options to emerge and to investigate alternative options and variants to avoid adverse impacts on designated sites. The assessment of the plan scenarios included a more detailed analysis based on individual option assessment matrices and cumulative assessment.

This approach avoided double counting with the environmental, social and carbon costs already included in the modelled costs particularly with respects to carbon and traffic impacts.

### **3.4. SEA influence on the selection of the WRMP preferred plan**

#### **3.4.1. Development of the dWRMP**

The alternative plan scenarios were compared against the SEA objectives (as shown in section 3.2.2), based on the individual environmental assessments for each option, the potential for mitigation and residual effects and considering the cumulative impacts for the combined options. The full scenario comparison assessment is provided in Table 7.7, chapter 7 of the Environmental Report. The dWRMP was found to have reduced risk of disruption to road infrastructure and agricultural land relative to other key scenarios due to significantly reduced requirement for options requiring significant lengths of pipeline installation.

The Environmental Report assessed the preferred plan in terms of potential environmental effects, including cumulative impacts within plan and identified the mitigation measures required and general approach needed to continue to review proposed schemes and consider alternatives and consult with stakeholders. The commitment to this approach is incorporated in the Environmental Action Plan (section 4).

#### **3.4.2. Development of the rWRMP**

Regulatory responses received during consultation on our dWRMP identified the requirement to meet the 15% leakage target included within the Government's 'A Green Future: Our 25 Year Environment Plan'<sup>3</sup>. Therefore, additional modelling was undertaken to further consider this the 15 per cent leakage reduction (from current baseline levels), and also to determine the implications of achieving 50 per cent leakage reductions by the end of the supply period (2090), as an additional scenario for consideration (the rWRMP). In addition, a number of amendments to proposed pipeline routes for options included within the rWRMP were made in order to minimise potential adverse impacts on environmental receptors identified during assessment of the dWRMP.

Relative to the dWRMP there is increased potential requirement construction works along the network, which could have effects on road users with potential for increased traffic congestion and air quality issues, but the potential benefits outweigh these consequences in the long term as number of major new schemes identified as high risk through the SEA are no longer required. This includes seven company or regional transfers, one conjunctive use scheme, three desalination schemes, three effluent reuse schemes, three groundwater and one surface water abstraction schemes and one reservoir.

Overall, the rWRMP compares favourably with other scenarios as a result of:

- No effluent re-use schemes, desalination schemes or new groundwater abstraction schemes resulting in reduced waste production potential;
- reduced requirement for construction of new schemes, including pipelines and transfers, and subsequent potential impacts on landscapes; and
- improved resilience through increased water savings and reduced reliance on rivers and groundwater while increasing source diversity.

From the options included within the dWRMP but discarded from the rWRMP, three have been retained as plan alternatives in the event that one or more of the higher risk options included within the rWRMP cannot be progressed. This includes one reservoir option, one regional transfer option and one water re-use option.

### **3.4.3. Summary**

Overall the SEA influenced:

- Identification and development of options;
- iterative improvements to outline option design and costing to reduce potential environmental impacts;
- selection of options for consideration in the plan scenarios;
- scenario development and plan selection; and
- identification of a range of mitigation measures and recommendations for further study to reduce potential impacts of the plan.

The process for taking forward the mitigation measures identified and the recommendations for further study are all incorporated into the SEA monitoring plan and environmental action plan (see section 4).

## 4. Implementation and Monitoring

### 4.1. Objectives, targets and indicators

The SEA regulations require that the significant environmental effects of the implementation of plans and programmes are monitored to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action. The Environmental Report is also required to provide a monitoring plan describing how the requirement to monitor will be implemented (Stage E).

In order to meet this requirement one or more indicators and targets have been set for each SEA objective, as set out in Table 4.1 below. These will provide the basis for monitoring the effects of the plan against the objectives following implementation.

### 4.2. Monitoring plan

The purpose of the monitoring plan is to enable us to take a proactive approach in reviewing the anticipated impacts of the WRMP and to undertake additional mitigation where required. It also encourages continual improvement towards the SEA objectives. Monitoring results will provide information that can be used to inform the SEA during the next WRMP review (WRMP24). It should be noted that the targets accompanying the indicators refer to the environmental effects of the options following the implementation of any required mitigation measures, rather than the effects associated with ‘unmitigated’ options.

In most cases more detailed baseline collection and project studies will be required in order to confirm the significance of environmental effects and ensure appropriate mitigation is included as part of the option design. Option mitigation and monitoring arrangements proposed in the Environmental Report will need to be reviewed in the light of the findings of the detailed studies and this process is captured in the Environmental Action Plan described in table 4.2.

The monitoring plan has been updated to reflect the company’s performance commitments and outcome delivery incentives published in the PR19 final determinations: South East Water – outcomes performance commitment appendix (December 2019).

**Table 4.1 Monitoring plan**

Targets	Indicators
<b>Objective 1:</b> Protect public health and promote wellbeing	
<b>SEA topics:</b> Population and human health	
T.1 Maintain and improve access to affordable, reliable drinking water meeting forecast demand	<b>Annual Reporting on environmental indicators in Performance, People and Planet Report</b>  Customer satisfaction monitoring Value for money Level of service Cost per litre. Supply disruptions, taste, odour, colour etc.
T.2 Improve water affordability for vulnerable groups/ customers.	
T.3 Improve water access for vulnerable groups and general public.	

Targets	Indicators
	<p>Customer Measure of experience (C-MeX)</p> <p>Vulnerable households monitoring including the following measures:</p> <ul style="list-style-type: none"> <li>- Satisfaction of household customers who are experiencing payment difficulties.</li> <li>- Satisfaction of household customers who are receiving, or applying for, non-financial support</li> <li>- Satisfaction of household customers on our vulnerability schemes during a supply interruption</li> <li>- Priority Services for customers in vulnerable circumstances – reach, attempted contacts, actual contacts</li> </ul>
<p>T.4 Minimise extent and period of disruption to traffic related to construction and maintenance.</p>	<p><b>Annual Reporting on environmental indicators in Performance, People and Planet Report:</b></p> <p><b>Add to annual reporting</b></p> <p>Number of repair and maintenance works and mains laying schemes where we have successfully shared a trench with other utilities thereby minimising disruption in the long term</p> <p>Numbers of planned road/lane closures we had and how many of those were completed on time</p>
<p>T.5 Minimise, access restrictions and noise disturbance to people and their private assets from construction and operation of schemes</p>	<p><b>Annual Reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>Number of complaints received</p> <p><b>Scheme monitoring</b></p> <p>Proactive approach taken to communications planning for all construction and operational projects</p>
<p>T.6a No net permanent loss of important recreational amenity</p> <p>T.6b Minimise extent and period of temporary disruption to public open space areas related to construction and maintenance</p>	<p><b>Scheme monitoring</b></p> <p>Public footpath/cycleway affected by works</p>
<p>T.7 Generation of new recreational facilities.</p>	<p><b>Scheme monitoring</b></p> <p>Account taken of local views on new recreation provision</p>
<p><b>Objective 2:</b> Protect, and where appropriate enhance, built and natural assets and reduce waste</p>	
<p><b>SEA topics:</b> Material assets</p>	
<p>T.8 Minimise material consumption and waste during construction and operation of schemes.</p>	<p><b>Scheme monitoring</b></p> <p>Materials and waste plans for schemes including identifying:</p>

Targets	Indicators
	<p>Tonnes construction waste sent to landfill as a proportion of total waste produced</p> <p>Tonnes construction waste recycled on-site and off-site as a proportion of total waste produced</p>
T.9 No water treatment sludge sent to landfill	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>% tonnes sludge reused or recycled</p>
<b>Objective 3:</b> Protect and enhance biodiversity and contribute to resilient ecosystems	
<b>SEA topics:</b> Biodiversity, flora and fauna	
T.12 No adverse effect on integrity of European (Natura 2000 and Ramsar), national or regional level designation, and where feasible seek to contribute to achieving favourable conservation status	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>Condition status of South East Water's sites of special scientific interest (SSSIs) is reported</p> <p><b>Scheme monitoring</b></p> <p>Area of each designated site/ type affected, and likely impact</p> <p>Actions taken to avoid, mitigate or compensate impact</p>
T.13 Biodiversity net gain	<p><b>Scheme monitoring</b></p> <p>Area m2 of habitat lost or enhanced including; woodland and hedgerow planting, heathland creation, hibernacula built and areas of Invasive Non-native Species (INNS) control</p> <p>Reporting on net gain at scheme and plan level (using above metric) and development of a tracking tool to capture net gain</p>
T.14 No reduction in ecological value of rivers including fish migration	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>Progress on delivery of Water industry national environmental programme (WINEP) reporting on delivery of no deterioration WFD measures and catchment investigations and interventions</p>
<b>Objective 4:</b> Protect landscapes, townscapes and visual amenity	
<b>SEA topics:</b> Landscape, cultural heritage, material assets	
T.15 long term maintenance of landscape quality through landscape design and mitigation and enhancement	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Annual Report</b></p> <p>Number of schemes in designated landscapes planned or under construction</p> <p><b>Scheme monitoring</b></p>

Targets	Indicators
	<p>Development of protected landscape and biodiversity strategies to guide work in areas of outstanding natural beauty (AONBs) and national parks</p> <p>Land use/landscape features re-establishment monitoring over appropriate period - areas//km successfully restored to meet strategy requirements e.g. no of trees planted or hedge length</p>
T.16 Agree design standards with AONB management units and South Downs National Park authority	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Annual Report</b></p> <p>Number of schemes using agreed design standards</p>
<b>Objective 5: Reduce greenhouse gas emissions</b>	
<b>SEA topics:</b> Climatic factors	
T.17 Minimise carbon emissions from construction	<p><b>Scheme monitoring</b></p> <p>Schemes including reviews of carbon footprint (total tonnes) of construction and any action taken to reduce embedded carbon e.g. linked to waste reduction, transport choices, material etc</p>
T.18 Increase use of renewable/low carbon energy sources in new schemes	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>Net annual operational greenhouse gas emissions taking account of renewable energy use and offsetting</p>
T.19 Minimise the annual carbon emissions from operation (tonnes and t/Ml).	<p><b>Add to annual reporting</b></p> <p>Carbon footprint (total tonnes) per year, predicted over plan period</p>
<b>Objective 6: Contribute to environmental climate change resilience</b>	
<b>SEA topics:</b> Climatic factors, population and human health, biodiversity, water	
T.20 Improve resiliency of the environment to climate change	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>WINEP implementation</p> <p><b>Add to annual reporting</b></p> <p>Balance of vulnerable and resilient water resources</p> <p>Water industry strategic environmental requirements (WISER) document indicator monitoring for enhancing environment and supply resilience</p>
<b>Objective 7. Protect and improve surface water and groundwater status</b>	
<b>SEA topics:</b> water, climatic factors, biodiversity	

Targets	Indicators
<p>T.21 Contribute to achieving WFD quality/resource objectives for surface water bodies and groundwater used for supply.</p>	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>WINEP implementation reporting</p> <p>Area of land within catchment management initiatives to improve catchment resilience to raw water quality deterioration</p> <p>Engagement with abstractors to improve resilience to low flows</p> <p><b>Add to annual reporting and scheme monitoring</b></p> <p>Additional monitoring for relevant WRMP schemes agreed with the Environment Agency with respect to no deterioration or improvement objectives identified (where this is not already addressed through WINEP)</p>
<p><b>Objective 8: Avoid flood risk</b></p>	
<p><b>SEA Topics:</b> Water, population and human health, climatic factors</p>	
<p>T.22 No net flood plain area (ha) lost as a result of this plan, and where possible increase functioning flood plain</p>	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>Sites vulnerable to 1:200 flood risk</p> <p><b>Scheme monitoring</b></p> <p>Reduced groundwater flood risk</p> <p>Loss of flood plain of action taken to avoid or minimise compensation required or increased storage/ retention provided</p>
<p><b>Objective 9: Protect and, where appropriate, enhance cultural heritage assets</b></p>	
<p><b>SEA Topics:</b> Cultural heritage, material assets, landscape</p>	
<p>T.23 Avoid impact on cultural heritage designated sites and settings and to minimise risks to buried archaeology/palaeo-environmental remains.</p>	<p><b>Add to annual reporting</b></p> <p>Development of standard approach on addressing archaeological risk on projects underway and to be adopted</p> <p><b>Scheme monitoring</b></p> <p>Case study reporting on approach to cultural heritage and actions taken to investigate cultural heritage and avoid impacts this can include reporting on:</p> <p>Identification of cultural heritage assets affected or avoided including setting and access impacts.</p> <p>Identification of action taken to investigate potential interest and any positive measure taken to provide interpretation, improve access, record or incorporate cultural heritage aspects in scheme.</p> <p>Extent of re-routing or re-siting to avoid impacts and additional pipeline or additional cost</p>

Targets	Indicators
<b>Objective 10. Protect quality and function of soils</b>	
<b>SEA Topics:</b> Soils, biodiversity, flora and fauna, landscape, water	
T.24 No net loss of geological SSSI	<p><b>Scheme monitoring</b></p> <p>Report in scheme case studies if any adverse effects on geological SSSI affected by water resource options or actions taken to avoid impacts</p>
T.25 Minimum disturbance or loss of high quality land as a result of this plan and minimal net loss of soil resources.	<p><b>Annual reporting on environmental indicators in Performance, People and Planet Report</b></p> <p>Area of land subject to catchment management involving soil improvement, pesticide reduction or sediment retention</p> <p><b>Scheme monitoring</b></p> <p>Scheme reporting on agricultural land loss of best and most versatile land and use of scheme soil resources - or area of contaminated land remediated - reporting through case studies in annual reports.</p>

### 4.3. Environmental action plan

As part of taking the WRMP forward to implementation, schemes will be subject to more detailed design and feasibility studies and environmental assessments taking account of detailed consultation with local planning authorities and statutory and non-statutory consultees, as relevant. We are committed to continuing the engagement with stakeholders and this commitment is reflected in an Environmental Action Plan, as described below.

In addition to monitoring, there are a number of plan-related actions required to ensure findings from the SEA are taken forward. This includes linking the SEA findings and recommendations to the Business Plan to ensure the SEA requirements for the plan and the options implementation over the next five year period is supported with appropriate funding for monitoring, further environmental studies and mitigation.

The EAP will be assisted by ensuring that as individual schemes are brought forward for implementation, they are reviewed using the information from the SEA process (such as the option dossiers and individual option SEA assessments). This will include the baseline information, the design assumptions and mitigation measures and further studies recommended. To facilitate this, the process for project initiation will be updated to ensure that all Project Identification Documents (PID) will include the relevant SEA and options dossier information. The key short term and long term actions are identified in the Environmental Action Plan in Table 4.2. All projects will be subject to a review to determine appropriate level of additional consultation, environmental survey and assessment needed. Table 4.2 Environmental action plan Including update on WRMP14

Reference number	Action from WRMP14	Target	Monitoring
<b>Short term (during next five years) 2020-2025</b>			

Reference number	Action from WRMP14	Target	Monitoring
EAP1	<p>Robust procedures for developing projects and incorporating SEA findings and mitigation requirements</p> <p>Procedural actions from WRMP14 are fully in place including a direct link for the PID to the option dossiers produced for the SEA/ WRMP to ensure any design works improves the environmental impact in the dossier rather than going backwards. Schemes are now fully linked to relevant enabling works and potential interactions with other schemes from the cumulative effects assessment in the SEA.</p> <p>Develop scheme monitoring plans as part of process for taking SEA requirements forward taking account of monitoring data already collected and where additional information is needed.</p> <p>Further action to be taken: develop approach for emergency or quick response actions on leakage reduction to flag sensitive sites, develop working procedures for sensitive sites</p>	All schemes reviewed taking into account any assumptions and mitigation and further identified through the SEA	<i>Update as part of annual report input and use as input into next WRMP and SEA</i>
EAP2	<p>Reference to Natural England's Standing Advice for Protected Species identified in WRMP14 and this is being developed further to include tailored guidance for South East Water activities</p> <p>South East Water has an organisational licence with Natural England for addressing protected species across projects in a consistent and clear way. This will be maintained going forward.</p> <p>Capacity building training for good environmental practice within the internal environment team is in progress and will continue to be rolled out and developed to support project and operational work and to increase awareness of environmental issues across teams.</p>		
EAP3	<p>Links to the WRMP14 SEA findings and recommendations were incorporated into the South East Water Business Plan with the additional studies undertaken on Broad Oak reservoir, new Arlington reservoir and Peacehaven - these were undertaken and fed into the WRMP19 SEA.</p>	Linking into to delivery and funding through the Business Plan	
EAP4	<p>Take account of WISER and Environment Agency valuation document recommendations related to valuing environment and integrating this further in decision making - explore taking forward the natural capital accounting and ecosystems services assessment approaches.</p> <p>Develop the valuation framework used in the WRMP as a starting point to provide more complete</p>	Coordinated valuation approach in decision making and integrate consistent approach across programmes and business plan	

Reference number	Action from WRMP14	Target	Monitoring
	<p>environmental valuation for water resources and demand management and consider integrating in other work streams e.g. to value benefits of water savings, sustainability reductions and options appraisal.</p>		
EAP5	<p>Implement the schemes as outlined in the rWRMP19 to 2025 with SEA taken into account.</p>	<p>Schemes implemented within asset management period take on board relevant environmental information and assessment from SEA and meet WINEP sustainability reduction commitments</p>	
EAP6	<p>Develop additional mitigation for cumulative impacts including protected landscape mitigation in consultation with the AONB units, South Downs National Park authority and other stakeholders. Link to studies on chalk grassland restoration and effective approaches.</p> <p>Undertake consultation on programme of works and interactions or combined effects from other company schemes.</p>	<p>Approaches and mitigation for cumulative landscape impacts and habitat impacts, water framework impacts to be taken into account as individual schemes are developed.</p>	
EAP7	<p>Undertake further studies on the preferred plan schemes 2020- 2045 including preparation for planning consents:</p> <ul style="list-style-type: none"> <li>• Broad Oak reservoir</li> <li>• new Arlington reservoir</li> <li>• pipeline transfers</li> </ul> <p>Including:</p> <ul style="list-style-type: none"> <li>• Developing the baseline information and undertaking additional water quality monitoring</li> <li>• detailed studies on option variants, pipeline routing (e.g. use approach applied to Peacehaven pipeline routing) along with further comparison with relevant alternatives</li> <li>• identify possible interaction with other potential schemes and include in overall studies – to ensure opportunities and constraints are covered</li> <li>• mitigation and enhancement studies including consultation with local stakeholders for example on recreation provision at new reservoirs</li> <li>• water framework directive assessment where potential to cause deterioration needs to be ruled out and opportunities for contribution to WFD objectives of RBMP measures. Link to relevant WINEP studies and potential for conjunctive operation for overall benefit</li> </ul>	<p>Develop best environmental solutions considered with mitigation built into design and costing, and opportunities for enhancement are included in option design through consultation with relevant stakeholders</p> <p>Schemes designed so no significant effects on SSSIs</p> <p>Schemes are designed and operated so no deterioration of ecological WFD status or contribute to RBMP measures</p>	

Reference number	Action from WRMP14	Target	Monitoring
	<ul style="list-style-type: none"> <li>work with the Environment Agency on options for Broad Oak with the Richborough connection design constraint on WFD mitigation.</li> <li>undertaken further yield assessment studies for the reservoirs taking account of other schemes and potential cumulative effects /opportunities with other schemes</li> <li>develop monitoring plans for WFD compliance where relevant liaising with the Environment Agency.</li> </ul>		
EAP8	Implementation of WINEP restoring sustainable abstraction programme. Review the output of this programme and keep implications for future WRMPs under review. Identify schemes which may be at risk of future sustainability reductions.	AMP7 WINEP will be within the South East Water business plan.	
EAP9	Review Annual Reporting People Places and Planet and add additional monitoring or reporting to address monitoring plan and include case studies for schemes to report on progress and how environmental impacts are addressed and any changes to future approaches recommended. Feed into lessons learned for the next WRMP	Annual monitoring as part of WRMP review and reporting within five year WRMP cycle.	
EAP10	<p>Complete case study report to contribute to monitoring feedback on 2015 to 2020 projects - through annual report</p> <ul style="list-style-type: none"> <li>Coggins Mill – currently subject to sustainability studies</li> <li>Forest Row - currently subject to sustainability studies</li> </ul>	Feedback on completed or ongoing schemes is reported.	
EAP11	<p>Complete monitoring of time limited licences at:</p> <ul style="list-style-type: none"> <li>White Waltham</li> <li>Eridge</li> <li>Saints Hill - monitoring and options review required</li> <li>Lilly Farm</li> <li>Oakhanger</li> <li>Bewl Groundwater and Witchling</li> </ul>	Feedback on time limited licences provided	
<b>Medium to long term (5-25 years) 2026-45</b>			
EAP12	Undertake the down the line assessments required in the Habitat Regulations Assessment (HRA) on options identified and their potential alternatives.	HRA issues addressed and schemes taken forward avoid significant adverse effects on Natura 2000 and Ramsar protected sites.	<i>Update as required leading up to next cycle.</i>

Reference number	Action from WRMP14	Target	Monitoring
EAP13	<p>Review the SEA objectives and targets as part of lessons learned for next WRMP cycle and update baseline.</p> <p>Feed information gathered through studies into the next cycle of options identification and appraisal.</p>	<p>SEA objectives, baseline and option assumptions reviewed as part of next WRMP cycle and more developed options for consideration - to reduce assessment and delivery risk.</p>	<p><i>Update as required leading up to next cycle.</i></p>

## 5. Conclusions

Environmental assessment has played a key role in the development of the WRMP19 from initial options development through to agreement of the final plan. Environmental assessment was included from the start of the options selection and appraisal process and from over 510 options, 175 were selected as potential feasible options for the plan based largely on removing options performing poorly against environmental objectives within each of the option type groups. These options taken forward were developed further and assessed more fully against the SEA objectives and criteria to identify potential significant effects and mitigation requirements. Each option was also given an environmental risk level that was used to influence the least cost scenarios modelled. The scenario selected for the dWRMP benefitted from reduced potential for disruption to road traffic infrastructure and agricultural land relative to other scenarios considered due to the significantly reduced requirement for options involving significant lengths of pipeline. Regulator response during consultation on the draft dWRMP identified a requirement to meet the 15 per cent leakage reduction target identified in the Government's 'A Green Future: Our 25 Year Environment Plan<sup>31</sup>' and also to determine the implications of achieving 50 per cent leakage reductions by the end of the supply period. Additional modelling was undertaken and presented as a further scenario, the rWRMP.

The rWRMP requires increased construction works along the network relative to the dWRMP, which could have effects on road users with potential for increased traffic congestion and air quality issues related to this. However, potential benefits are considered to outweigh these consequences in the long term as number of major new schemes included within the dWRMP which were identified as high risk through the SEA were no longer required in the rWRMP. The SEA identified a range of mitigation measures and recommendations for further study to reduce potential impacts of the plan. These have been incorporated into the SEA monitoring plan and environmental action plan. They will also be used to ensure SEA findings are taken forward as part of the plan implementation, to provide additional information on the baseline environment and scheme environmental impacts to feed into future plan development.

# Appendix 1: Consultation Comments on Environmental Report

Key issues/themes raised	SEA response
Statutory consultees	
<p>The Water Framework Directive (WFD) assessment should detail impacts on multiple waterbodies where appropriate, include quantitative assessment of hydrological regime and ensure target aquifers assessed for new groundwater options are correct. Water reuse schemes should be considered moderate risk.</p>	<p>The WFD assessment summary has been amended to incorporate all the relevant waterbodies identified in our working tables other than those relating to pipeline crossings as at this stage a standard construction approach is identified but individual assessment will be undertaken for project development.</p> <p>The Peacehaven water reuse scheme has been considered moderate risk following a change in proposed treatment processes from reverse osmosis to conventional treatment (with a relatively small component of reverse osmosis). Quantitative hydrological assessment is not considered appropriate at this stage of option development. Mitigation proposals set out in the SEA and WFD assessment detail further studies that would be undertaken as part of option progression, including quantitative hydrological assessment where necessary and our commitment to develop monitoring plans for each scheme addressing WFD aspects where appropriate has been clarified.</p>
<p>The water reuse options at Peacehaven and the Medway should not be developed further unless an alternative location for the brine disposal can be identified. In addition, potential impacts of reduced volumes in receiving waters should be considered</p>	<p>The water reuse scheme at the Medway has been excluded from the rWRMP. The water reuse scheme at Peacehaven has been included as a plan alternative option should the new Arlington reservoir option prove unfeasible. Detailed further ecological and hydrological studies would be undertaken during the development of this option to ensure it can be implemented without generating unacceptable adverse impacts on the environment. This would include consideration of alternative discharge arrangements. The waste water treatment plant at Peacehaven currently discharges to sea, so no adverse impact on receiving waters as a result of reduced flows is anticipated. The treatment process for the Peacehaven water reuse scheme only includes a small element of reverse osmosis treatment and a reduced production of brine effluent. It may therefore allow for a greater range of options for brine disposal but further studies will be undertaken to address environmental concerns related to this.</p>
<p>Further information is required on how current and future sustainability reductions have been considered</p>	<p>Existing sustainability reductions have been addressed through the WINEP process and the plan takes account of future sustainability reductions and</p>

Key issues/themes raised	SEA response
	tests sensitivity to possible future sustainability reductions. We are committed to not growing current sources until sustainability assessments have been completed to avoid future WFD status deterioration related to existing sources.
The WFD assessment should take into account planned growth of existing sources, cumulative impacts of growth and new options and options which indirectly increase licence uptake	No further increases in abstraction beyond the stated planned increases are anticipated.
The transfer option from Bewl Water Treatment Works (WTW) should take into account any requirements of the Pevensey Levels water level management plan and the impact of additional abstraction from Bewl under the Bewl Bridge Water Treatment Works expansion option has not been assessed	The WTW option which includes a transfer from Bewl WTW replaces a raw water transfer with a treated water transfer and there would be no releases to the water courses connected to the Pevensey Levels. The transfer option removes the existing INNS risk from the raw water transfer. There is no additional abstraction from Bewl planned. The Bewl Bridge Water Treatment Works option has been excluded from the rWRMP19, however it does not include additional abstraction from Bewl.
Further detail regarding environmental monitoring should be provided, and the company should monitor WFD deterioration	High level monitoring proposals are set out in chapter nine. More detailed monitoring measures would be developed as option design progresses and further studies are undertaken. There is a commitment to develop scheme monitoring plans.
Concerns regarding impacts of desalination schemes on terrestrial and marine protected sites	These options have been excluded from the rWRMP.
More detail is required regarding screening of impacts on (SSSI)	Further detail regarding the SSSI screening process provided in Appendix G and summarised in section 8.8.2 of the Environmental Report (ER).
Opportunities to contribute to Natural England's woodland and downland focus areas should be considered	This suggestion has been incorporated into proposed mitigation for the rWRMP19 options where appropriate.
The plan should contribute to net biodiversity gain, and should consider mitigation/enhancement for all habitats and species whether protected or not	Our commitment to net biodiversity gain and mitigation/enhancement measures for habitats and species that are not protected under EU or UK law has been incorporated into the SEA mitigation as set out in section 8.6.3 of the ER.
A separate marine conservation zone (MCZ) assessment should be undertaken	A MCZ assessment has been undertaken. The results of the assessment are summarised in section. <b>Error! Reference source not found.</b> of the ER.
Other stakeholders and members of the public	
General support for Broad Oak reservoir, however several specific areas of concern including: <ul style="list-style-type: none"> <li>• suitability of access via Barnet's Lane</li> </ul>	Projected population increases within the study area were taken into account during development of the supply demand balance for the area. The Broad Oak reservoir involves abstraction during winter high flow

Key issues/themes raised	SEA response
<ul style="list-style-type: none"> <li>• whether size of reservoir is sufficient for projected population increase</li> <li>• impact on the Sarre Penne</li> <li>• impact on the Stour Stream if reservoir filled during dry winters</li> <li>• provision of recreational facilities at the reservoir site</li> </ul>	<p>at Plucks Gutter and abstraction during low flows such as during dry winters would be limited by licence restrictions. Abstraction from the Stour would only take place when water levels are considered high enough during winter months.</p> <p>Recreational facilities planned for the site will support informal recreational activities and include improvements to cycleways in and linking to the site, as well as footpaths and bridleways. A recreational plan will be developed with the local community to identify future recreational provision at the site. Access suitability will be considered in detail as part of this plan.</p> <p>The WFD assessment (Appendix F) identifies a requirement for further study into the potential impacts of the scheme on the Sarre Penne. It is likely that a WFD derogation would be required in order to allow the scheme to progress with the constraints of the Richborough Connection scheme.</p>
<p>General support for Arlington reservoir, but requests for improvement to accessibility and existing recreational facilities and visual impact for nearby houses</p>	<p>The SEA has identified the need for mitigation for the loss of a public right of way within the footprint of the proposed new reservoir and for the visual impact of the new reservoir. These issues, and potential further enhancements to public access and recreational facilities on the site, will be the subject of further study and consultation as the option design progresses.</p>
<p>Continuation of abstraction from Greywell Fens until 2025</p>	<p>We are currently investigating how best to make the necessary distribution upgrades whilst minimising impacts on the affected wetland site of special scientific interest (SSSI). This will be completed as quickly as possible, however we currently anticipate ceasing abstraction from Greywell Fens in 2023.</p>
<p>Increased abstraction from River Cuckmere</p>	<p>There are no options within the rWRMP that involve new or increased abstraction from the Cuckmere.</p>
<p>Potential increase in traffic through Eccles</p>	<p>No traffic increases are anticipated as a result of the construction or operation of options included within the rWRMP.</p>
<p>Loss of high quality agricultural land at Peacehaven and visual impact of new infrastructure</p>	<p>Peacehaven scheme is now an alternative scheme for the rWRMP. The SEA proposes that the design of the new plant is agreed with South Downs National Park authority to ensure that it is in keeping with this sensitive landscape area. There may be a small amount of loss of best and most versatile (BMV) soils during construction of the plant, however the land is not currently under agricultural use.</p>
<p>Query whether the proposed landscape protection strategies will cover both designated and undesignated landscapes</p>	<p>The proposed landscape protection strategies refer primarily to designated landscapes, however specific mitigation has been identified for undesignated landscapes and the principles derived from the</p>

Key issues/themes raised	SEA response
	protected landscape strategies would be applied more widely and will be linked to biodiversity and cultural heritage.
Impact of proposed new surface water (particularly chalk streams) and groundwater abstractions	The rWRMP19 relies more heavily on leakage reductions and water efficiency measures than the dWRMP19, minimising the impact on environmental sources. Overall the preferred plan improves resilience and flexibility with the storage reservoirs, transfers and network improvements and provides opportunities for conjunctive use with existing sources to reduce abstraction pressure. We are also committed to not increasing abstraction until sustainability assessments have been completed to avoid future WFD status deterioration.
Impact of new reservoir options on valuable habitats and species, downstream rivers and landscape connectivity	Impacts on habitats and species, connectivity and downstream rivers have been assessed within the SEA, Habitat Regulations Assessment (HRA) and WFD assessment. It is concluded that residual impacts would be minor adverse or negligible following implementation of mitigation.
Integration of natural capital in the SEA	Details of how ecosystem services have been considered and integrated within the plan development, in accordance with the water industry strategic environmental requirements (WISER) are set out in section 7.12 of the ER.
Feasibility of commitment to archaeological mitigation required	We are committed to provision of mitigation of archaeological impacts as set out in chapter 8 and scheme costs include allowances for assessment and mitigation.
Local wildlife sites should be identified by name within SEA assessments	All options will be subject to an environmental impact assessment, and local wildlife sites will be considered as part of this process. The SEA includes mitigation to avoid or reduce effects on non-statutory sites.
The dWRMP19 should be aligned with the high level Blue Print for Water outcomes	A detailed description of how our plan aligned with the Blue Print for Water outcomes is provided in Appendix H of the ER.

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