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# **Anglian Water WRMP24 Environmental Report**

Appendix B: Scoping Report Consultation Log

August 2024

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# Anglian Water WRMP24 Environmental Report

Appendix B: Scoping Report Consultation Log

August 2024

# Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
A	29/08/23	Various	Checked	Approved	Appendix for revised draft WRMP24
B	02/08/24	Various	Checked	Approved	Appendix for WRMP24

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# 1 Scoping Report Consultation Log

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
<b>Natural England WRMP24 SEA Consultation Response received 26 April 2021</b>						
1	26/04/2021	Natural England (NE)	-	Combination of Anglian Water WRMP options may lead to significant synergistic impacts and deviation from WRE conclusions, so care is needed to check any WRE conclusions remain valid; for example, potential synergistic adverse effects of multiple points of <10MI/d need to be addressed collectively.	Agreed and this is already being undertaken.	A plan as a whole assessment and cumulative assessment has been undertaken for the WRMP24 plan and is outlined in Section 6 and Section 8 of the Environmental Report.
2	26/04/2021	NE	-	The WRE IEA analysis may be conducted at a lower spatial resolution; the resolution is crucial for resource availability and allocation, and appropriate resolution is imperative for hydrological models. There is a risk in obtaining the WRE models and a higher resolution analysis may be necessary for the Anglian Water SEA compared to the WRE IEA.	The WRMP24 methodology will feed off the same information as used in the WRE IEA. However, given the smaller scale/size of WRMP24 options, the assessments will be undertaken at an appropriate resolution.	Please see Section 2 of the Environmental Report which outlines the regional planning context, and how this is considered in the assessment.
3	26/04/2021	NE	-	We are not clear of exactly how WRE modelling treats Protected Sites requirements. If this is partial or incomplete further modelling will be needed to address these	The WRE IEA undertakes a HRA ToLS on designated sites and their qualifying features. At this stage this is considered sufficient to inform option selection. Once selected a HRA Appropriate Assessment will be conducted for those options where it is deemed necessary.	Habitats regulations assessment outlines methodology in Section 2 for both ToLS and AA.
4	26/04/2021	NE	-	Similarly, the resolution issue apply to the analysis of Invasive Non-Native Species and disease transmission is particularly dependant on spatial resolution	The strategic plan is centred around a risk assessment, this is based around the type of option it is (i.e. water transfer), the location (i.e. there are maps around where certain INNS are) and local issues.	INNS Risk Assessment methodology is provided within the Anglian Water WRMP24 sub-report D – <i>Invasive Non-Native Species Risk Assessment</i> , Section 2.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
5	26/04/2021	NE	-	When assessing potential impacts, further to distance buffers, pathways of connectivity should be considered	The HRA ToLS uses the distance buffers to inform the identification of potential impacts. However, the assessors also assess sites where pathways of connectivity (e.g. hydrological) are identified, even if outside of the zone of influence.	Habitats regulations assessment confirms in Section 2.2 that pathways of connectivity have been considered.
6	26/04/2021	NE	-	Include consideration of functionally linked land as well as land within Protected Site boundaries	This is already being undertaken as part of the Natural Capital assessment and HRA.	Habitats regulations assessment confirms in Section 2.3 that functionally linked land has been considered.
7	26/04/2021	NE	-	Interactions between multiple stressors on environmental donors and receptors should be considered	Noted, this is already done as part of the environmental flow assessments - outside of the environmental assessment workstream's scope	This is contained within the Environmental Flow Assessments (not part of this commission). Nevertheless, the Plan-wide assessments (Section 6 and Section 7) have identified combined effects on receptors from options within the Plan. Section 8 also looks at cumulative effects from the Plan and other Plans, Programmes and Strategic Projects.
8	26/04/2021	NE	-	For any options that involve transfers to or from regions outside the scope of this plan we'd expect to see a clear explanation of how Habitats Regulations assessment is met and consistent for both the donor and recipient regions	As outlined in the WRE IEA Methodology, the HRA ToLS (and HRA AA if needed) are conducted for the entire route, even if this sits outside of the Anglian/WRE zone.	Habitats regulations assessment outlines methodology in Section 2 for both ToLS and AA.
9	26/04/2021	NE	-	Supporting Lawton recommendation for planning and management of water resources, the 25-year environment plan and creating green infrastructure are objectives in the Consultation Table 1 but not in Consultation Table 2, where they are included as criteria.	This is correct, Consultation Table 1 aligned to the SEA Regulatory requirement to identify environmental protection objectives that form the context which Anglian Water's WRMP plan-making process sits within. Consultation Table 2 defined the assessment framework for the SEA that will be used to undertake the assessment of the WRMP. As such, the development of Lawton, etc from external environmental protection objectives to criteria that	Please see Section 3.3 and Table 3.2 in the Environmental Report, which highlight how Lawton has been considered. Primarily with the environmental protection objectives, factored into the WRMP24.

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					make up part of the SEA framework ensures these issues are being considered as part of our SEA process.	
10	26/04/2021	NE	-	It is also not clear what "sub-regional" refers to in Box 4 p. 23	Sub-regional means an option that is only considered within the WRMP24 process as it does not meet the threshold to be a WRE regional option.	N/A
11	26/04/2021	NE	-	3.3 Box 4: Note BNG is likely to be mandatory by the time assets identified in the WRMP are designed and built	Noted.	The forthcoming requirement for mandatory 10% BNG is referenced throughout the Biodiversity net gain and natural capital assessment
12	26/04/2021	NE	Conserve and restore or recover flora, fauna....	We are open to consideration of BNG off site where the same investment could deliver more and more in line with Lawton/NRN off site	Agree. This may be needed for certain option types.	Plan B Roadmap to achieve BNG outlined within the Biodiversity net gain and natural capital assessment
13	26/04/2021	NE	Conserve and restore or recover wetlands and their resources	SCP (Systematic Conservation Planning) can help identify opportunities outside statutorily protected sites which still must be protected in line with duties	Noted.	Plan B Roadmap to achieve BNG outlined within the Biodiversity net gain and natural capital assessment
14	26/04/2021	NE	Note meeting WFD GES objectives won't in most cases achieve criteria for protected sites. WFD HES is a closer match to any site-specific targets which should be met	Sole focus on WFD targets is not sufficient as meeting WFD GES will not meet statutory requirements for Protected Sites	The HRA and WFD assessments are completed in tandem and the results from both assessments are fed into the wider SEA environmental assessment report. Therefore, the WFD targets will not be the only ones used when considering protected sites.	HRA and WFD results reported in the plan context within Sections 6, 7 and 8 of the Environmental Report.
15	26/04/2021	NE	Peat soils are agriculturally valuable, but ultimately unsustainable and a major carbon source	Opportunities are not limited to ELM or related schemes; developer contributions, NSWP etc	At the WRMP level opportunities will be considered.	Carbon sequestration considered as part of the Biodiversity net gain and natural capital assessment. Peatland restoration has been identified as an enhancement opportunity, which will be



No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			which needs to be recognised			considered at the project-level and supported by soil sampling and survey data. Proposals to restore peat will be coordinated across the natural capital proposals to deliver environmental benefits and the habitat restoration and enhancement proposals to deliver BNG.
16	26/04/2021	NE		Need to ensure WRMP doesn't contribute to poor, or reductions in, air quality in operation or construction	Noted.	Objective 15 in the Environmental Report is: "To reduce and minimise air emissions during construction and operation" and this is outlined within Section 4.
17	26/04/2021	NE	Suggested New Objective: Promote behaviour change to reduce unnecessary consumption and waste	Responsible recreation and access to natural environment	Noted.	Full list of SEA Objectives and Assessment Questions/ Sub-Themes is outlined within Section 4 of the Environment Report.
18	26/04/2021	NE	3.3 Consultation table 2 Biodiversity flora and fauna Assessment criteria	Regarding "Will the option protect and enhance aquatic habitats and species, including freshwater fisheries and chalk rivers?" - Will the option result in nutrient loading which may adversely affect the habitats or species?	This will be considered as part of the assessment criteria.	"Will the option protect and enhance aquatic habitats and species, including freshwater fisheries and chalk rivers?" is included as a sub-theme of the biodiversity related objectives. This is outlined within Section 4 in the Environmental Report.
19	26/04/2021	NE	3.3 Consultation table 2 Biodiversity flora and fauna	No direct reference to bird populations	Specific species will be looked at a later stage of the project.	"Will the option affect any habitats that support legally protected species or species of conservation concern?" Is included as a sub-theme of the biodiversity related objectives. This covers birds and other protected species. This is

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20	26/04/2021	NE	3.3 Consultation table 2 Biodiversity flora and fauna Proposed objectives	INNS risk assessment findings from a wider assessment may pose an increased risk on the spread of invasive species if the resolution used for the "wider assessment" is lower. Advice to check the resolution and consider population specific biosecurity aspects (e.g. disease vectors that can potentially affect more prominently "naïve" populations not exposed to the parasite)	The strategic plan is centred around a risk assessment, this is based around the type of option it is i.e. water transfer and the location i.e. there are maps around where certain INNS are and local issues.	outlined within Section 4 in the Environmental Report.  INNS Risk Assessment methodology is provided within the Anglian Water WRMP24 sub-report D – <i>Invasive Non-Native Species Risk Assessment</i> , Section 2.
21	26/04/2021	NE	3.3 Consultation table 2 Biodiversity flora and fauna Proposed objectives	Include fish passage and specific consideration of eels needed	Fish and eels are considered as part of the assessment.	"Will the option protect and enhance aquatic habitats and species, including freshwater fisheries and chalk rivers?" is included as a sub-theme of the biodiversity related objectives. This is outlined within Section 4 in the Environmental Report.
22	26/04/2021	NE	3.3 Consultation table 2 Biodiversity flora and fauna Proposed objectives	Will the option affect the marine and transitional environment	Terrestrial marine and transitional environments are considered across the environmental assessments.	"Will the option affect the marine environment, habitats and species (including MCZs and MPAs)?" Is included as a sub-theme of the biodiversity related objectives. This is outlined within Section 4 in the Environmental Report.
23	26/04/2021	NE	3.3 Consultation table 2 Biodiversity flora and fauna Proposed objectives	"Will the option provide opportunities to enhance and provide climate change resilience to water dependent Natura 2000 sites/features?" Although likely to most affect water dependent features opportunities shouldn't be restricted to this, but all sites and features. Don't restrict to just European Sites	The current Biodiversity objectives consider both positive (opportunities) and negative effects to designated sites and undesignated biodiversity sites are considered as part of the SEA.	"Will the option provide opportunities to enhance and provide climate resilience to water dependent NSN sites/ features?" is included as a sub-theme of the biodiversity related objectives. This is outlined within Section 4 in the Environmental Report.

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24	26/04/2021	NE	3.3 Consultation table 2 Water	Be clear all items consider both during any construction as well as operation	Noted.	Outlined within each of the SEA matrices and split out within the Environmental Report within Section 6 and 7.
25	26/04/2021	NE	3.3 Consultation table 2 Water	"Will the option affect carbon sequestration, including impacts on wetting / drying, restoration or formation of peat?"	Peatland will be considered in assessment	Carbon sequestration considered as part of the Biodiversity net gain and natural capital assessment. Peatland restoration has been identified as an enhancement opportunity, which will be considered at project-level and supported by soil sampling and survey data. Proposals to restore peat will be coordinated across the natural capital proposals to deliver environmental benefits and the habitat restoration and enhancement proposals to deliver BNG.
26	26/04/2021	NE	3.3 Consultation table 2 Water	"Is the option likely to contribute to or conflict with the achievement of WFD or other statutory (e.g., protected site) objectives?"	Findings from the WFD assessments will be included in the SEA process	"Is the option likely to contribute to or conflict with the achievement of WFD objectives?" is outlined within the Environment Report in Section 6 and 7.
27	26/04/2021	NE	3.3 Consultation table 2 Water	Suggested New Criteria: Will the option contribute to a resilient water supply, e.g., capture, storage, and use of excess flood water?	It is considered that these issues will be covered within the existing criteria.	No cross-reference to documents required.
28	26/04/2021	NE	3.3 Consultation table 2 Water	"Monitor and provide information to consumers on drinking water quality" is not clearly covered in the revised version.	Drinking water quality standards are set by regulation therefore the assessment will not report on these	No cross-reference to documents required.
29	26/04/2021	NE	3.3 Consultation table 2 Water Criteria	Suggested New Criteria: Will the option affect the longitudinal, lateral and vertical movement and exchange of water and the ecotone/hydrosere formation and function?	This detail is unlikely to be effectively assessable at the SEA scale and would need to be looked at within a subsequent more detailed level of assessment.	No cross-reference to documents required.

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30	26/04/2021	NE	3.3 Consultation table 2 Soil Objectives	Will the Natural Capital assessment on impacts of food provision address geodiversity adequately? Does geodiversity need a standalone assessment?	The assessment of the creation of soils is not included as part of Natural Capital, it is not considered that geodiversity is a major risk / opportunity related to the WRMP to justify its addition and inclusion.	No cross-reference to documents required.
31	26/04/2021	NE	3.3 Consultation table 2 Climatic Factors Objectives	Will the option affect carbon sequestration, including impacts on wetting / drying, restoration or formation of peat?	Impacts on peatlands will be considered	Carbon sequestration considered as part of the Biodiversity net gain and natural capital assessment. Peatland restoration has been identified as an enhancement opportunity, which will be considered at the project-level and supported by soil sampling and survey data. Proposals to restore peat will be coordinated across the natural capital proposals to deliver environmental benefits and the habitat restoration and enhancement proposals to deliver BNG.
32	26/04/2021	NE	3.3 Consultation table 2 Climatic Factors Objectives	Suggested New Criteria: Will the option affect the capacity for priority habitats and species to move or adapt in response to climate change?	This wording will be added under the assessment questions/ sub-themes section within the Biodiversity, Flora and Fauna topic	"Will the option affect the capacity for priority habitats and species to move or adapt in response to climate change?" is included as a sub-theme of the biodiversity related objectives. This is outlined within Section 4 in the Environmental Report.
33	26/04/2021	NE	3.3 Consultation table 2 Landscape Proposed objectives	"To conserve, protect and enhance landscape and townscape character and visual amenity" Include green infrastructure as an objective is crucial and not only included as a criterium	Wording could be added into assessment, see row below.	Objective 21 is "To avoid negative effects on built assets and infrastructure (including green infrastructure)". Sub-themes of the biodiversity objectives include: "Are there any opportunities for habitat creation or restoration?".

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34	26/04/2021	NE	3.3 Consultation table 2 Material assets Proposed objectives	As above: Including and green infrastructure as an objective is crucial. I suggest: "To avoid negative effects on built assets and infrastructure and to create green infrastructure."	NE recommend the inclusion of green infrastructure related objective twice - here and in row 35 (re: the Landscape SEA Objective). NE also indicate they do not feel just adding it as a criterium is sufficient. We will <b>amend the second Material Assets SEA Objective to include consideration of Green Infrastructure</b> , as proposed in the NE wording.	This is outlined within Section 4 in the Environmental Report.  Objective 21 is "To avoid negative effects on built assets and infrastructure (including green infrastructure)". Sub-themes of the biodiversity objectives include: "Are there any opportunities for habitat creation or restoration?". This is outlined within Section 4 in the Environmental Report.
35	26/04/2021	NE	3.3 Consultation table 2 Material assets Criteria	Will the option support the creation of or provide a potential for development of green infrastructure?	Given the amendment of the Material Assets SEA Objective discussed above (row 36) it would seem sensible to <b>adopt NE's proposed Green Infra assessment criteria (column F) into the relevant section of the SEA Framework</b> .	Objective 21 is "To avoid negative effects on built assets and infrastructure (including green infrastructure)". This is outlined within Section 4 in the Environmental Report.
<b>Historic England WRMP24 SEA Consultation Response received 27 April 2021</b>						
36		Historic England (HE)		The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside our Advice Note 8. Our advice note provides more guidance to developing a robust sustainability appraisal framework.	Noted.	Historic Environment objectives are included in the SEA Framework. Advice Note 8 is referenced in Section 1.2 of the Environmental Report.
37	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated	We agree that it is important to ensure consistency in approach between the Regional Plan and this WRMP.	Noted.	No cross-reference to documents required.

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			Environmental Assessment?			
38	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	However, it is important that each assessment can still be read as a stand-alone document – our concern with your approach in this scoping report is that you are relying very heavily on work previously done, and it is not always clear that you will take into account the full breadth of work. See, for example, our comments in relation to the Plans, Policies and Programmes below.	Noted. We recognise that the WRMP's Environmental Report will need to be its own standalone document containing all the necessary information in order for it to meet the requirements for an ER as set out in Schedule 2 of the SEA Regulations.	No cross-reference to documents required.
39	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Also, we are unsure about how many of our comments on your IEA from the WRE will necessarily be taken on board and to that end the extent to which we can agree to those principles being carried forward or indeed rely on the comments that we made on the IEA be translated into the work on this SEA.	Outcomes from the WRE consultation were fed back to stakeholders during a meeting in March 2021. A number of responses from Historic England were noted and amendments to the WRE methodology made as a result. For WRMP24 the SEA assessment criteria included in Consultation Table 2 of its SEA Scoping Report (as per suggestions below) had already been amended in line with HE comments issued to WRE, where appropriate.	No cross-reference to documents required.
40	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to	Therefore, we have some concerns regarding the apparent over-reliance on previous work and the fact that this Scoping cannot truly be read as a stand-alone report.	The approach taken was to provide a proportionate scoping exercise WRE having undertaken a very similar such exercise less than 3 months prior to Anglian Water's consultation. The assessments will require some integration, but the reporting of WRMP24's environmental assessments will be stand alone from WRE's IEA Reporting and include	No cross-reference to documents required.

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				that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	full coverage of Policies, Plans and Programmes alongside Anglian Water's WRMP24.  The <b>Anglian Water</b> WRMP24 Environment Report should be fully stand alone, rather than require the reader to cross reference content only included in WRE's EIA Report.	
41	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	We note that you have chosen not to repeat the long list of policies, plans and programmes in this consultation and are instead drawing on the documents identified in the WRMP19 SEA, Drought Plan 22 SES and most recent WRE IEA.	Noted.	Various policies, plans and programmes relevant to the historic environment are listed in Appendix C of the Environmental Report.
42	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	We note that you have provided a summary of the core Policy Plans and Programmes you will be considering in Table 3.1. WE would comment that there is nothing specific to the historic environment in this summary box and also there would appear to be an overemphasis on the County of Norfolk with little reference to other areas. WE appreciate that this is a summary but re concerned as to whether the full range and breadth of documents that should be referred to is being covered.	Please see the WRE PPP scoping report for the full PPP review, this will be updated, where relevant, and included as an Appendix to our WRMP24's SEA Environmental Report.	Various policies, plans and programmes relevant to the historic environment are listed in Appendix C of the Environmental Report.

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43	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Without a full list in this document, it is hard to tell whether the full range of documents we would expect to be included will be referenced. Therefore, for the sake of completion we have provided a checklist below for you to use in this assessment. It lists the key PPP that we would expect you to take account of in relation to the historic environment.	Noted.	Various policies, plans and programmes relevant to the historic environment are listed in Appendix C of the Environment Report.
44	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Environmental Baseline Context Again, we note that you are drawing upon earlier work in both the WRMP19 and WRE IEA in relation to baseline and key environmental issues. We appreciate that you are trying to avoid duplication of work. We note that summary box in section 3.2 includes a section on the historic environment	Noted.	No cross-reference to documents required.
45	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to	Designated Heritage Assets In terms of Baseline Information all designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, and Protected Wrecks) within the area should be identified. We therefore welcome reference to these in the	Settings of heritage assets will be referred to.	"Will the option affect the setting and/or significance of a historic asset?" is included as a sub-theme of the historic environment objective. This is outlined within Section 4 in the Environmental Report.



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			that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	summary box on page 19. We suggest that instead of 'sites and areas' you refer to designated 'heritage assets', the terminology used in the NPPF. Please also refer to protected wrecks. Please ensure that you refer to settings of heritage assets too throughout the report.		
46	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Mapping these assets provides a greater indication of their distribution and highlights sensitive areas. It would therefore be helpful to map assets (we note the references to GIS approach in the first and second para of section 3.2, page 18, which is welcomed but it would be helpful to actually publish the mapping).	The environmental report will contain summary mapping. On-going consultation and engagement with statutory consultees will allow opportunities to make the GIS system used in the assessment available for discussion in relation to specific options.	Mapping included in Appendix D: Baseline Review and Maps of the Environment Report.
47	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated	Non-Designated Heritage Assets We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings and buried archaeological sites. Please include these in the Scoping Report and the assessment. WE note the reference to the HER in the table on p19, but it would be helpful to specifically mention non-designated heritage assets here.	Within the SEA assessment heritage assets (designated and non-designated) will be considered. Where appropriate, comment will be provided on these within the SEA objective narrative. It is not feasible to list all thousands of HER records, but we will include text about the fact we recognise there are likely to be non-designated heritage sites. To consistently incorporate non-designated heritage assets across the Anglian Water WRMP24 area for inclusion in the SEA report the data would need to be obtained from HER data centres, this activity is not considered proportionate at this strategic	The full list of datasets used is included in Appendix D: Baseline Review and Maps of the Environment Report.

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			Environmental Assessment?		planning scale and is more commonly undertaken in the early stages of project pre-application as part of the EIA stage due to cost and complexity.	
48	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Reference to unknown heritage assets In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. Given the size of the study area there will definitely be unidentified heritage assets and archaeological remains. The unidentified heritage assets of the Region should be acknowledged and outlined in this section. It is important to note that previously unknown undesignated assets have the potential to be of national significance, on a similar level to that of a scheduled monument.	Within the SEA assessment unknown heritage assets will be considered. Where appropriate, comment will be provided on these within the SEA objective narrative. Note, there still remains the potential for unidentified heritage assets.	"Will the option affect the setting and/or significance of a historic asset?" is included as a sub-theme of the historic environment objective. This is outlined within Section 4 in the Environmental Report.
49	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Impacts on Hydrology and the Historic Environment It is important to consider how any changes to the hydrology may impact buried archaeological sites and the preservation conditions recorded on site, especially if there is the potential for organic remains to be preserved (artefacts and ecofacts). It is important to note that archaeology can also be present within a river. We would recommend that any cores collected through river deposits should also be assessed in terms of their archaeological potential in order to maximise the opportunities to understand the historic environment.	Within the SEA assessment the impact of hydrology on the historic environment will be considered. Where appropriate, comment will be provided on these within the SEA objective narrative. The second aspect surrounding cores is not appropriate at the SEA scale but could be incorporated during any subsequent EIA stage for options included in the final WRMP. Guidance text: Impacts to sensitive buried landscapes should be considered, including those that have waterlogged conditions suitable for the preservation of organic remains with palaeoenvironmental and geoarchaeological potential. These include lowland fens, mosslands and river deposits. These are sensitive to changes in hydrology. Opportunities to assess the geoarchaeological and palaeoenvironmental	No cross-reference to documents required.

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					potential of the landscape should be undertaken at an early stage of the process.	
50	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Heritage at Risk Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.	Noted.	Designated heritage assets are mapped in Appendix D of the Baseline Report. Non-designated heritage asset data has not been collected or mapped at this stage but will form part of the early assessment once schemes move to the project stage.
51	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Historic Landscapes As part of the baseline it should be understood that there is a historic character to the wider landscape and that the historic environment needs to be considered as part of a holistic whole; i.e. when considering 'Landscape' (paragraph 4.2.9) or 'Natural Capital' (4.2.11) there should be a recognition that areas under consideration are also cultural landscapes. For instance, the intertidal sediments mentioned as part of the coastal and marine habitats (p. 33) may also be of significant palaeoenvironmental interest.	Noted, historic landscape is considered within the SEA. The assessment also, notes that this is a specific Historic Environment Topic and not to be conflated with landscape assessment. Can advise and review text to ensure it is consistent.	"Will the option affect the setting and/or significance of a historic asset?" is included as a sub-theme of the historic environment objective. This is outlined within Section 4 in the Environmental Report. Section 6 and 7 include the assessment of the BVP and alternative plans.
52	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and	Other relevant sources of evidence Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists,	Noted.	No cross-reference to documents required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.		
53	27/04/2021	HE	Question 1 Do you agree with our planned approach to link WRMP24 SEA – and wider suite of environmental assessments – to that being applied by WRE's Regional Plan through its own Integrated Environmental Assessment?	Future baseline We welcome the references to the Ox-Cam Arc, East West Rail and the Government's levelling up agenda in this section. With specific reference to the historic environment, you could also include heritage at risk and also the potential for development to put pressure on heritage assets in their settings.	There is consideration of specific large housing developments/ allocations within the existing cumulative assessment methodology. Text "Future baseline developments and allocations may introduce changes to the setting or character of heritage assets that could impact their significance."	Included in Section 3.4 of the Environment Report.
54	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See Consultation Table 1).	Environmental Protection Objectives We would often refer to these as key sustainability issues. We broadly welcome the EPO for the Historic Environment although would suggest some slight changes to the wording to reference significance (see the suggested wording below). We note that many of the other topics have more than one objective. We therefore suggest that objectives for the historic environment should include	To keep the assessment proportionate, a number of assessments have fewer assessment criteria - which is determined based on the relative influence of the WRMP on their assets.	No cross-reference to documents required.

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55	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See Consultation Table 1).	Conserving and enhancing the significance of designated and non-designated heritage assets and (including any the contribution made to their significance by their settings	See response to comment 47 and 54.	No cross-reference to documents required.
56	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See Consultation Table 1).	Heritage assets at risk from neglect, decay, or development pressures;	See above text re: Comment 54.	No cross-reference to documents required.
57	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See Consultation Table 1).	Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it	See above text.	No cross-reference to documents required.
58	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See	Traffic congestion, air quality, noise pollution and other problems affecting the historic environment	See above text.	No cross-reference to documents required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			Consultation Table 1).			
59	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See Consultation Table 1).	Opportunities We would comment that the WRMP should not only minimise and reduce effects on heritage assets and their setting but should seek to avoid impacts in the first place and mitigate only where avoidance is not possible.	The first stage of the environmental assessments will screen to highlight any direct impacts on heritage assets and their settings with the aim that these can be avoided.	No cross-reference to documents required.
60	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See Consultation Table 1).	There may also be opportunities to enhance the historic environment. The interdisciplinary approaches cited within the document will provide an opportunity to enhance the historic environment. For example, the work in wetlands could increase our understanding of the use of these resources in the past as well as how the environment may have changed over time. There is also the opportunity to build in public engagement activities to help people understand and appreciate the landscape that they live in.	Opportunities will be considered as suggested.	"Will the option affect the setting and/or significance of a historic asset?" is included as a sub-theme of the historic environment objective. This is outlined within Section 4 in the Environmental Report. Section 6 and 7 include the assessment of the BVP and alternative plans.
61	27/04/2021	HE	Question 2 Do you have any comments, or additions, to the priority environmental objectives and opportunities? (See Consultation Table 1).	We welcome the fact that you have included reference to environmental opportunities in Table 1. However, this section should be amplified. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the SEA should highlight these opportunities. Example opportunities for the historic environment to include within the SEA can be found in our guidance notes in the links above.	Opportunities will be considered as suggested.	"Will the option affect the setting and/or significance of a historic asset?" is included as a sub-theme of the historic environment objective. This is outlined within Section 4 in the Environmental Report. Section 6 and 7 include the assessment of the BVP and alternative plans.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
62	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	Positive and Negative Effects of Construction and Operation We note that you are proposing four rows for each objective (p24) – positive and negative effects from construction, and positive and negative effects from operation	Noted.	This approach is adopted throughout the Environmental Report.
63	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	We welcome the separation of the construction and operational phases.	Noted.	This approach is adopted throughout the Environmental Report.
64	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite	We suggest that you may like to consider including neutral and also major and minor for the positive/negative effects.	Noted. This is already considered under the SEA methodology.	This approach is adopted throughout the Environmental Report.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			of environmental assessments? (See Consultation Table 2)			
65	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	There may clearly be an issue when multiple heritage assets are involved. An option may have some positive effects on some assets and negative effects on other assets. Simply adding together the effects and concluding a neutral effect would be an unacceptable approach. It will be important to consider how you will deal with such situations.	The SEA is assessed and reported independently for positive and negative effects. In this example there would be a negative score (minor, moderate major) and a positive score (minor, moderate, major). No adding together will occur - which will negate the cancelling out of effects.	This approach is adopted throughout the Environment Report.
66	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	In addition, it should be noted that undesignated remains could potentially be of demonstrable equivalent significance to designated heritage assets of national importance. So, the attribution of level of effect should be investigated on a case-by case basis.	Noted.	No cross-reference to documents required.
67	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives,	It is particularly important to recognise that given the large geographical area covered by the scoping, there is the potential for previously unknown heritage assets to be encountered.	Noted.	No cross-reference to documents required.



No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)			
68	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	Please consider also using some of the assessment criteria questions that we set out below.	Noted.	No cross-reference to documents required.
69	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	It will also be important to align criteria with other regions.	Noted - There are on-going inter regional discussion group meetings (chaired by WRE) that aim to bring consistency across regions.	No cross-reference to documents required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
70	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	Consultation Table 2 Objectives and Assessment Criteria (Questions) The objectives and questions for the historic environment identified on page 29 provide a helpful starting point	Noted.	No cross-reference to documents required.
71	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	In terms of the Main Proposed SEA Objective, there is currently no reference to significance or setting or to designated and non-designated heritage assets. We suggest the following wording:	See response to Row 73 below.	No cross-reference to documents required.
72	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite	Conserve/Protect and enhance the historic environment including the significance of designated and non-designated cultural heritage (including archaeology and built heritage), including any contribution made to that significance by setting.	From review of the assessment criteria it appears these issues are already taken into account. As such, <b>adapting the wording of the SEA Objective to align to that requested by HE would not appear to be a problem.</b>	No cross-reference to documents required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			of environmental assessments? (See Consultation Table 2)			
73	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	Whilst recognising that the number of objectives needs to be manageable (although we note there is only one objective for the historic environment and several for many of the other themes), we recommend the objectives below:	Beyond landscape + townscape, which is already covered in an existing assessment criteria, the remaining issues raised by HE appear more relevant to consideration at a project level, than those within a WRMP where location of option is based on availability of resource, rather than being more open such as site selection in a land use plan.  The issues raised will be of relevance to selected options and should be given consideration in project design of selected options brought forward by WRMP24.	No cross-reference to documents required.
74	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	Environmental Objectives <ul style="list-style-type: none"> <li>• Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place</li> <li>• Protect, manage and improve local environmental quality</li> <li>• Achieve high quality sustainable design for buildings, spaces and the public realm</li> </ul>	See Row 73 response	No cross-reference to documents required.
75	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives,	Social Objectives <ul style="list-style-type: none"> <li>• Improve and broaden access to the local historic environment</li> <li>• Provide better opportunities for people to</li> </ul>	See Row 73 response	No cross-reference to documents required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	understand local heritage and participate in cultural and leisure activities		
76	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	<p>Economic Objectives</p> <ul style="list-style-type: none"> <li>• Foster heritage-led regeneration and address heritage at risk</li> <li>• Optimise the use of previously developed land, buildings and existing infrastructure</li> <li>• Promote heritage-led sustainable tourism and increasing peoples understanding and enjoyment of the landscapes that they live in, and how they may have changed over time.</li> <li>• Support the sustainable use of historic farmsteads</li> </ul>	See Row 73 response	No cross-reference to documents required.
77	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	<p>The historic environment should also be brought into the different SEA objectives and questions, in the same way as other SEA topics (such as flora/fauna, soil etc.). For example:</p> <ul style="list-style-type: none"> <li>• Water – will the option impact the preservation of a waterlogged archaeological site?</li> <li>• Soil – Will the option impact the historic environment through issues such as contamination, changes to the preservation conditions on a site etc.</li> </ul>	<p>The assessment process considers interaction of impacts between topics as part of the assessment; as such these issues should be picked up under the existing heritage assessment criteria.</p> <p>Additionally, consideration of the preservation of water dependent heritage assets is already an assessment criteria under the existing Historic Environment SEA objective. As such, the issue appears to be included within the framework.</p>	No cross-reference to documents required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
78	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	Regarding decision making criteria/questions, we recommend the following examples of appropriate criteria	The decision-making criteria set out by HE are the complete set of examples listed in their Advice Note 8, which itself indicates that such criteria should be related to the “type and level of plan” and tailored to its SEA. Further some of the questions posed are already covered in other aspects of the SEA Framework – e.g. recreation, townscape character, etc.	No cross-reference to documents required.
79	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	Environmental: will the policy or proposal <ul style="list-style-type: none"> <li>• Conserve and/or enhance heritage assets, their setting and the wider historic environment?</li> <li>• Contribute to the better management of heritage assets and tackle heritage at risk?</li> <li>• Improve the quality and condition of the historic environment?</li> <li>• Respect, maintain and strengthen local character and distinctiveness?</li> <li>• Promote high quality design?</li> <li>• Integrate climate change mitigation and adaptation measures into the historic environment sensitively?</li> <li>• Alter the hydrological conditions of water-dependent heritage assets, including organic remains?</li> </ul>	See Row 73 and Row 78 response.	No cross-reference to documents required.
80	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives,	Social: will the policy or proposal <ul style="list-style-type: none"> <li>• Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?</li> </ul>	See Row 73 response	No cross reference to report required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
			assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	<ul style="list-style-type: none"> <li>• Improve the satisfaction of people with their neighbourhoods as places to live?</li> <li>• Engage communities in identifying culturally important features and areas?</li> <li>• Provide for increased access to and enjoyment of the historic environment?</li> <li>• Provide for increased understanding and interpretation of the historic environment?</li> <li>• Provide new leisure, recreational, or cultural activities?</li> <li>• Support and widen community uses through shared facilities?</li> </ul>		
81	27/04/2021	HE	Question 3. Do you have any comments on our SEA framework – objectives, assessment criteria and planned use of the findings from WRMP24s wider suite of environmental assessments? (See Consultation Table 2)	<p>Economic: will the policy or proposal</p> <ul style="list-style-type: none"> <li>• Increase the economic benefit derived from the historic environment?</li> <li>• Promote heritage-led regeneration?</li> <li>• Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design?</li> <li>• Make the best use of existing buildings and physical infrastructure?</li> <li>• Promote heritage based sustainable tourism?</li> <li>• Ensure that repair and maintenance is sympathetic to local character?</li> <li>• Help to reduce the number of vacant buildings through adaptive re-use?</li> </ul>	See Row 73 response	No cross reference to report required.
82	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	<p>Historic Environment Policy in WRMP 24</p> <p>It will be important for the Plan to include a policy for the Historic Environment that covers both designated and non-designated heritage assets and issues of setting and significance.</p>	See Row 73 response.	No cross reference to report required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
83	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Sustainability Indicators We suggest that you also include Sustainability Indicators in the Assessment. Our advice note 'Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment' (2016) provides advice on indicators and data sources in Paragraphs 2.13 – 2.17 of our advice note (see links above).	Noted, we will review the advice note as part of our assessment process.	This is referenced in both the Environmental Report and Appendix C.
84	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Method for Generation of Alternatives The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage.	The historic environment will be considered when considering other proposals.	No cross reference to report required.
85	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Avoiding Harm to the Historic Environment We would also remind you that the NPPF (para 32) is very clear that in terms of sustainable development harm to the historic environment should be avoided and wherever possible alternative options which reduce or eliminate such impacts should be pursued.	Noted.	No cross reference to report required.
86	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	NPPF Para 32: Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible,	Noted.	No cross reference to report required.

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
				alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).		
87	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Assessment process In the assessment of alternative sites, it is important that due weight is given to the potential harm to the historic environment.	The historic environment will be considered when considering other proposals.	No cross reference to report required.
88	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	We would advise against a purely distance based approach. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets.	The distance proximity is used as part of the initial assessment to identify potential effects. Once this has been undertaken the environmental assessment team will review effects that may not have been captured purely by using a distance approach.	When assessed in the SEA, effects other than those based on distance have been considered (where appropriate). Given the strategic nature of the plan and early-development of options, the assessment approach is considered proportionate. Nevertheless, for those options selected, a detailed heritage appraisal (including site visits) would likely be undertaken as part of the planning requirements.
89	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. The application of a standard proximity test (e.g. is the site within a set distance of a heritage asset) should not be used as it can lead to misleading results.	The distance proximity is used as part of the initial assessment to identify potential effects. Once this has been undertaken the environmental assessment team will review effects that may not have been captured purely by using a distance and visual approach.	When assessed in the SEA, effects other than those based on distance have been considered (where appropriate). Given the strategic nature of the plan and early-development of options, the assessment approach is considered proportionate.



No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
						Nevertheless, for those options selected, a detailed heritage appraisal (including site visits) would likely be undertaken as part of the planning requirements.
90	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	A simple matrices approach is not considered sufficient. We would want to see a narrative-based approach that properly considers more nuanced issues in relation to setting and significance of both designated and non-designated heritage assets.	The matrix is used as part of the assessment, a narrative is also provided alongside this to describe the impact.	Assessment spreadsheets include narrative alongside score.
91	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Understanding linkages with overall Best Value Planning for WRMP24 Page 15 of the consultation material provides helpful background in relation to Best Value Planning.	Noted.	No cross-reference to documents required.
92	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	We note that the specific examples given on page 15 all relate to the natural environment (e.g. natural capital and biodiversity net gain). However, there are clearly wider applications to other areas including the historic environment.	Noted.	No cross-reference to documents required.
93	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Essentially, we concur that it is important to look not only at the financial cost of any particular plan but more broadly and holistically at the best value plan that encompasses environmental factors including the natural and historic environment.	Noted.	No cross-reference to documents required.

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			to or planning approach to the SEA of WRMP24?			
94	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Conservation Teams/Archaeological Advisors We would also encourage you to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Strategic Environmental Assessment.	Noted.	This will be undertaken at a project level assessment and the historic environment approach is outlined within Section 4 of the Environmental Report.
95	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Noted.	This will be undertaken at a project level assessment and the historic environment approach is outlined within Section 4 of the Environmental Report.
96	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning approach to the SEA of WRMP24?	Finally, we should like to stress that this opinion is based on the information provided by you in this consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.	Noted.	No cross-reference to documents required.
97	27/04/2021	HE	4. Would you like to propose any improvements, or other comments, in relation to or planning	If you have any questions with regards to the comments made, then please do get back to me. In the meantime, we look forward to continuing to work with you and you colleagues.	Noted.	No cross-reference to documents required.

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approach to the SEA of WRMP24?						
<b>Environment Agency WRMP24 SEA Consultation Response received 30 April 2021</b>						
98	30/04/2021	Environment Agency (EA)	-	The in-combination assessment is crucial i.e. aligning to other water company plans and with other regional plans. E.g. The Trent, where multiple options could have a significant impact (and their assessment spread across several plans and Strategic Resource Options). Care should be taken, if all the companies and groups are expecting the other companies and groups to pick it up and things are missed.	Noted there are ongoing regional consolidation meetings to reduce the risk of impacts not being realised.	A cumulative assessment has been undertaken and is outlined within Section 8 of the Environment Report.
99	30/04/2021	EA	-	The WRE SEA/IEA and the Anglian Water WRMP24 SEA scoping document lack information on how the baseline will evolve. We expect this will be covered in the main SEA report, but it's more important than ever this round that we understand the difference that this suite of plan is making compared to the baseline (i.e. driving a more efficient and better value outcome).	This will be considered within the main environmental report.	The evolution of the baseline is outlined within Section 3 of Appendix D of the Baseline Report. Non-designated heritage asset data has not been collected or mapped at this stage but will form part of the early assessment once schemes move to the project stage.
100	30/04/2021	EA	-	The WRE SEA/IEA and the Anglian Water WRMP24 SEA scoping document lack information on how the baseline will evolve. We expect this will be covered in the main SEA report, but it's more important than ever this round that we understand the difference that this suite of plan is making compared to the baseline (i.e. driving a more efficient and better value outcome).	This will be covered within the main environmental report.	The evolution of the baseline is outlined within Section 3 of Appendix D of the Baseline Report. Non-designated heritage asset data has not been collected or mapped at this stage but will form part of the early assessment once schemes move to the project stage.
101	30/04/2021	EA	-	Carbon costing and accounting also seems to be an area of uncertainty. We have some concerns about this given it's a must do direction and it's unclear how much of an impact this could have on option selection (and if carbon will be a decision-making metric or not).	Carbon (GHG) accounting is a component of the C55 model applied by Anglian Water; as such, this process will not be repeated by the SEA, but seek to use the findings, as relevant.	A qualitative carbon assessment was undertaken as part of the SEA and this has been used to inform the Climate Change Objective. A quantitative carbon assessment was undertaken for the individual options as part of the C55

No.	Date	Organisation	Reference	Consultee Comment	SEA Consultant's Response (Autumn 2021)	Where addressed (Summer 2023)
						process, this was used as a metric in the investment model and directly influenced the selection of the plan. This is outlined in Section 4 of the Environment Report.
102	30/04/2021	EA	Specific to the scoping document (Page 17 Section 3.1)	The evolution of the plan and exactly what is consulted on is important. Furthermore if Anglian Water will be consulting on multiple different plans that could be selected. Each plan will need to be subject to SEA and in combination effects	Noted.	Each Plan has been subject to environmental assessment, including cumulative assessments. This is outlined within Section 8 of the Environmental Report.
103	30/04/2021	EA	Specific to the scoping document (Page 17 Section 3.1)	Anglian Water should consider adding other water company plans (for in-combination assessment) to the core list of PPP	This information is in the core set of plans referred to in WRE's IEA Scoping Report as indicated in Anglian Water's WRMP SEA Scoping Report and will be included in an Appendix of our draft WRMP Environmental Report.	Other water company plans have been included in Appendix C of the Environmental Report.
104	30/04/2021	EA	Specific to the scoping document (Page 17 Section 3.1)	Anglian Water should consider adding the National Planning Policy Framework to the core list of PPP.	See response to comment 103.	NPPF has been included in Appendix C of the Environmental Report.
105	30/04/2021	EA	Specific to the scoping document (Page 17 Section 3.1)	There are a number of Norfolk specific plans are mentioned here. This may suggest that these more relevant than those of other Local Authorities? Noted that this is from feedback for WRE but shouldn't assume WRE feedback is representative of Anglian Water's WRMP - it reflects who has responded to WRE consultation (noting NCC is a full member of WRE and other Local Authorities are not). As such Anglian Water must ensure its SEA and processes fully represent the breadth of its customer and stakeholder base.	Noted.	Local Plans and other relevant policy documents from across the Anglian Water region have been included in Appendix C of the Environmental Report.

