

# Statement of Response



# Statement of Response

We sought the views of our customers and stakeholders on our draft Drought Plan 2022 between June and August 2021. In this Statement of Response (SoR), we explain how we have addressed the comments and revised our Drought Plan in response to the representations received (Table 1).

We received responses from:

- Environment Agency
- Natural England
- Historic England
- Consumer Council for Water
- Wave
- Canal and River Trust

This SoR document should be read in conjunction with our revised draft Drought Plan 2022 which can be found on our [website](#).

Table 1: Statement of response, categorised by body

Body	Issue type	Area of issue	Issues and evidence	Changes required	Document reference	Anglian Water response summary
Environment Agency	<b>Recommendation 1</b> - Provide consistent information regarding bulk transfer with Cambridge Water	Issue 1.1 - Consistency between Anglian Water and Cambridge Water drought plans	The company state ‘an agreement has been made with Cambridge Water to provide a supply from the Thetford to Cambridge main, during a drought.’ The agreement is not set out consistently in the two corresponding company drought plans and there is a different understanding of how the transfer will operate during a drought.	We expect the company to ensure the following information is presented consistently with Cambridge Water: <ul style="list-style-type: none"> <li>How and when the bulk supply is triggered. How the agreement will change in a range of drought conditions.</li> <li>Confirmation that the agreement is in place for the range of droughts being assessed by the plan.</li> <li>Evidence to demonstrate the transfer is consistent with the relevant water company plans and that communications with these companies are co-ordinated during a drought event.</li> </ul>	Drought Plan Section 1.5.3 & 3.2.4	We have worked with Cambridge Water to ensure that our bulk supply import / exports are aligned within both of our Plans.  We have added in text regarding the continuous use of the Barnham Cross transfer and the drought management levels that it will be available for. A general note has also been added to make it clear that we have agreed with our neighbouring water companies that we will regularly communicate during the onset of drought and actual drought itself to minimise any impacts to our respective supply areas. The text regarding the “Thetford to Cambridge main” has been changed as it can cause confusion given the different naming terminology that both companies use for their respective supply system assets.
	<b>Improvement 1</b> - Ensure demand actions are tactical, consistent and clear	Issue 1.1 - Prescriptive and tactical demand options	Certain parts of section 3 in the main plan are not prescriptive when setting out demand actions. It is unclear which demand measures would be used in practice, why and how these would be decided.  We consider that due to the type, length of implementation and number, some of the actions set out in section 3 are not tactical. For example, compulsory metering, this action will take significant planning and logistics. We consider that this action is not be feasible as part of a tactical drought response.	We expect the company to clarify which demand actions will be part of the tactical drought response and which actions require other non-drought plan interventions to be in place.  We require the company to clearly set out which measures would be used and explain how and why these would be implemented and decided. We expect the company to consider amending the worked example (figure 3.2) to show exactly how and when demand actions would be triggered and implemented.	Drought Plan Section 3.1 and Appendix 2	We have updated Section 3 to make our demand actions text much clearer. The detailed information that we previously had in the Main Plan has now been moved to Appendix 2 to ensure the Main Plan is as tactical as possible. A table has also been added to make it clear which demand actions we would consider at which drought management level.  We have changed the language regarding metering from “compulsory” to “encourage”. We believe that both the encouragement of customers to become measured “billed” customers as well as the accelerated installation of smart meters can be tactical options as we head towards the possibility of implementing TUBs. However, we do note that the implementation timescale would be dependent upon the current progress of the two schemes within any of the affected areas.  Text has been added to support the example actions in Figure 3.2. We believe that it is not practical to try and determine exactly which demand actions will be used and exactly when they will be implemented. This is because our actions will be based on the specific conditions that an area is facing at that current time. Leakage is a good example, we would need to assess the situation at a local level in order to determine the type and scale of interventions that might be appropriate (e.g. pressure optimisation, leakage control). We will implement the demand actions that will give the greatest benefit to our customers, the environment and our water supply system.

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Environment Agency	<b>Improvement 1 -</b> Ensure demand actions are tactical, consistent and clear	Issue 1.2 - Inconsistent demand measures	Appendix 2 (demand side drought actions) does not align with section 3.1.3 of the main plan. The main plan identifies customer metering, water efficiency, pressure optimisation and advanced replacement of infrastructure as actions, in addition to communications and leakage management. These are not listed in the appendices, which appear to be the similar to the tables from previous plans.	We expect the company to update its plan to ensure consistency between Appendix 2 and section 3.1.3 in the main plan.  We require the company to clearly set out exactly which demand actions will be taken during a drought event and the order in which the actions are implemented.	Drought Plan Section 3.1 and Appendix 2	We have updated Appendix 2 to make the differences between the WRMP 2019 demand actions and the additional actions being built into the WRMP 2024 much clearer.  We have clarified that the demand saving tables in Appendix 2 Section 4 are still based upon the standard demand actions developed in WRMP 2019. Once the WRMP 2024 modelling has been completed the options, actions and potential savings will be fully realigned and updated as part of the WRMP 2024 process.
		Issue 1.3 - Spatial scale of demand actions	The geographical areas in which demand actions are implemented is unclear, due to a number of differing descriptions in the main plan. On page 75 the company states it “will implement demand management options on a local authority basis”. On page 59 the company states “drought activities... should be targeted at a sub-regional level, for example counties, districts or unitary authorities.” In regards to TUBs and NEUBs, on page 35 the company states “crossing the Level 2 curve would result in enacting TUBs and crossing the Level 3 curve would result in enacting NEUBs in the Water Resource Zone(s) affected.	We expect the company to clarify the scale at which all demand actions are implemented.  We require the company to update the relevant parts of its drought plan to ensure that the implementation of demand actions is clear and consistent throughout.  If the water company needs to make separate decisions about triggers and actions in different areas, we expect it to include a map to help customers understand and visualise how this will affect them.	Drought Plan Part 2 & Part 3	We have updated the text on the pages identified to clarify the scale at which demand actions are likely to be implemented. We will aim to target activities at a sub-regional level whilst also considering the context of the wider WRZ situation. The most important aspect being that customers will easily be able to identify the geographical area subject to restrictions.



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Environment Agency	<b>Improvement 2</b> - Clarify the operation of extreme drought management actions	Issue 2.1 - Emergency options	<p>The company has identified 2 drought actions that could be considered in a more severe drought, the Ely-Ouse to Essex Transfer Scheme (EOETS) and the Trent-Witham-Ancholme Transfer Scheme. These are described as emergency options that require changes to Environment Agency abstraction licences and therefore an application for a Drought Order.</p> <p>It is difficult to understand if these 'emergency' options are extreme drought management options and what the company considers a more severe drought. It is unclear how the options will be operated and the exact meaning of 'increasing the transfer licence'.</p> <p>There is no detail to show when the options would be triggered, applied for and how the options fit into the company drought response framework.</p> <p>It is unclear if the EOETS option has been discussed or agreed with Essex and Suffolk Water. The company has not undertaken environmental assessment for the 2 schemes and expects to clarify with the Environment Agency the requirements for environmental assessment.</p>	<p>We expect the company to clarify:</p> <ul style="list-style-type: none"> <li>• If these are classed as emergency options, or extreme drought management actions. What the company considers a more severe drought.</li> <li>• What the company considers a more severe drought.</li> <li>• The exact meaning of 'increasing the transfer licence'.</li> </ul> <p>The company should provide further detail on how the options will be operated including:</p> <ul style="list-style-type: none"> <li>• When the options would be triggered and applied for.</li> <li>• How the options fit into the company drought response framework.</li> <li>• The agreements in place for the 2 actions, for example the EOETS would need discussion and approval with the Environment Agency and Essex and Suffolk Water.</li> </ul> <p>In order to comply with relevant environmental legislation covering environmental assessments we expect the company to:</p> <ul style="list-style-type: none"> <li>• Recognise what work will be needed, in a broad sense, for each action.</li> <li>• Consider a lighter touch environmental assessment at planning stage and sets out the justification for the level of effort/resource in its environmental assessments.</li> <li>• Set out how it will discuss and clarify its environmental assessment with the Environment Agency, for example the data requirements, timing and environmental concerns.</li> </ul>	Drought Plan Section 3.3 & 3.4 and Appendix 12	<p>We have clarified that in Drought Plan Section 3.3 the EOETS and the TWAS are extreme drought management actions. This means that we would start to consider them as we head towards Level 3 and would look to apply and implement them before Level 4 (alongside the other extreme actions listed in Section 3.4).</p> <p>Section 1.6.4.1 explains our drought terminology. A severe drought refers to events with approximately a 1 in 200 year return period. An extreme drought refers to events with approximately a 1 in 500 year return period.</p> <p>The text regarding the "transfer licence" has been changed to explain specifically what the Drought Order is for e.g. temporarily increasing the licenced volume transfer.</p> <p>Text has been added to Section 3.3 to set out which parties would need to be involved in the discussion and approval of the two schemes. We recognise that the appropriate environmental assessments would have to be carried out before either of the Drought Orders are approved. We have not undertaken environmental assessments at this stage but have added text to the section to explain that we would ensure pro-active communication with the Environment Agency to determine the data requirements, implementation timing and any environmental concerns regarding the Drought Orders.</p>

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Environment Agency	<b>Improvement 2</b> - Clarify the operation of extreme drought management actions	Issue 2.2 - Tankering	<p>Section 3.4 of the draft plan and Appendix 12 identifies the use of tankering as an extreme drought management action to be implemented in all water resource zones. However, Appendix 3 identifies 3 water resource zones where tankering is presented as an option to provide a supply benefit under 1:200 drought.</p> <p>It is unclear why tankering is presented as a both an extreme drought management action (appendix 12) and a feasible, viable, low impact solution (appendix 3).</p>	<p>We expect the company to clarify that tankering is a more likely option in some water resource zones and an extreme action in others.</p> <p>We require the company to align its options between the Water Resource Management Plan 2019 and Drought Plan.</p>	Drought Plan Section 3.4 and Appendix 3 & 12	As suggested, we have added text in to Appendix 3 and 12 to clarify that tankering is more likely to be a standard action in some WRZs (Appendix 3) but then an extreme action in others (Appendix 12).
	<b>Improvement 3</b> - Consider the approach to ecological assessment	Issue 3.1 - Hydrological Assessment Matrix	<p>The company has used a hydrological screening method to assess the environmental impacts its drought permits, which is different to its previous drought plan.</p> <p>We have site specific concerns regarding the use of the hydrological matrix to determine the zone of influence and potential environmental impact.</p> <p>There are wider concerns about the criteria used for the negligible category, both its stated values and the extent to which hydrological uncertainty in its application is accounted for of hydrological screening criteria for negligible impact.</p>	<p>The approach should be considered on its merits in individual cases, do not place weight on the fact that it may have been accepted in another area or for a previous round of plans.</p> <p>The company has recognised that where there are site-specific ecological considerations that require the Zone of Influence to be revised or altered due to potential permit influence on ecology, (but where the physical environment features see limited impact) guidance will be taken from local Environment Agency area teams.</p> <p>We expect the company to continue to work with local Area teams to review and discuss the technical detail of individual drought permits. Any results from these discussions should can be included in the subsequent permit iterations.</p> <p>We also expect the company to address the separate detailed feedback from local teams on the environmental assessment of the drought plan.</p>	Drought Plan SEA, HRA and EARs	<p>We believe the new Zone of Influence method that we have adopted for the Drought Plan 2022 environmental assessments is a good step forward from what had been used in previous Plans. A clear definition of the zones allows for a more effective focussing of the scope of the study and it also provides a clear demonstration of the designated sites of interest.</p> <p>As discussed with the Environment Agency area teams we are very happy to work with them on any further site specific considerations or queries to ensure the Zone of Influence covers the appropriate features. The revised environmental documents contain a large amount of the changes already suggested but we will continue to use and share the separate feedback document with the area teams to ensure all the comments are addressed.</p> <p>When any significant changes to the permits arise we will be sure to include them in subsequent document iterations.</p>

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Natural England	Need for clarity	Monitoring and forecasting	Drought monitoring and forecasting are used to identify the timing for undertaking drought actions. However, there is no link between forecasting and monitoring and actions taken to ensure environmental sustainability.	Drought Plan Part 2	Section 2.2.2 in the Drought Plan describes how we link our monitoring and Level 1 drought management trigger to environmental droughts and the Environment Agency's area classifications. The key aim of our Level 1 actions is to help reduce demand in times of dry weather but they also provide an environmental benefit too. Our dry weather comms will also raise awareness of the environmental impact that increased water use can have. Section 2.2.2. also gives two examples of schemes that we take part in which help the environment and other key stakeholders like agriculture during times of dry weather.
	Need for clarity	Monitoring	The World Meteorological Organisation (WMO)'s user guide defines a drought event as occurring any time the SPI is continuously negative, and reaches an intensity of -1.0 or lower. The drought event ends when the SPI becomes positive. The sum of the SPI for all the months within a drought event can be termed the drought's 'magnitude'.  Considering the above, it is unclear why Table 2.7 identifies -1.5 to -1 as potential drought and actual drought only when it is lower than -1.5. this apparent discrepancy needs to be resolved or a clear rationale provided for the difference.	Drought Plan Section 2.3.1 Table 2.7	We have updated the text in the Plan to explain that Table 2.5 shows the WMO user guide for the specific rainfall scenario. Then Table 2.7 is how those rainfall scenarios relate to our sources and supply system. SPI is a meteorological metric and an impact on our supply system would come at the equivalent point to a more severe meteorological drought. Our triggers are ultimately based on key features of our supply system.
	General	River abstractions	Natural England note that river abstractions don't appear to have same level of demand management built in as for reservoirs. This is an increased environmental risk, although understand the faster variability of supply may limit the lead in times for demand management and effects to be felt the significant risk rivers face suggests a more precautionary approach should be taken.	Drought Plan Section 2.4.3	The direct intakes do not have the same level triggers which are found on the reservoirs and groundwater sources. One of the main reasons, as stated, is because the river levels have a much faster variability than our other sources so if you were to place lines on our monitoring graphs you are likely to cross them very regularly before the levels quickly rebound above them. Therefore, in the supply systems and WRZs that these direct intakes support we would use a number of different indicators alongside the river levels to assess whether demand management actions would be useful to implement. We are also in the process of producing new river models using GR6j which will provide even more information and forecasting.
	Change in language	Drought recovery triggers	"Groundwater levels are in the normal range or recharge rates are recovering" - the trigger for return to normal abstraction of groundwater recharge rates recovering implies a potential return to normal abstraction rates whilst the aquifer is still below normal, thus reducing the resilience of the aquifer and the habitats, species and sites it supports. A more resilient approach would be when levels are in the normal range AND recharge rates are recovering.  A "continued period of time" needs to be clearly defined.	Drought Plan Section 2.4.6	We have updated the text in the Plan so that it states "We determine the end of a drought to be when our water resources have returned to what would be considered 'normal' for the time of year". This replaces the "continued period of time" text. We have also changed the text from "or" to "and" as suggested.

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Natural England	Connecting people with nature - demand management	Demand management and communication	Natural England welcomes the communication pathway as an approach for changing behaviours and reducing the water demand. The overarching communication 'continuum' also provides an opportunity to inform the targeted audience how drought and excessive water use during droughts will affect both the water availability and the environment in their local area. It is currently unclear if this opportunity has been considered.	Drought Plan Section 3.1.2 & 3.1.5	Helping to protect the environment will be included within our drought communications. So as suggested we will create messaging that includes information about water availability as well as the positive environmental impact that being 'waterwise' can have.
	Need for clarity	Extreme drought actions	These extreme drought actions as listed in Table 1.2 appendix 12 could have significant environmental implications, but don't have EARs or HRAs which will be needed before implementation. The full range in Appendix 12 table 1.2 aren't in the SEA.	Drought Plan Section 3.4	We would carry out the necessary assessment before we needed to implement the actions. We have updated the SEA to include the full range of potential extreme drought management actions listed in Appendix 12.
	General	Drought Orders and extreme drought actions	Natural England would expect any drought orders and "extreme drought options" receive the necessary and appropriate level of scrutiny and consultation in accordance with all statutory requirements before they are used as they are excluded from dDP.	Drought Plan	The appropriate consultation and assessment will be carried out before any drought orders or extreme drought management actions are put in place.
	General	Environmental assessment	Natural England considers it necessary to implement precautionary measures and enhance the resilience of the protected sites before the implementation of the drought plans and permits.	Drought Plan	The drought management and drought permit triggers that we have on our sources will allow us the time to consider appropriate mitigation measures.
	General	Environmental assessment	Natural England considers that specific measures for protecting the protected sites and sensitive features shall be implemented when there is an early warning for a drought. These measures need to be specific to the protected features and relevant to the time (e.g. considering the species' different life stages or resource utilisation). Hence, Natural England advises that planning the general principles and potential measures shall be linked to the HRA and shall be completed as soon as possible to be prepared for a drought event.	Drought Plan	
	General	Zone of influence	The zone of influence of any option should be based on drawdown to account for actual effects, rather than a pre-determined area around the option. Assessment of sensitivity of features within a drawdown zone to the magnitude of drawdown is expected and not on an arbitrary level or area.	EAR	The zone of influence has been carefully defined. For example, we have undertaken detailed groundwater modelling to better understand the zone of influence for the Wellington, Wensum and Colne drought permits. The detail of the work is found in the technical groundwater reports and referenced in the appropriate Environment Assessment Report where relevant.
	General	Environmental assessment	Natural England have concerns over the use of percentage changes or other measures to determine effects without a clear rationale linked to the notified features of protected sites and evidence why the stated value has been selected for that purpose.	EAR, SEA, HRA	The Environment Assessment Report (EAR) for each drought option provides much detail on the protected sites in the catchments, the zone of influence, the assessments made and the impact pathways and effect of the operation of the drought option. This information is used to underpin the HRA and SEA reports. We have made references to the EARs to help the reader trace the evidence underpinning a comment in the HRA and SEA.



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Natural England	General	Monitoring and mitigation	To be 'application ready' the drought plan Environmental Assessment Reports (EARs) should include a clear, timetabled approach to monitoring and mitigating any protected species potentially affected by options.	SEA protected species	The EARs contains a plan for these elements, on which we invite Natural England's review and feedback.
	General	Climate change assessment	The approach taken in assessing supply side drought actions is focussed on historical condition and doesn't clearly address SEA objective 6.3 (To consider the need for adaptive measures for climate change) for the environment. A more forward looking approach considering resilience to climate change is needed. We recognise this will be most effectively delivered within WRMP24, but should be considered within this DP.	SEA Climate Change	Drought Options offer little scope to provide further adaptiveness as there is little or no construction or operational effects. The Drought Options themselves are adaptive measures to climate change and their purpose is to provide that resilience. The WRMP is the key document that assesses future flows and flow modelling. The Drought Plan is reviewed and updated every 5 years to account for the latest information provided e.g. from the WRMP.
	Need for clarity	Cumulative effects	Cumulative effects within the draft Drought Plan 2022 "The extreme supply side management actions have been excluded from the cumulative effects assessment at this stage as there are insufficient details on the location and scale of these options to enable a meaningful assessment to be made. As further information becomes available in the future these options can be assessed as part of future revisions to the Drought Plan.  Natural England considers it crucial to assess the "extreme supply-side management actions" for cumulative effects to understand the potential adverse effects and their extent on the protected sites and their qualifying features.  If sufficient data are not available, data need to be collected, and the HRA must be updated as more information on the scale and location of abstraction points becomes available.	SEA Section 6.1	The Drought Plan has been updated to reflect that if any extreme supply side management action is required, it will be subjected to environmental assessment prior to implementation. Although extreme actions have been identified, these are just possible options and their development and adoption will depend on the drought and location affected.
	Need for clarity	Cumulative effects	However, although the implementation of the Pitsford Reservoir Drought Permit would result in less water being available for abstraction at Wansford, it is not expected there would be a significant impact on the flows downstream of that intake, since increased abstraction for Pitsford would generally mean reduced abstraction for Rutland.  There remains a lot of uncertainty in this - use of "generally" leaves open situation where both are abstracted and so combined effects cannot be ruled out.	SEA Section 6.1	The word 'generally' has been removed where applicable and replaced with more targeted language.

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Natural England	Need for clarity	Cumulative effects	<p>The majority of the supply side actions assessed within the SEA are geographically distinct from each other and there are generally no overlaps between the identified zones of potential hydrological influence of each option...The only exceptions are the Pitsford Reservoir and Rutland Water options, which both abstract from the River Nene.</p> <p>Although the implementation of the Pitsford Reservoir Drought Permit would result in less water being available for abstraction at Wansford, it is not expected there would be a significant impact on the flows downstream of that intake, since increased abstraction for Pitsford would generally mean reduced abstraction for Rutland.</p> <p>Finally, the SEA states that “there are no pathways for additive effects between river flows and water quality.”</p> <p>It is unclear how the “increased abstraction for Pitsford would generally mean reduced abstraction for Rutland”. There is no reasoning behind the statement and there is no confidence that this would be the case.</p> <p>Natural England considers that there is no justification for not assessing the cumulative ecological and flow impacts of a maximum abstraction at both Pitsford and Rutland points, and it is unclear how the pathways for additive effects were ruled out as both abstractions would affect the River Nene.</p>	SEA Section 6.1	<p>We are confident that the network is sufficiently configured so there will be no in-combination effects on the River Nene.</p> <p>Increased abstraction at Pitsford would naturally cause lower flows in the Nene at Rutland which would make it more likely that the MRF at Wansford is reached and therefore abstraction restricted. Also as discussed in our meeting with Natural England the Ruthamford system (Rutland, Grafham and Pitsford) has good connectivity following the resilience work which has been completed over the last few years. So we could manage the abstraction at both reservoirs e.g. if we decide to pump more at Pitsford then we don't need to pump as much at Rutland.</p>
	Need for clarity	SSSI assessment	<p>Likely affected SSSIs have been identified in the SEA for each drought option and considered within the EARs. EARs are non-statutory at this stage so haven't had detailed scrutiny by Natural England at this stage. However initial consideration raises similar concerns to those regarding the HRA, namely it is unclear if the baseline used to determine effects of drought actions is appropriate and fully considers the sites in a drought context and the rationale and evidence for conclusions around the impacts on the sites is not always clear.</p> <p>Natural England's view therefore is that the current SSSI assessment needs to be reviewed to ensure it fully complies with the statutory requirements in terms of immediate impact and on sites' recovery from drought.</p>	SEA SSSIs	As part of the update to the SEA, all sites were reviewed. The purpose of the baseline is to contextualise the study area of the Drought Plan and the SEA is a strategic assessment. The EARs would be updated based on contemporary SSSI information when a drought permit application is required.
	Overarching issue	LSE and AAs	A HRA has been undertaken and the effects of dDP measures have been identified and taken forward to Likely Significant Effect (LSE) and Appropriate Assessments (AA). However we have significant concerns around the conclusions of No LSE or No adverse effect on integrity due to the significant nature of the identified effects on Habitats sites. Natural England therefore cannot concur with the conclusions of the HRA and recommend these are reviewed.	HRA	The conclusions of the Stage 1 Screening and Stage 2 Appropriate Assessment have been reviewed in accordance with the supplementary advice. This resulted in Breckland SAC and Rutland Water being taken through to Appropriate Assessment and conclusion of adverse effects on site integrity for the River Wensum SAC.

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Natural England	Overarching issue	Option assessment	It is unclear if options selected have been assessed to be the least damaging.	HRA	When determining the areas that would benefit from having a drought permit the locations normally have very limited options e.g. each location tends to only have one option for a permit. The appropriate assessments are then carried out in the SEA, HRA and EARs.
	Overarching issue	Mitigation	Due to the doubt over the conclusions in the HRA it is uncertain whether the proposed mitigation measures would adequately mitigate for the effects identified so these will need further consideration.	HRA	We invite further dialogue with Natural England over proposed mitigation measures in order to explore and resolve uncertainties.
	Overarching issue	Option assessment	It is not clear if or how the condition of sites in a drought situation onto which the drought options will be implemented has been considered.	HRA	The hydrology, geomorphology and water quality assessments that have been considered in the HRA, assess the impact of each drought permit using data from a previous drought or modelled baseline drought scenario.
	Overarching issue	Aquifer recovery	There appears to be a lack of actions related to facilitating aquifer recovery post drought.	HRA	Post drought we would see a natural recovery as a response to rainfall but to bolster this we would look to work with our catchment advisors who would promote recharge through engagement with farmers.
	Overarching issue	Mitigation	There is a lack of assessment of the feasibility of proposed mitigation measures for example: <ul style="list-style-type: none"> <li>• No viable location of where to move fish to if taken from an affected water body is identified (e.g. Costessey)</li> <li>• No source of water for transfers or tankering into a WRZ and its availability during a drought are given. This mitigation option would rely on other WRZs having water available which is unlikely in a drought</li> <li>• Pump lowering to compensate other abstractors will increase aquifer drawdown further, exacerbating environmental effects.</li> </ul>	HRA	We invite further dialogue with Natural England over proposed mitigation measures in order to explore and resolve uncertainties. However, for specific site-based examples we would look to confirm details that were bespoke to the event e.g. the source of water would be highly dependent on available supply.
	Overarching issue	Mitigation	Mitigation measures are insufficiently detailed and so leave lots of uncertainty around their ability to sufficiently mitigate for effects of drought options so we cannot concur with conclusions of no adverse effect on integrity on Habitats sites.	HRA	We invite further dialogue with Natural England over proposed mitigation measures in order to explore and resolve uncertainties. It is also worth noting that we would not specify mitigation for non-drought permit options due to the uncertainties regarding option implementation.

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Natural England	Need for further information	Cromwell weir	<p>The assessment of LSE highlights uncertainty relating to impacts of the permit on the river lamprey and sea lamprey SAC/Ramsar features and it is unclear from the information provided how a conclusion of no LSE can be reached where uncertainty is present. Natural England therefore does not agree that the information provided supports a conclusion of no LSE and advises that further information is required in order to rule out the likelihood of significant effects. It is also unclear whether the assessment is made only on the abstraction point and downstream effects which does not take into account the presence of Cromwell Weir as there appears to be no information on how an increased abstraction/ lower flows may affect the passability of the weir to lamprey. This is needed to inform a conclusion of LSE because if lower flows as a result of the permit have any implications for the passage of lamprey to upstream spawning grounds (or there is uncertainty relating to this) then the permit could be having an effect on these features and an appropriate assessment is required to ascertain whether this would lead to an adverse impact upon the integrity of the site. The assumption that lamprey are most likely to spawn in the middle reaches of the Trent, which will not be affected by the Drought Permit, should also be tested and the evidence presented.</p> <p>Concern is however noted in the HRA about uncertainty of passability of the weir and you the River Trent EAR recommends that a baseline study is required prior to implementation of the permit with monitoring during the operation of the permit. Natural England recommends that this baseline study is required to inform the HRA as without it or further evidence to justify your conclusions then no adverse impact upon integrity cannot be ascertained. The baseline study of lamprey weir passage would need to ascertain the conditions in which lamprey can pass the weir and whether the operation of this permit would have an impact on those conditions and whether any impacts can be mitigated.</p> <p>In summary, Natural England does not concur that the assessment has been made in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) for this permit.</p>	HRA River Trent (Hall WTW) Drought Permit	The Humber Estuary SAC SACO states that Cromwell weir 'is considered as impassable', under current conditions. Therefore, as Cromwell weir is currently acting as a barrier to upstream migration under current conditions, the operation of the drought permit will not be the cause of impassability. Based on evidence provided by the hydrological, water quality and geomorphology assessments, no impact to qualifying species of the Humber Estuary SAC/ Ramsar site are anticipated.
	Need for further information	Mitigation	<p>The mitigation measures in Appendix 8 state that drought permit abstraction will cease if a) Any impacts on fish species at Cromwell Weir are recorded; b) The flow drops below the temporarily reduced HOF, based on flow monitoring results at North Muskham, or c) Significant impacts on other receptors, such as water quality, hydrology, or ecology, are identified.</p> <p>Natural England recommends that the parameters for circumstances a) and c) are quantified as they are too generic.</p>	HRA River Trent (Hall WTW) Drought Permit	We invite further dialogue with Natural England over proposed monitoring and mitigation measures to provide the appropriate level of detail.

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Natural England	Need for further information	Rutland Water assessment	<p>'The drought plan option involves increased refilling of Rutland Water through a 50% reduction in Minimum Residual Flow (MRF). Maintaining appropriate water levels in Rutland Water is vitally important for qualifying features of the Ramsar site that rely on shallow areas to feed on macrophytes and invertebrate assemblages. During drought conditions, water quality in the River Nene maybe lower than in Rutland Water. Therefore, the reservoir could be exposed to increased nutrient concentrations (phosphate in particular). However, the supply of water from connecting tributaries as well as the second intake at Tinwell (River Welland) will aid dilution of nutrients in the River Nene, and therefore the impacts on water quality in Rutland Water are considered to be minimal.'</p> <p>View of Natural England: The assumption behind no Likely Significant Effect on Rutland Water is that the supply of water from connecting tributaries will aid dilution of nutrients in water being taken from the River Nene - to replenish the reservoir under drought conditions. The data behind this assumption have not been clearly presented. A detailed assessment of how the main reservoir and lagoons will perform under drought conditions is needed. Which connecting tributaries are considered? The River Gwash catchment for example only makes up less than 3% of the total flow into Rutland Water. Source apportionment for phosphorus at Rutland Water shows a wide range of sources, dominated by WwTW effluent. Nitrate loads should also be considered due to the prominence of arable cultivation in the Gwash and surrounding catchments.</p> <p>The Rutland Water refill schemes are also mentioned, in the otherwise useful Appendix 13 'Lessons Learnt' document, however these are not detailed. This is critical because as in previous droughts, refilling inflows are likely to be impeded by low river flows.</p> <p>Similarly, there is an over-reliance on the assumption that high rainfall associated with autumn and winter will lead to no LSE on water levels. Previous droughts in 1976, 1992 and 2012 were also followed fortunately by periods of above average rainfall, however this cannot be relied upon. Autumn and winter filling is particularly important as the habitat regularly supports a significant percentage of the wintering north-western European populations of certain species. Currently we believe the environmental conditions at Rutland Water remain favourable for Mallard, Pochard and Goosander, but due to fewer birds over-wintering in England and the availability of suitable, alternative sites, it is evident that Rutland Water is currently under-capacity for these species (Natural England Rutland Water SSSI Condition Assessment 2021).</p> <p>Due to the points above we also disagree with the SEA summary that there will be a slightly positive effect on water quality in Rutland Water (page 73).</p>	HRA Rutland Water Drought Permit	Rutland Water SSSI (units 029, 030, 031) is currently in favourable condition (Natural England Records Management system not publicly available for more detail). In supplementary advice for Rutland Water SPA, it suggests that meeting the surface water environmental standards set out by the WFD will be sufficient to support the SPA Conservation Objectives. In 2019, phosphate concentrations in the River Nene at Islip to Tidal were considered poor. Based on water quality data collected at Hambleton South Shore, Rutland Water in 2019 - 2020 also had total phosphorus concentrations above the WFD EQS threshold for moderate alkalinity, deep waterbodies (annual mean phosphorus of 0.082 mg/l, annual mean threshold is 0.012 mg/l). Therefore, due to potential water quality deterioration in Rutland Water SPA and Ramsar site, River Nene (Wansford Intake/ Rutland Water) was taken through to Appropriate Assessment. In order to mitigate for adverse effects on site integrity, pre-treatment (phosphate stripping) at Water Recycling Centres and the River Nene intake have been added as potential mitigation measures.



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Natural England	Need for further information	Rutland Water assessment	<p>‘Although no water quality impacts were found following the application of the winter drought permit in 2011/2012, there is a potential that a more severe drought may lead to water quality impacts, particularly in orthophosphate concentrations. These impacts combined with potential algal blooms may negatively impact upon navigation and ecology, although these impacts can be reduced due to sporadic high flows and temporary phosphate stripping at Water Recycling Centres’.</p> <p>View of Natural England: Further detail is required of how temporary phosphate stripping would be implemented. Oakham STW has previously been identified for phosphorus removal and Rutland Water is known to suffer from significant blue-green algal blooms, especially in lagoons 2 &amp; 3 which receive treated water from Oakham STW. The Leicestershire and Rutland Wildlife Trust is commencing a monitoring programme to assess whether and how the blooms are impacting on wetland bird assemblages. The environmental trigger levels for algal blooms need to be better understood under drought conditions, in order to understand the significance of refilling inflows from the Nene.</p>	HRA Rutland Water Drought Permit	Anglian Water will review the monitoring and mitigation requirements in more detail. Previous modelling work and experience from the 2011-2012 drought have shown that positive results can be achieved using phosphate stripping. We would be keen to learn the results from the Wildlife Trust’s monitoring project to better understand how the flows into Rutland can affect the lagoons.
	General	Upper Nene assessment	Upper Nene Gravel Pits SPA is designated for water dependent internationally important bird populations. The last SSSI assessment (2020) concludes that the condition of protected feature Pluvialis apricaria is unfavourable no change in half of the SSSI units and unfavourable recovering in the rest. While water quality is not the reason for the unfavourable condition (public access and disturbance) it is important for the HRA to consider synergistic effects.	HRA Upper Nene Gravel Pits SPA	Consideration has been added to the assessment. However, as the impact pathway causing potential declines in golden plover populations does not relate to water quality (public access and disturbance), the assessment of no LSE will remain the same.
	Need for clarity	Upper Nene assessment	<p>In addition, the statement “one (site) is not thought to be significantly important to the key species” does not convey any confidence for concluding a no LSE.</p> <p>Also, as in “periods of low flow, the prevailing flow direction is from the Upper Nene Gravel Pits to the main river” there is a risk that abstraction from the river in combination with a potentially lower water flow due to the drought, would result in enhanced flow from the gravel pits to the river. It remains unclear if the HRA has considered the impacts of lower water levels in the gravel pits.</p> <p>It is unclear from the information provided how a conclusion of no LSE can be reached where uncertainty is present and Natural England does not concur that the assessment has been made in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) for this permit.</p>	HRA Upper Nene Gravel Pits SPA	<p>Further assessment and justification has been added to the Screening Assessment that sets out the thinking behind the conclusion.</p> <p>The additional text sets out what has been considered, including the examination of hydrological connections, and direct and indirect impact pathways using information on physical characteristics of the area, and the requirements of the notified species.</p>

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Natural England	Need for further information	Upper Nene assessment	While the HRA acknowledges the impacts of flow reduction and potential impacts of reduced dilution downstream of the abstraction, it concludes no LSE based on the distance between the abstraction point and the Ramsar Site. This approach does not consider any effects due to functionally linked habitats. In addition, Nene washes Ramsar has protected rare invertebrate populations. It is unclear if the HRA has considered any dispersal, migration, or requirement of the protected species and concerning their different life stages, and any potential interruptions due to water quality issues.	HRA Upper Nene Gravel Pits SPA	Reference to potentially functionally linked habitat has been added. The site boundaries of Barnes Meadows Local Nature Reserve overlaps with the River Nene and old course of the River Nene, and consists of lowland fen priority habitat. The site description does not include qualifying species of the SPA and no WeBS counts have been conducted at the site. As no changes are expected to baseline groundwater and impacts of reduced flow will be limited to vegetation along the immediate periphery of the River Nene (lowland fen priority habitat is ~ 40m away from the main channel), no LSE are anticipated on functionally linked habitat.
	Need for clarity	Upper Nene assessment	It is unclear from the information provided how a conclusion of no LSE can be reached where uncertainty is present, and Natural England does not concur that the assessment has been made in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) for this permit.	HRA Upper Nene Gravel Pits SPA	Further assessment and justification has been added to the Screening Assessment that sets out the thinking behind the conclusion.  The additional text sets out what has been considered, including the examination of hydrological connections, and direct and indirect impact pathways using information on physical characteristics of the area, and the requirements of the notified species.
	Need for further information	River Wensum assessment	4.10.1 It is the watercourse as a whole that is the notified feature, which is typified by the presence of Ranunculus, not just Ranunculus. So the effects on the watercourse need to be assessed in line with Conservation Objectives and associated Supplementary Advice for the whole river feature.	HRA River Wensum Drought Permit	Text has been amended to reflect that the Appropriate Assessment is focusing on the watercourse as a whole.
	Need for clarity	River Wensum assessment	It is not clear whether Costessey has been assessed as the least damaging option. Costessey was removed as a supply option and replaced by the Heigham abstraction due to its impact on the Wensum SAC so it is unclear how re-instating it during a drought is the least damaging option available.	HRA River Wensum Drought Permit	The main reason for "removing" Costessey and replacing with Heigham is because we need to use that supply option on a day-to-day basis. Understandably we wanted to implement and use a daily supply option that would be the least damaging to the environment. However, it is misleading to say that we "removed" Costessey because we just "moved" the option across to being a drought permit. Being a drought permit means that it is very unlikely to be needed (1 in 200 year event etc.) so the impact has "greatly reduced" from when it was a normal supply option. It is also important to note that there is a distinct lack of available alternatives outside of the SAC.

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Natural England	Need for further information	River Wensum assessment	Table 5.8 The Wensum SAC P target of 0.03 (interim 0.05) should be used. Refer to Supplementary Advice for the Conservation Objectives (SACO) for more information.	HRA River Wensum SAC	References to attribute targets in the supplementary advice have been added throughout the HRA.
	Need for further information	River Wensum assessment	<p>5.3.1 Table 5.7 There is no explanation of how the conclusions reached on the flow reduction percentages have been reached and it is not clear if the state of the river during a drought has been fully taken into account when applying these reductions.</p> <p>Reaches 2 and 3 are shown to have deviations from naturalised targets alone significantly in excess of maximum flow deviations so cannot be considered minor.</p> <p>It is unclear what baseline flows are being used to calculate these deviations - naturalised or some reference flow condition (as appears to have been used for the Wellington drought option). If the latter site will already be impacted and close to maximum flow reductions as detailed in the SACO, then further reductions will be even more significant.</p> <p>Splitting year into 2 halves to assess flow effects effectively lowers the flow levels for a given Q value so effects are more significant and impact is further below the actual Conservation Objectives, which are based on annual Q values, than the percentage reduction given. This is a misrepresentation of the standardised measure used across all protected rivers nationally so inappropriate and should not be used.</p> <p>Natural England therefore do not concur with the assessment of effects of this drought option on the River Wensum SAC and suggest it needs further consideration and mitigation if required.</p>	HRA River Wensum SAC	Hydrological assessments have been conducted using 'naturalised' flow data and annual Q99 values to reflect estimated reductions in flow during the drought permit and to align with flow regime attribute targets as per the supplementary advice. Considering reductions in the flow regime, groundwater drawdown extent and the potential deterioration of suitable wetted habitat for Desmoulin's whorl snail, plus water quality deterioration, there is potential for adverse effects on site integrity as a result of the Costessey Boreholes drought permit.
	General	River Wensum assessment	Table 5.8 The phosphate EQS of 0.7 exceeds SAC standards by 40% so should not be used within final determination of effects where the most stringent target applies.	HRA River Wensum SAC	The assessment has been amended to reflect consideration of attribute targets for soluble reactive phosphorus (orthophosphate) within the supplementary advice.
	Need for clarity	River Wensum assessment	5.3.2.1 "Phosphate contaminants from sewage treatment works are therefore, not anticipated to increase significantly" this statement appears to rely on the incorrect assessment of flow reductions so the effects of increased P concentrations cannot be dismissed without a clear rationale and numerical evidence.	HRA River Wensum SAC	Text has been removed.
	General	River Wensum assessment	Page 83 "This further suggests that this site is no longer viable for the snail" - current unfavourability for a feature is not sufficient grounds for no further consideration and action if required. Drought options should prevent further deterioration and not prevent or inhibit restoration.	HRA River Wensum SAC	The assessment of the River Wensum SAC has been amended, concluding adverse effects on site integrity based on groundwater drawdown and potential deterioration in suitable wetted habitat for Desmoulin's whorl snail, plus reductions in flow and increased phosphorus concentrations.

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Natural England	Need for further information	Wellington Wellfield assessment	The use of fully licenced as baseline from which to determine environmental effect of drought option is not appropriate as fully licenced may already result in site being under hydrological stress. Effects should be assessed on basis of the actual environmental stress the site will be under at the time of drought. Naturalised should be the baseline from which all abstractions are assessed.	HRA Norfolk Valley Fens SAC and Breckland SAC (Wellington Wellfield)	Previous studies involved groundwater modelling. These included scenarios examining the fully licensed situation. Our assessment has used this information and other sources, but has concluded no LSE for Norfolk Valley Fens SAC (based on negligible impacts during the summer and minor during the winter) and potential LSE for Breckland SAC (based on moderate impacts during the winter). We note Natural England's comment regarding the naturalised scenario and it will be considered for future assessments but it is important to note that naturalised flows do not fully represent a drought scenario either as there will continue to be discharges and some abstractions depending on the drought severity.
	Need for further information	Wellington Wellfield assessment	<p>Table 3.1 Additional drawdown of 1m within a 3.5km radius of Wellington Wellfield and Denton Lodge boreholes may impact on water levels in local rivers (Little Ouse River and River Wissey) and associated ponds within the SAC. However, an increase of 10ML/d is considered a minor change that is unlikely to have a significant effect on water levels in localised waterbodies. Therefore, no LSEs are anticipated.</p> <p>The level of drawdown used to inform the LSE screening is not that experienced at the sites potentially affected and the quoted drawdown of 1m would be highly significant for the groundwater dependent features of both Norfolk Valley Fens and Breckland SACs. It doesn't appear to have been taken into consideration that the sites will already be in a drought stressed condition hence the cumulative effects of the drought and drought options have not been assessed.</p> <p>The additional modelled data and commentary in the EAR suggests there is no immediate effect on GWDTEs from this option as the site will already be drought stressed. There is insufficient consideration shown of the features to have confidence in the impact assessments.</p> <p>The EAR does recognise there is uncertainty around the implications for site recovery and recommends further monitoring which is welcome. However without further action to facilitate site recovery from the additional drawdown caused by the option the monitoring alone does not constitute appropriate mitigation.</p> <p>As a result Natural England cannot concur with the conclusion of No LSE at this stage and suggest further more detailed assessment and identification of mitigation actions is required for all the wetland habitats potentially affected.</p>	HRA Norfolk Valley Fens SAC and Breckland SAC (Wellington Wellfield)	Upon review of the Stage 1 Screening Assessment for Breckland SAC, Wellington Wellfield drought permit was taken through to Appropriate Assessment due to moderate impacts to groundwater sources during the winter (potential drawdown of 0.22m) and potential adverse effects on the following groundwater dependent features: natural eutrophic lakes, alluvial forests and great crested newt. For Norfolk Valley Fens SAC, the site is located approximately 6.5km from the boreholes. Groundwater assessments anticipate a negligible impact during the summer and minor impact during the winter (reduction of 0.04m). Further justification for no LSE has been added to the Stage 1 Screening assessment for Norfolk Valley Fens SAC.

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Natural England	General	Ouse assessment	5.1.3.1/2 Dilution will come from further discharges (and their catchment) into system between intake and Ouse Washes, and not as a direct function of distance so this needs to be taken into account before reaching a conclusion.	HRA Ouse Washes SAC, SPA, Ramsar	This has been considered in the assessment as recommended. The updated assessment still arrived at the same conclusion.
	Need for clarity	Ouse assessment	On the basis that the drought permit will be applied only in a severe drought and therefore, the frequency of increased abstraction will be low and temporary, no adverse effects on the qualifying feature are anticipated relating to reduced flows, deterioration in water quality (particularly orthophosphate) or increased siltation within the Ouse Washes Ramsar site. However, further monitoring and mitigation is required to conclude with certainty that there will be no adverse effects on submerged and marginal vegetation, particularly during the operation of the Stage 2 permit during the summer months.  It is not appropriate to conclude No LSE simply on basis of low frequency or short term nature of the drought action. The actual impacts and the duration of any effects need to be considered.  Further, the quote above, applied to all Ouse Washes features, is contradictory. The first statement cannot be true whilst the doubt provided by the second remains. We support the second statement so the No LSE conclusion needs rectifying to reflect this.	HRA Ouse Washes SAC, SPA, Ramsar	The assessment has been reviewed considering attribute targets within the supplementary advice and appropriate mitigation measures have been added to prevent adverse effects.
	Need for clarity	Mitigation	“Potential modification of flood defence activities that are routine in summer and may cause sedimentation and phosphate mobilisation.” And “Dredging or weed clearance” are potentially contradictory so need more careful consideration and articulation of the full implications of these mitigation measures would take.	HRA Ouse Washes SAC, SPA, Ramsar	Text has been added to the EAR for the Ouse to reflect that these measures are potentially contradictory in outcome and would need careful consideration of the direct and indirect effects arising from their use before implementation.
	Need for further information	Mitigation	Table 5.3 Mitigation actions are not well defined and so their ability to address nutrient enrichment remains uncertain for example “review of current site management and potential sediment monitoring methods before, during and after the operation of this drought option is recommended to prevent adverse effects on site integrity”.	HRA Ouse Washes SAC, SPA, Ramsar	We invite further dialogue with Natural England over proposed mitigation measures in order to explore and resolve uncertainties.
	Need for further information	Mitigation	It is unclear how a review of site management will address offsite issues caused by drought actions. Natural England therefore consider there to be too much uncertainty within the proposed mitigation measures as to their effectiveness at addressing the effects identified so we cannot concur with the conclusion of no adverse effect on integrity.	HRA Ouse Washes SAC, SPA, Ramsar	Mitigation measures have been proposed in order to mitigate for adverse effect on site integrity in relation to potential water quality deterioration.



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Historic England	Request for further detail / information in the Plan	Planned growth in the region	Parts of the region are experiencing a period of major expansion, with urban extensions and new settlements under-construction or planned.	In the course of your operations, we trust that you will consult the historic environment records held at each County Council and seek the necessary advice from the relevant local authority conservation officers to ensure that impacts on heritage assets are avoided or, where this is not possible, mitigated. Harm cannot always be mitigated and as such works may not be acceptable.	N/A	Growth within our region is addressed with actions in our WRMP rather than the Drought Plan.  The Drought Plan includes very few options that would require any sort of construction and/or building as the majority of options are meant to be temporary increases in abstraction. There are a couple of 'extreme actions' that might require further work such as deepening boreholes but as suggested in the SEA, a more detailed assessment would be need to be carried out if Anglian Water ever needed to implement an 'extreme action' in the case of an extreme drought (greater than 1 in 200-year event).
	Request for further detail / information in the Plan	Environmental consultation	We note the intention to consult the Environment Agency and Natural England in relation to potential environment impacts.	We suggest that it would also be appropriate to consult with Historic England as a statutory consultee on such occasions.	Drought Plan Section 1.4.1, 3.3, 3.5.3, 3.6.5	We will amend the Drought Plan so that it states that Historic England (along with the Environment Agency and Natural England) are consulted in the event of a drought permit application. This will ensure adequate mitigation is in place to manage environmental risk and could include consulting on techniques such as deposit modelling.
	Request for further detail / information in the Plan	Heritage assets and historic environment	There is no mention of heritage assets and their settings or the historic environment throughout the Plan which is disappointing.	Reference should be made to the issues outlined as part of our overall response.	Drought Plan Section 3.3 & 3.6	Whilst this has been assessed and explained within the SEA report, we will amend the main Drought Plan to highlight that the historic environment has been considered alongside the environmental impacts.
	Request for further detail / information in the Plan	SEA sensitivity	Several heritage asset types are identified within these categories. However, there is no mention of Grade II* listed buildings. Secondly, we suggest that it is not appropriate to group all historic parks and gardens together and only accord local significance. Registered Parks and Gardens have different levels of listing (Grade I, II* and II).	Reflect the different heritage asset types and levels within the report.	SEA	We have split out the listed buildings to include Grade II* as well as splitting out the registered parks and gardens.

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Historic England	Request for further detail / information in the Plan	SEA sensitivity	Non-designated heritage should also be considered (it is currently not listed in the list of heritage types in Table 3.1 for example). It is worth noting that non-designated heritage assets of archaeological interest can be of equivalent significance to designated heritage. In addition, non-designated heritage of local significance is often very important to local people and contributes to a local sense of place.	Reflect the different heritage asset types and levels within the report.	SEA	This has not been assessed as a result of insufficient data sets to inform a baseline on this. We welcome further discussion on the feasibility - and proportionality - of gathering accurate data to enable non-designated heritage sites to be assessed.
	Request for further detail / information in the Plan	SEA negligible impact assessment	We note that the assessment identifies negligible effects on the historic environment throughout. This seems to be an over simplistic, and generic assessment, lacking detail.	We suggest it would be helpful to give further consideration to potential impacts, as outlined in our overall response.	SEA	Our SEA objective - 7.1 'To protect and where feasible enhance sites and features of archaeological, historic, and architectural interest (such as heritage assets), and their settings' - ensures heritage assets are screened as a part of key baseline data sets to determine any likely significant impacts on the hydrological 'Zone of Influence' (Zol) of sites where we would implement a drought permit. For any assets that remain after the screening process detailed above, the conclusion of 'negligible' is determined on the basis that the drawdown due to the drought option would not be significantly additional to the low water levels / tables experienced naturally due to prolonged low rainfall.  That being said, we note that assets such as archaeological features dependent on anoxic, waterlogged conditions for preservation (wetlands) might still be vulnerable. However, we are not sighted on any buried archaeology assets in wetland environments in the study area. If there is information that Historic England can provide, then we can look to see where the buried assets are located and review the assessment.
	Request for further detail / information in the Plan	SEA mitigation measures	We welcome the reference to Historic England's Preserving Archaeological Remains Guidance in regards to mitigation. However, this should also be referenced in the Drought Plan itself and followed in the event of a drought scenario.	Reference should be made to the Preserving Archaeological Remains Guidance mitigation in the Drought Plan.	SEA	Due to the assessment resulting in negligible effects in the Zol as a result of Anglian Water's drought permits, no proactive mitigation has currently been detailed in the monitoring and mitigation plans for each drought permit. Nevertheless, we welcome further discussion on Historic England's 'Preserving Archaeological Remains' to explore what you would consider to be an appropriate set of mitigation measures.

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CCW	Request for clarity	Communications Plan clarity - customer restrictions	The document could be clearer about how Anglian Water would communicate what restrictions would be placed on customers at different levels of drought (i.e. what they can and can't do).	Clarify how Anglian Water would communicate what restrictions would be placed on customers at different levels of drought (i.e. what they can and can't do).	Drought Plan Section 3.5.4 and Appendix 10	We have added text to the Communications section in the Main Plan and Appendix 10 that refers to Appendix 11 which is where we set out how restrictions such as TUBs and NEUBs will be phased in, what would be included in the restrictions, what the exemptions to those restrictions would be, how representation can be made and then how we would consider any representation.
		Communications Plan clarity - NHH, retailers & NAVs restrictions and communications	The Drought Plan could be clearer about how restrictions would be phased in for non-household customers and customers of NAVs.	Clarify how restrictions would be phased in for non-household customers and customers of New Appointments and Variations (NAVs).	Drought Plan Section 3.5.4 and Appendix 10	<p>Details of the TUB and NEUB restrictions can be found in Appendix 11 but we are also working with retailers and NAVs on improving how these restrictions would be communicated to their customers as part of WRMP 2024. This work will allow the current water resources situation and the relevant messages to be proactively shared with the retailers and NAVs that we work with, ensuring that we can produce aligned comms and determine the most appropriate demand actions. As this work develops we will update the Drought Plan.</p> <p>We are currently trialling a retailer drought map which shows a “live” representation of the water resources situation in our region. This will allow us to warn retailers of impending dry or drought conditions and what demand restrictions we might need to implement so that we can work together to ensure consistent messaging in the affected areas.</p>
			The plan could also be strengthened if it considered how Anglian Water will ensure that relevant messages are effectively cascaded to customers from retailers and New Appointments and Variations (NAVs).	Add detail covering how Anglian Water will ensure that relevant messages are effectively cascaded to customers from retailers and New Appointments and Variations (NAVs).		
Wave	Request for cooperation with retailers to ensure pro-active communication	Wave would like to encourage a proactive, targeted approach that will ensure maximum non-essential demand reduction when required	Wave now holds the direct relationship with the non-household customer base and believes Retailers can play a key part in the promotion of voluntary restraint during a drought event. They suggest that early preparation and advance communication would facilitate this.	Wholesalers should identify the customers or supply areas that may need this intervention during non-drought times to allow Retailers to draw up plans with these customers in a less reactive manner. These plans could be captured in Site Specific Arrangements that are again supported by the market codes and could set out steps that could be taken should a drought occur. AWS's existing Water Situation Report is helpful in this regard.	Drought Plan Section 3.1 & 3.5.4 and Appendix 2 & 10	<p>Comments acknowledged. We state in the Plan that “as part of our WRMP 2024 demand management strategy, we are currently working on the next iteration of our engagement with retailers on demand management. This will include a dedicated section on our wholesale website providing targeted information for retailers and, also, content which can be directed towards end user non-household customers. In recognising that the retailer owns the relationship with the end-user non-household customer and that they will, in most cases, have a greater understanding of water consumption for their customers, we have a scheme which seeks to work with retailers in helping us manage demand and optimise our network. This is advertised on our wholesale website.” and “We will work together with retailers and NAVs on communications that will support them in educating their customers on what can be done to support our wider water efficiency requirements”.</p> <p>However, we appreciate Wave's support and suggestions to keep improving this approach as well as working on trials like the Retailer Drought Map mentioned in the CCW response. As our new WRMP 2024 strategies develop we will be sure to include them within the Drought Plan.</p>

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Canal and River Trust	Acknowledgment	N/A	Canal and River Trust welcome the opportunity to work closely with Anglian Water to support the Drought Plan implementation when it occurs.	N/A	N/A	Comments acknowledged. Anglian Water is committed to working with bodies such as the Canal and River Trust.



**Cover photo** - Anglian Water's Rutland Water reservoir, a 1,555-hectare biological Site of Special Scientific Interest (SSSI), east of Oakham in Rutland. It was designated a SSSI in 1984.