



STRATEGIC ENVIRONMENTAL ASSESSMENT – POST ADOPTION STATEMENT

Final Water Resources Management Plan (WRMP)
2024

Report for: South Staffordshire Water

Ricardo ref. ED14898

Issue: 1

18/10/2024

Customer:

South Staffordshire Water PLC (South Staffs Water)

Customer reference:

ZHY1167 Consultancy Support to Water Resources West (WRW) / South Staffs Water Water Resources Management Plan 2024 (WRMP24)

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1. INTRODUCTION

1.1 BACKGROUND TO THE WATER RESOURCE MANAGEMENT PLAN

Water companies in England and Wales are required to produce a Water Resources Management Plan (WRMP) every five years. The Plan sets out how the company intends to maintain the balance between supply and demand for water over the long-term planning horizon in order to ensure security of supply in each of the Water Resource Zones (WRZs) making up its supply area. The process includes calculating and forecasting how much water customers will need over the planning period (assessing demand) and how best to provide it (assessing options to reduce or constrain demand growth and/or augment reliable supplies of water) in an efficient, timely manner (programme appraisal). Companies seek to identify the preferred, 'best value' programme of demand management and water supply options to maintain a balance between reliable supply and demand within each WRZ and for their supply area as a whole (the WRMP).

South Staffs Water's draft WRMP was published for public consultation on 16 November 2022, accompanied by an Environmental Report to document the Strategic Environmental Assessment (SEA) of the draft WRMP. The consultation period lasted 14 weeks and closed on 22 February 2023. Following comments on the draft WRMP24 and SEA Environmental Report, a Statement of Response was prepared by South Staffs Water, setting out how it intended to take account of the comments received in producing a Final WRMP for the Secretary of State's approval. The Statement of Response was published alongside a revised draft WRMP and Environmental Report on 17 May 2023.

In developing its WRMP24, South Staffs Water examined the future forecast water supply/demand balance and determined how any deficits between forecast demand and reliable water supplies should be addressed for the selected planning period (25 years).

South Staffs Water received permission to publish the WRMP as final via a letter dated 21 August 2024. Following this, the Final WRMP and associated environmental assessment reports were published on 18 October 2024. This SEA Post Adoption Statement refers to the Final WRMP.

1.2 THE SEA PROCESS TO DATE

The WRMP has been subject to SEA in compliance with the SEA Regulations¹. This SEA Post Adoption Statement was produced in accordance with the provisions of Regulation 16.

Engagement with government, regulators, other licensed water suppliers and water companies, customers and a wide range of stakeholders is key to the WRMP process. South Staffs Water's WRMP24 consultation programme commenced in 2021 and included a wide range of stakeholders and the regulators. The SEA process for South Staffs Water's WRMP started in early 2021 and ran in parallel with the development of the WRMP as well as the Water Resources West (WRW) Regional Plan. An Environmental Report was produced alongside the draft WRMP.

The assessment stage of the SEA process was repeated for each revision of the WRMP up to and including the Final WRMP24 to ensure that the findings of the Environmental Report remained relevant to the plan. This is in accordance with the Government's SEA Guidance² which states:

'It is important to keep the implications for the Environmental Report under review to ensure that it remains consistent with the plan or programme on which opinions are being sought.'

The SEA has been undertaken in parallel with the Habitats Regulations Assessment (HRA) and Water Framework Directive (WFD), Biodiversity Net Gain (BNG), Natural Capital (NCA) and Invasive Non-

¹ The Environmental Assessment of Plans and Programmes Regulations, 2004 (UK Statutory Instrument No. 1633)

² Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive

native Species (INNS) assessment to ensure an integrated approach to environmental assessment of the WRMP24.

1.3 PURPOSE OF THE SEA POST ADOPTION STATEMENT

This SEA Post Adoption Statement is produced in accordance with the provisions of Part 4 of the SEA Regulations. In accordance with Regulation 16 of the SEA Regulations, this SEA Post Adoption Statement describes:

- How environmental considerations have been integrated into the Final WRMP (Section 2)
- How the Environmental Report has been taken into account (Section 3)
- How responses to consultation have been taken into account (Section 4)
- Reasons for choosing the Final WRMP as adopted, and why other reasonable alternatives were rejected (Section 5)
- The measures that are to be taken to monitor the significant environmental effects of implementation of the Final WRMP (Section 6).

2. HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE FINAL WRMP

WRMPs are developed to ensure a reliable, secure water supply over at least a 25-year planning period and that the measures proposed to maintain the balance between supply and demand for water provide value for money to South Staff Water's customers, whilst taking account of environmental and social effects. The SEA, along with the findings of the HRA, WFD, NCA, BNG and INNS assessments, have been used to help inform the development of the WRMP24.

2.1 OPTION DEVELOPMENT

South Staffs Water completed a process of option screening using screening criteria, developed in conjunction with WRW core member companies and stakeholders to inform option selection and development. These were applied at two stages of option development:

1. High-level screening of unconstrained options
2. Detailed screening of feasible options

Options development for WRMP24 has followed a dual streamed process from 'unconstrained' through to 'feasible' options, in tandem with SEA. From the outset of developing the alternative options to be considered for the WRMP24, SEA principles were used to carry out a high-level screening assessment of the options in the 'unconstrained' list. This included consideration of several key environmental criteria including whether the option would cause unmitigable damage to a site designated under the Habitats Regulations (SAC/SPA/Ramsar), a nationally designated site (SSSI/NNR/National Park/Ancient Woodland) or a site with significant heritage or visual amenity value (e.g. Scheduled Monument or AONB/National Landscape). This screening helped identify several options that would likely lead to unacceptable negative effects on the environment or society; these options were therefore excluded from further consideration (resulting in the 'constrained' list).

Those options that were assessed as suitable to be taken through to the 'feasible' list were scoped and subject to engineering and environmental appraisal to enable derivation of capital and operating costs, an understanding of environmental and social impacts and assessment against the SEA objectives. SEA was undertaken on all feasible options, for both supply and demand. Additional environmental assessments (HRA, WFD, BNG, NCA and INNS assessments) were undertaken for all feasible supply options. This was not possible for demand options, due to their nature and lack of location-specific information.

Detailed screening during the WRMP process included a criterion that explicitly used the findings of the SEA, in terms of outputs from the feasible option options assessments "*Does the option meet the social and environmental objectives of the relevant SEA?*". This led to 16 options being screened in and eight options being screened out. The reasons for screening options out at this stage included; potential significant negative effects on biodiversity, potential for deterioration in the context of WFD, potentially significant INNS transfer risks and significant effects on designated landscapes and cultural heritage assets.

2.2 DEVELOPING THE WRMP24

For WRMP24, South Staffs Water took a Best Value Planning (BVP) approach to develop the preferred plan, whilst also ensuring alignment with other companies in their regional planning area, WRW, to ensure the regional plan was valid. As a result, a multi-criteria decision analysis (MCDA) tool was developed which would allow all companies in WRW to assess the value of options as well as produce a best value plan to resolve the challenges in each respective company and the region overall. The tool is known as "ValueStream" and is explained in further detail in Section 9 of the WRMP.

The value criteria (metrics) used in ValueStream (**Table 2.1**) were agreed through workshops carried out by WRW. Four out of the eight metrics used had some input from the SEA process. The SEA objectives were mapped onto the decision-making metrics, as follows:

- Flood risk (SEA Objective 7);
- Human and social wellbeing (SEA Objectives 8, 10, 11, 12, 13, 16, 17);
- Sustainable natural resources (SEA Objectives 1, 2, 3, 4 and 15); and
- Multi-abstractor benefits (SEA Objectives 5, 6 and 14).

For each feasible option, the assessment of effects for each SEA objective were used to provide data for input to the ValueStream1 workbook. ValueStream1 uses solving algorithms to minimise overall costs, including environmental and social costs, while generating a scheduled plan which meets South Staffs Water's supply-demand balance. Best-value scores were multiplied by weightings taking into account customer preferences, and the resulting scores were used in the optimisation.

Table 2.1 Metrics used in development of WRMP (those where the SEA has provided input are highlighted in blue)

Ref.	Metric Name	Description
1	Cost	Assessed by water companies. Total net present value (NPV) based on capital expenditure (CAPEX) and operational expenditure (OPEX).
2	PWS drought resilience	Assessed by water companies. Supply-demand balance change at 1 in 500 level.
3	Carbon costs	Assessed by water companies. Total NPV of monetised carbon costs.
4	Flood risk	Assessment from SEA.
5	Human and social well-being	Assessment from SEA. Covering health, human environment, social and economic wellbeing, cultural heritage, air quality assessments.
6	Sustainable natural resources	Assessment from SEA, NCA and BNG
7	PWS customer supply resilience	Assessment by water companies. Customer valuations of willingness to pay (WTP) NPV, including supply interruptions.
8	Multi-abstractor benefits	Assessment from SEA. Water quality and quantity, water resources.

Broadly, proposed options that seek to minimise demand, increase efficiencies and decrease leakages are less intrusive and have fewer negative environmental effects; however, are not of sufficient scale to meet future water resource demands, taking into account future challenges. Supply-side options that seek to maximise existing operational efficiencies tend also to be associated with few or minor negative effects, although consequences from any reduced flows in rivers and water bodies need also to be considered. As the scale of infrastructure requirements increases, there are consequential increases in the magnitude and significance of positive and negative effects. As reflected in the ValueStream1 process, these then led to the preferential selection of demand management, leakage and efficiency options with a limited number of supply side options representing best value options.

South Staffs Water's WRMP24 does not require any supply options during the planning period of 2025 to 2050 to meet the deficit in the preferred plan because the required level of savings are met by the proposed demand management programme. However, the company has explored a wide range of

supply options in parallel and tested both demand and supply options to ensure the preferred plan delivers the best value for both customers and the environment.

The likely scale of negative and positive environmental and social effects for each option were considered, both in the context of a single option but also in combination with the other options included in the programme. The potential effects in combination with any other relevant projects, plans or programmes (for example, any planned major infrastructure schemes that may be constructed and/or operated at the same time and affecting the same environment and/or communities) were also assessed. This appraisal of each alternative programme also included consideration of the potential for any regulatory compliance risks associated with the Habitats Regulations and WFD, as well as other statutory obligations (including effects on SSSIs, National Parks, AONBs (now known as National Landscapes) and heritage features).

These assessments, together with the consultation responses to the draft WRMP24, helped to determine the appropriate programme for inclusion in the final WRMP24 preferred programme.

The HRA concluded that the preferred programme of the Final WRMP24 is compliant with the Habitats Regulations, with no likely significant effects (LSE) on European sites anticipated. The WFD assessment demonstrated compliance with WFD objectives and statutory requirements for the Final WRMP24 preferred programme.

3. HOW FINDINGS OF THE ENVIRONMENTAL REPORT HAVE BEEN TAKEN INTO ACCOUNT

The Environmental Report and the WRMP24 were developed in parallel so that the SEA process could actively inform the development of the WRMP24. **Table 3.1** identifies the main findings and outputs of the Environmental Report which informed the development of the draft WRMP24 and subsequently the Final WRMP24.

Table 3.1 Environmental Report Findings and Consideration in the WRMP24

Finding/Output	Integration into the WRMP24
<p>Options and Programme Effects</p> <p>Screening of options included consideration of SEA topics as well as risks to WFD water body status and the risk of any likely significant effects on sites designated under the Habitats Regulations.</p>	<p>A high level screening assessment of the options in the ‘unconstrained’ list eliminated eight options with the justification that they would have unacceptable negative environmental effects, were too politically or socio-economically unacceptable or there was not enough information to support the option. This included options such as new groundwater sources or groundwater enhancement schemes. Feedback from the EA regarding groundwater availability in these catchments resulted in these options being removed from the feasible option list.</p> <p>Different scenarios were considered in the selection of best value options and to confirm sensitivities and dependencies within the decision-making process. This led to the review of the treatment and scoring of operational flood risk (arising from increased catchment storage associated with reservoir raising and provision) as well as threshold values for water resources (when some schemes were providing benefits below 0.01Ml/d). In both instances, this led to further revisions of the SEA findings, and use of the updated assessment in the development of the WRMP.</p>
<p>Individual option assessments were undertaken according to the SEA assessment framework. Potential cumulative scheme effects were also identified. On the basis of these assessments, recommendations were made as to which options should be considered for inclusion in alternative programmes or excluded.</p>	<p>The WRMP24 preferred plan does not require any supply options during the planning period of 2025 to 2050 in order to meet the deficit. The ambitious demand management programme described above provides the 74 Ml/d of savings.</p> <p>The SEA confirmed that no significant negative effects have been identified for any of the SEA Objectives and no negative effects are anticipated during operation of the options. The preferred plan was found to be WFD compliant</p>

Finding/Output	Integration into the WRMP24
	and the HRA concluded no effects on designated sites.
<p>In the event of underachieving demand reduction by 50% or more, the plan will adopt an adaptive pathway which will include supply option 2.2.2.1 Blithfield Reservoir – 2m raising to avoid a deficit.</p> <p>A cumulative assessment of the adaptive pathway (which includes additional supply option 2.2.2.1). was undertaken alongside the preferred programme. This enabled a comparison of environmental performance against each SEA objective to be made.</p>	<p>If the adaptive pathway is adopted, the plan is expected to have a more notable negative effect compared to the preferred plan. This will generate significant negative effects across SEA objectives including biodiversity (SEA Objective 1), greenhouse gas emissions (SEA Objective 9), tourism and recreation (SEA Objective 12), waste and resource use (SEA Objective 15). However, significant positive effects would be anticipated for climate resilience (SEA Objective 10), economy (SEA Objective 11) and human health and wellbeing (SEA Objective 13). With appropriate mitigation measures, the HRA concluded no adverse effects on conservation objectives or site integrity are considered likely. The WFD assessed Option 2.2.2.1 as WFD compliant with a low confidence rating likely to improve with further investigation.</p>
Mitigation of the Final WRMP24 schemes	
<p>The preferred plan consists of demand options only which are limited to minor construction works only relating to minor pipe work/repairs.</p>	<p>It is unlikely that mitigation and enhancement measures will need to be implemented as only minor construction works are anticipated relating to the water efficiency demand option (minor pipe work/repairs). As the location of works is not yet confirmed potential effects of the preferred programme will be subject to further investigation once locations are confirmed. If any mitigation measures are considered necessary to take forward after further investigation, then this should be consolidated into a Construction Environmental Management Plan (CEMP) for the scheme, noting that all works should be carried out in accordance with relevant Construction Design Management (CDM) Regulations 2015.</p>
<p>Effects on air quality and greenhouse gas emissions: many of the schemes were identified as resulting in minor negative effects associated with construction works, operational vehicle movements and operational energy use.</p>	<p>Where negative effects are associated with air quality and emissions to sensitive areas (e.g. AQMA designations), mitigation measures such as vehicle emission control, effective logistical organisation and selection of appropriate vehicle routes to minimise the potential effects can be implemented. Green energy procurement and green transport fleet activities can also mitigate the negative effects.</p>

As the WRMP24 preferred plan only includes demand management options, the related construction activities are likely to be discrete and implementation of mitigation measures during construction in relation to biodiversity, scheme design and planning, pollution prevention, air quality, human health and social and economic well-being, climate change and resource use and cultural heritage and landscape would only be considered likely in the event of adopting the adaptive pathway which includes supply option 2.2.2.1.

4. CONSULTATION ON THE SEA AND THE WRMP24

4.1 CONSULTATION PROCESS

The SEA Regulations require consultation at the scoping stage and on the SEA Environmental Report. Consultation with the statutory bodies defined by the Regulations is mandatory at both stages, although consultation with the public is only mandatory at the Environmental Report stage. The SEA Regulations define the statutory consultation bodies according to the spatial extent of the plan. If a plan will only affect England, the consultation bodies are the Environment Agency, Natural England and Historic England. If the plan may affect other parts of the UK, the consultation bodies are widened to reflect this. The Scoping Report was issued in April 2021 to the Environment Agency, Natural England and Historic England as part of the wider WRW SEA scoping process.

This Environmental Report underwent public consultation for 14 weeks between November 2022 and February 2023. It provided a useful reference point for consultees to express their views on South Staffs Water's draft WRMP24. South Staffs Water produced a revised draft WRMP24 (rdWRMP24) for submission alongside the Statement of Response in May 2023. An updated Environmental Report was produced to take account of stakeholder comments and support the submission of the rdWRMP24. This Environmental Report has since been updated to reflect South Staffs Waters need for an adaptive pathway in the event of underachieving demand reduction targets. This, along with an updated revised draft WRMP24 was submitted to the statutory consultation bodies in March 2024.

On 21 August 2024, South Staffs Water received permission to publish from the Secretary of State. The final WRMP24 and associated environmental assessments will be published in October 2024.

In conjunction with publishing the final WRMP24, this Post Adoption Statement will also be issued (to meet the requirements of SEA regulation 16 (4)) to demonstrate how SEA has influenced the overall development of the WRMP and will also document the consultation process.

Table 4.1 lists the main documents relating to the WRMP24 environmental assessments and provides their publication dates.

Table 4.1 Summary of WRMP24, SEA, HRA, WFD, INNS, BNG and NCA Documentation

Document	Date	Purpose
SEA Scoping Report	April 2021	Issued to public and statutory bodies as a vehicle for consultation on the scope and approach to SEA
Draft Water Resources Management Plan 2024 (WRMP24)	November 2021	Issued for formal consultation to understand the views and priorities of customers and stakeholders
SEA Environmental Report for the draft WRMP24	November 2021	Issued with the Draft WRMP to document the environmental assessments supporting the Draft WRMP24.
HRA Report for Draft WRMP24	November 2021	Issued to fulfil Habitats Regulations requirements for the draft WRMP24
WFD Compliance Assessment Report for Draft WRMP24	November 2021	Produced to fulfil WFD objectives and statutory requirements for the draft WRMP24
INNS Assessment Report for Draft WRMP24	November 2021	Produced to support the Draft WRMP24

Document	Date	Purpose
Biodiversity Net Gain and Natural Capital Assessment Report for Draft WRMP24	November 2021	Produced to support the Draft WRMP24
Statement of Response (SoR)	May 2023	Responded to the comments received from consultation on the Draft WRMP24, including those relating to SEA and HRA (referred to below)
Revised draft WRMP24	May 2023	Amended to take account of the changes made as a result of the public consultation. This also included updates to the draft environmental assessment reports as above.
Secretary of State letter of approval for WRMP24	August 2024	Instruction to publish Final WRMP24 in accordance with Regulation 6 of the Water Resources Management Plan Regulation 2007
Final WRMP24	October 2024	Final WRMP24 published.
SEA Environmental Report for the Final WRMP24	October 2024	Produced with the Final WRMP24 to document the environmental assessments supporting the Final WRMP24
HRA Report for the Final WRMP24	October 2024	Produced to fulfil Habitats Directive requirements for the Final WRMP24
WFD Compliance Assessment Report for Final WRMP24	October 2024	Produced to fulfil WFD objectives and statutory requirements for the Final WRMP24
INNS Assessment Report for Draft WRMP24	October 2024	Produced to support the Final WRMP24
Biodiversity Net Gain and Natural Capital Assessment Report for Draft WRMP24	October 2024	Produced to support the Final WRMP24
SEA Post Adoption Statement	October 2024	This document – which sets out how the SEA and any views expressed by the consultation bodies or the public have influenced the Final WRMP24

4.2 RESPONSES TO THE CONSULTATION ON THE DRAFT WRMP24 AND HOW THEY HAVE BEEN TAKEN INTO ACCOUNT

The responses to the consultation on the draft WRMP24 which relate to the SEA HRA and WFD are included in the Statement of Response published on South Staffs Water's website:

<https://www.south-staffs-water.co.uk/media/pyfnu3qg/sst-dwrmp24-statement-of-response-v2-feb2024.pdf>

Table 4.2 and **Table 4.3** provide a summary of the representations made by the Environment Agency and Natural England that relate to the SEA and the resulting responses and changes as set out in the SoR and subsequent revision of the SEA Environmental Report.

The Environmental Report, HRA Report and WFD Compliance Assessment Report for the Final WRMP24 took account of the comments made by consultees and the Statement of Response.

Table 4.2 Environment Agency representations made on the Draft WRMP24 relating to the SEA of the WRMP (adapted from South Staffs Water's SoR)

Comment	Implications	Information or changes required	Response (as documented in the SoR)
<p>The SEA has assessed feasible options (which in part make up alternative options) as well as preferred options. The feasible options have followed the proposed methodology. Section 5.3 sets out how the SEA findings for the feasible options have been used as inputs to Multi-Criteria Analysis (MCA) detailed screening, scenario testing and, selection of the preferred programme of options. This makes it very clear how the preferred options have been selected. The EA requires that the Best Value, Least Cost and Best Environmental and Social alternative plans are considered in the SEA. Despite this, the Environmental Report does not consider alternative plans. Section 6.4 states 'The deficit for any reasonable alternative scenarios is still resolved through the demand side options alone and hence no further cumulative assessment has been undertaken for alternative plans as they are similar to that of the preferred plan'. The justification for the arrival at the 'best value' preferred plan is weak.</p>	<p>This issue presents a significant compliance risk. The overall effectiveness of the plan is at risk without an assessment of plan alternatives and a clear understanding of why the preferred plan has been chosen in light of alternatives.</p> <p>Without the assessment of all plan alternatives, the SEA does not comply with the SEA Regulations. There is potential for legal challenge if all alternative options have not been assessed or the plan/SEA cannot fully justify why the preferred option has been chosen and whether the same outcomes could have been achieved with less harmful alternatives.</p>	<p>SSW must demonstrate that all plan-based alternatives have been assessed, which includes a least cost and best for society and environment. A more detailed summary needs to be provided to demonstrate why the 'best value' plan has been selected.</p>	<p>At draft plan stage, we included the demand management targets we expected to be confirmed in the Environment Act. By achieving these, there was no supply demand deficit. These targets have now been confirmed and therefore we have to include the delivery of these in our plan. As such, we still have no supply demand deficit in the planning period and therefore no alternative plan that includes supply options or variations of our existing options.</p> <p>We have included additional information on how we determined our best value demand side options and optimised our programme in section 9.6, and further specific information through chapter 10.1.</p> <p>Our section 10.7 on Adaptive Planning outlines our least cost and best social and environmental plans.</p> <p>Section 6.4 of the SEA Environmental Report has been updated to further reflect this position.</p>
<p>Appendix F and G set out the assessment matrices for the feasible and preferred options. These aren't detailed and only include a significance score with no justification. The assessment of both feasible and preferred options have been split into</p>	<p>The poor application of the method and omission of transboundary effect poses a significant compliance risk and could mean that there are significant effects that haven't been identified within the SEA.</p>	<p>The assessment should ensure that the proposed method is pulled through into the assessment. This includes identifying effect characteristics.</p>	<p>Detailed SEA matrices with further commentary and justification on assessment outcomes were published as separate Appendices to the Draft WRMP24 at consultation i.e. Appendix P8: Draft WRMP24 SEA Appendix 1 (feasible options) and Appendix P9: Draft WRMP24 SEA Appendix 2</p>

Comment	Implications	Information or changes required	Response (as documented in the SoR)
<p>construction positive and negative and operational positive and negative.</p> <p>The summary within the ER of feasible options is thorough, albeit difficult to follow at times, however, the summary of the preferred options is vague and lacks details. The assessment of feasible options seems well justified and the identification of significant effects (positive and negative) seem appropriate. Limited details on the three preferred options has been provided and the assessment summaries are vague, however, as only demand management options have been taken forward, this may well reflect their limited impact.</p> <p>Despite effect characteristics being identified within the methodology, these have not been carried forward into the assessment. Most notably for the feasible options, there have been no identified potential transboundary effects.</p> <p>Appendix P8 (Appendix 1) does include some further details on the options assessments, however, there is no reference to this appendix within the ER, nor does the appendix have a title page. The appendix has been included on South Staff's consultation page. It's</p>		<p>Further clarity should be provided in the Environmental Report to demonstrate no significant cross-boundary conflicts or issues that could affect the approval and adoption of the WRMP.</p> <p>Clarity should be provided as to whether Appendix P8 forms part of the Environmental Report and should therefore be referenced and read as part of the assessment.</p>	<p>(preferred options). For the rdWRMP24 we have now incorporated these detailed SEA matrices within the SEA Environmental Report i.e. Appendix F (Feasible options assessment matrices) and Appendix G (preferred plan options assessment matrices).</p> <p>The updated SEA Environmental Report Appendices F and G supersede Appendix P8 and Appendix P9. Appendices P8 and P9 will be removed.</p> <p>Transboundary effects have been considered throughout the assessment process however the locations of the feasible options suggest transboundary effects would be unlikely. There is more information and commentary on the option-level assessments in the SEA matrices (Appendices F and G). It is worth noting that there are no supply-side options in the preferred plan. Transboundary effects of the rdWRMP have also been considered through the cumulative assessment (Section 6.5) and this has been updated to reflect the publication of neighbouring water company and regional group WRMPs/Regional Plans.</p>

Comment	Implications	Information or changes required	Response (as documented in the SoR)
unclear whether the reader should be signposted to this appendix.			
<p>Appendix B outlines responses made by Water Resources West to comments made by statutory consultees on the SEA Scoping Report for the Water Resources West Regional Plan (WRWRP) and the component WRMP24s. Section 1.4.4 of the Environmental Report states that the Scoping Report for South Staffs WRMP24, as well as the WRW Regional Plan, were issued for consultation together in April 2021. Method statements for the SEA, HRA and WFD assessments were also issued to consultees.</p> <p>Appendix B summarises responses to comments made by Cadw, the Environment Agency, Natural England and Natural Resources Wales on the SEA Scoping Report. These comments are primarily geared towards the regional plan rather than the WRMP itself. It is therefore not always clear from the responses whether they have been addressed within the SSW WRMP SEA or the WRW SEA. Suggestions from the EA on inclusion of documents within the PPP review haven't been included.</p>	<p>There is uncertainty and a lack of clarity around how regulator comments at the scoping stage have been addressed in the environmental report and WRMP. This could make the prediction of potential significant effects more difficult and / or potentially result in non-compliance with national policy objectives around leaving the environment in a better place, improving resilience to drought and minimising interruptions to water supply.</p>	<p>Tables in Appendix B of the Environmental Report should be updated to signpost where comments received from the statutory consultees have been addressed within the WRMP and the SEA Environmental Report. This will ensure that all comments have been adequately addressed.</p>	<p>To ensure the methodologies were aligned across water company plans within WRW, a combined scoping report was produced and consulted on, along with individual appendices for each water company. All the comments received as part of this process fed into the drafting of the Environmental Report and any relating to a specific water company were included in their respective report(s). Only comments received in relation to the SSW environmental assessments are included in Appendix B. A column has been added to these tables to highlight where in the Environmental Report the comments have been addressed.</p> <p>In addition, we have reviewed the comments received at the scoping stage and ensured any recommended policy/plans/programmes have been captured in Appendix C and reflected on throughout the assessment</p>
<p>The main aims and content of the draft WRMP are outlined within the Environmental Report. The WRMP doesn't include any overarching objectives, hence the SEA does not</p>	<p>The lack of a clear outline of the main objectives in the WRMP makes the SEA not fully compliant with point 1 of Schedule 2 of the SEA regulations. However, this omission relates more</p>	<p>The WRMP must be updated to include plan objectives which then should also be included within the Environmental Report.</p>	<p>We have updated the revised draft WRMP to include our objectives and these are shown on page 16 in the chapter 2 summary. They are:</p>

Comment	Implications	Information or changes required	Response (as documented in the SoR)
<p>include these. Without a clear understanding of the plan's key objectives it is difficult to ascertain the appropriateness of the SEA objectives.</p>	<p>to the main WRMP document rather than the SEA Environmental Report.</p>		<ul style="list-style-type: none"> - Deliver a sustainable and resilient supply of water for both our household and non-household customers now and in the future. - Commit to reducing the amount of water we abstract from the environment over the lifetime of the plan in order to protect and enhance the natural environment in which we operate. - Identify the longer term uncertainties e.g. climate change, and, if required, provide adaptive pathways within the plan in order to ensure we can respond to future challenges. - Be acceptable and affordable for our customers. <p>Section 1.3.3 of the Environmental Report has been updated to include the key objectives for this plan.</p>
<p>The future baseline information is generic and applied at a regional scale rather than using information specific to SSW's supply area. For example, flooding is focussed at the regional scale, but it would be preferable to identify areas of significant flood risk within the WRMP operational area too. Old references to the 2019 National Planning Policy Framework (NPPF) should be removed and updated with the 2021 version of this.</p>	<p>Potential risk of not identifying and understanding the uncertainty of all issues in the future baseline and lack of longer term projections may affect decision making and the development of meaningful and robust objectives, solutions, and opportunities within the WRMP. Without considering how the local baseline will evolve in the future, it is not possible to properly assess how the implementation of the plan will affect it and there is a risk of the SEA not properly taking into account matters that are locally relevant and important.</p>	<p>The future baseline information should be made more specific to the WRMP supply area itself (for example on flood risk). References to the 2019 NPPF should be removed and updated with the 2021 version.</p>	<p>The predicted future environmental baseline aims to consider the future environmental changes to the baseline in the absence of the proposed WRMP. There are many challenges around this as the WRMP includes longer-term planning horizons (from 25 to up to 100 years for some plans) and there is considerable uncertainty around longer term changes to policies and plans, climate change and future land use etc. It is difficult to be area specific with some of these topics as the challenges faced are often applicable to a wider area and there are limited data available at this level of granularity. The UKWIR environmental assessment guidance states that only where there is some reliable evidence available to set out longer term changes (e.g. climate change projections from UKCP) that this should be reported. In addition, the environmental baseline was included in the original Scoping</p>

Comment	Implications	Information or changes required	Response (as documented in the SoR)
			<p>Report which was issued for consultation in 2021 where the statutory consultees were given opportunity to provide comment. It would be at this point where consultees would flag any concerns over the proposed methodology, including the baseline information used to inform the assessment framework. We would not look to update this before publication of the revised draft WRMP as any changes could change the overall assessments.</p> <p>Where references were made to the 2019 version of the NPPF, these have been updated to the 2021 version in the Environmental Report</p>
<p>The assessment takes into account the criteria for determining significance as well as effect characteristics as set out in Schedule I of the SEA regulations, namely the nature, timing and duration, geographical scale and location of effect, and the potential effect on vulnerable communities and sensitive sites. The thresholds for identifying these effect characteristics haven't been identified.</p>	<p>Although the methodology is comprehensive, without the provision of thresholds for the characteristics of effects, there is potential for significant effects to be missed within the assessment.</p>	<p>The WRMP SEA should be updated to include definitions for the characteristics of effects.</p>	<p>The thresholds used in the assessment are provided in Appendix E of the Environmental Report. This Appendix is signposted throughout the report.</p>
<p>SSW expects to monitor the effects of the WRMP alongside the other impacts of its operations and, as such, is likely to rely on existing sources of information that are collected either by SSW or by other relevant organisations such as the Environment Agency and Natural England.</p>	<p>Whilst some information on monitoring is provided, the Environmental Report fails to provide detail on all the matters in Regulation 17, most notably about making provision for remedial action in the event of unforeseen circumstances.</p>	<p>SSW should amend Table 7.1 to include further details about when the measures will be carried out, by who and how. Information should also be provided about what actions will be taken if unexpected significant effects are found during monitoring.</p>	<p>We note the requirement to be able to adequately deal with any unforeseen significant effects as a result of the plan, however, at this stage of the SEA it is not possible to set out any specific remedial action(s) as the effects themselves are unknown. Significant adverse effects as a result of implementing the preferred plan of demand measures are unlikely and not anticipated (this is as presented in the environmental assessment).</p>

Comment	Implications	Information or changes required	Response (as documented in the SoR)
<p>Table 7.1 identifies potential indicators for monitoring effects against each SEA objective, where the information can be sourced from and some commentary on the potential monitoring measure. Despite this, there is very limited detail on the actual monitoring measure including lack of explanation on what specifically needs to be done, how, by who and when. Table 7.1 indicates some of the issues currently monitored or which could be monitored in future, and how they relate to the SEA objectives used in the SEA of the draft WRMP24. This list is provisional and indicative only; monitoring proposals will be considered further and a final monitoring framework that satisfies the requirements of the SEA Regulation will be presented in the Post Adoption Statement. There is no information on trigger points and what action will be taken if unexpected significant effects are found during monitoring. As identified above, there may be some additional significant effects which haven't been identified, therefore it's not currently clear whether measures are appropriate.</p>			<p>There are no supply side options in the preferred plan and no adaptive / alternative plans. Section 7.4 of the Environmental Report sets out a provisional and indicative list of monitoring proposals and a final monitoring framework which satisfies the SEA Regulations will be set out in the Post Adoption Statement and published following the final WRMP. The SEA Directive states that monitoring must enable appropriate remedial action to be taken. For the monitoring programme to be effective, there must therefore be a mechanism in place to detect trends and to ensure that action is taken where trends are progressively adverse.</p> <p>Five-yearly assessment of monitoring and any measures taken would be included within the SEA for the subsequent cycles of WRMP development. Through the proposed monitoring and analysis of the results obtained over the five-year period, the SEA will inform and influence the development of the WRMP for future periods. Section 7.4 has also been updated to reflect this.</p>

Table 4.3 Natural England's representations made on the Draft WRMP24 relating to the SEA (as adapted from the SoR)

Comment	Response (as documented in the SoR)
<p>While the Severn Estuary may currently fall outside of the scope for the demand management options assessment on likely impacts, you should include consideration of impact to the Severn Estuary in your sites list and its designated features if you choose to move forward with the feasible options outlined in your WRMP.</p>	<p>For our revised draft plan we have updated our supply and demand forecasts. Our plan options have not changed in that we still do not require any supply options to meet the deficit in the planning period. However, we acknowledge that a plan based on demand management reductions alone carries a level of risk, and therefore we need to have robust monitoring and alternative pathways that can be triggered should the demand management activities not deliver the required reduction. We detail this further in section 10.2 of the revised draft plan which discusses how we will monitor our delivery, the alternative pathway and the work required for this. Our alternative pathway does not look at utilising an option that impacts on the Severn Estuary; however we have noted this requirement for any future work.</p>
<p>The SEA scoped feasible supply options and note the likely significant effects that would arise from these options supporting why SSW has chosen these options. However, an assessment of plan alternatives and a clear understanding of why the preferred plan has been chosen in light of alternatives has not been made and should be completed to be compliant with the SEA regulations.</p>	<p>At draft plan stage, we included the demand management targets we expected to be confirmed in the Environment Act. By achieving these, there was no supply demand deficit. These targets have now been confirmed and therefore we have to include the delivery of these in our plan. As such, we still have no supply demand deficit in the planning period and therefore no alternative plan that includes supply options or variations of our existing options. We have provided more detail around how we have optimised the activities within our plan in section 9.7.</p>
<p>As a donor company of bulk supply to various NAVs the company must ensure the relevant environmental assessments for these transfers have been undertaken, in relation to the bulk transfer and the supply abstractions, the SEA must be updated accordingly if any environmental impacts are identified from these sources/transfers.</p>	<p>Our draft WRMP stated that we were a donor company to a NAV in our area – however this is incorrect, and section 2.7 of the plan has been updated to reflect this.</p>
<p>As strengthened by the Environment Act 2021, public bodies have duty to: “further the conservation and enhancement of biodiversity” In the SEA Appendix D: Baseline analysis consideration has been made to the NERC act, and key issues relevant to the WRMP have been identified. Further explanation should be made to how these issues will be addressed in the final plan.</p>	<p>Section 10.8 details our broader AMP8 WINEP commitments, which include activities specifically related to biodiversity improvements. Supporting this, we are proposing to develop a 25 year environment plan for South Staffs Water that will align with the Government plan and detail our longer term objectives.</p>
<p>Landscapes and protected landscapes have been considered, and measures and considerations to mitigate impact upon landscape detailed.</p> <p>The full details on how this is to be achieved should be detailed also in the final report which is acknowledged in the ‘Next Steps’.</p>	<p>Comment noted. Where impacts to landscape are identified we will ensure appropriate detail is provided as to how these will be avoided or mitigated when implementing the WRMP. It is important to note that the SSW rdWRMP currently contains no supply options in the preferred plan therefore impacts on landscape are considered unlikely.</p>

5. RATIONALE FOR SELECTION OF OPTIONS FOR THE FINAL WRMP24

5.1 OPTION LEVEL ALTERNATIVES

All feasible list options, including both demand and supply options, were subject to assessment against the developed SEA framework. In this way, viable alternatives were assessed at the option level. This informed the evaluation of alternative programmes, and the assessment of potential cumulative effects between schemes.

5.2 PROGRAMME LEVEL ALTERNATIVES

Programme appraisal commenced with the generation of an optimised least-cost programme using a best value planning approach, including the MCDA tool “ValueStream” developed for WRMP24. This ensured alignment between company level WRMPs and the WRW Regional Plan. For each feasible option, the effects assessment for several SEA objectives was used to inform the decision-making metrics along with capital costs (CAPEX), operating costs (OPEX) and carbon cost data.

Programme appraisal in WRMP is the process by which the least-cost plan is refined to create the preferred plan. The process takes account of the environmental and social effects of each option identified by the SEA (as well as additional environmental assessments e.g. HRA, WFD, BNG, NCA and INNS assessments), as well as other factors, such as regulatory requirements, customer preferences, risk and reliability.

South Staffs Water’s proposed programme focuses solely on demand management measures to address the future supply deficits, with no requirement for supply options. This was determined to be the preferred plan and represents the most likely scenario.

Having reviewed the proposed programme, South Staffs Water investigated a series of alternative programmes through scenario testing to successfully demonstrate that the programme portfolio was effective and robust in meeting a range of future uncertainties. The plan was stress tested against various scenarios including if demand reduction activities only deliver 50% of their projected savings as well as the Ofwat compound low scenario (low climate change and environmental destination) and Ofwat compound high scenario (high climate change and environmental destination). Findings from the SEA (and associated HRA and WFD assessments) were used to consider the relative environmental performance of these different alternative programmes.

South Staffs Water concluded that in each scenario, there was no deficit in the planning period. It is acknowledged that the demand management measures include a number of key dependencies, including customer behaviour and government interventions. As a result, South Staffs Water included an adaptive pathway in their plan in the event the demand management measures do not achieve the projected savings. This pathway involves the introduction of supply option 2.2.2.1 (Increase storage at Blithfield – Increase dam height by 2m). The trigger point for this pathway would be 2028 with construction starting in 2029 and the option becoming online in 2036.

This option 2.2.2.1 has the potential for significant negative effects during construction on biodiversity (e.g. construction effects on wintering birds in a SSSI), greenhouse gas emissions (e.g. embodied carbon in materials required), tourism and recreation (e.g. the reservoir is an important recreational asset and access and enjoyment would be impeded) and waste and resources (e.g. significant amount of materials required with limited opportunity to re-use or recycle). The inclusion of this option in the preferred programme ensures other requirements, such as improving resilience to climate change, are met to a greater extent. Additionally, with the option potentially set for implementation in 2036, there is sufficient time in the subsequent WRMP cycle to investigate this option further.

6. MONITORING OF THE WRMP24

The SEA Regulations require the responsible authority to: *'monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.'*

Noting no significant effects were identified for the demand measures included in the preferred programme, monitoring will track the residual environmental effects to show whether they arise as anticipated in the SEA appraisal, to help identify any unforeseen negative impacts and trigger deployment of any of the mitigation measures as required.

Monitoring recommendations are based on the current understanding of the option design. As options set out in the Final WRMP24 are brought forward for development, further specific monitoring requirements may be incorporated at detailed design and in plans accompanying scheme development (including, where applicable, formal applications for any required environmental permits or abstraction licences, planning permission, as well as any scheme-specific HRA and WFD assessments) or in South Staffs Water's voluntary best-practice monitoring plans which accompany scheme development.

South Staffs Water will monitor the effects of the WRMP24 alongside the other impacts of its operations, and, as such, will likely rely on existing sources of information that are collected either by South Staffs Water or by other relevant organisations such as the Environment Agency or Natural England. For example, South Staffs Water already collects certain data for an annual review process (the Annual Performance Report) that is submitted to the Office of Water Services (Ofwat) and their own environmental reporting.

These monitoring indicators will form the core components of the monitoring programme to assess whether the identified effects in the SEA Environmental Report are occurring as anticipated, or whether it is giving rise to greater or lesser effects (positive or negative). In turn, the monitoring may identify changes to the mitigation measures necessary to minimise negative effects and/or modifications to scheme design or operation to further augment positive effects.

The monitoring plan (**Table 6.1**) will be owned and implemented by South Staffs Water and will be developed to reflect the temporal phasing of the WRMP24 delivery. The monitoring plan will be further developed beyond this Post-Adoption Statement during the implementation of the WRMP24 in consultation with the Environment Agency, Natural England and Historic England to make best use of available data, to share existing monitoring locations and locate new monitoring sites where possible in locations that not only meet scheme-specific requirements but provide additional value to the Environment Agency, Natural England and Historic England monitoring programmes (and other relevant bodies as appropriate).

Discussions will be held with relevant regulatory and statutory consultation bodies and stakeholders to agree the appropriate scale and duration of such scheme-specific monitoring activities proportionate to the assessed environmental risks. This also applies to the adaptive pathway which introduces supply option 2.2.2.1 which, if required, will be investigated further in the development of WRMP29. Site-specific monitoring requirements for the supply option 2.2.2.1, if implemented, will be developed at the detailed design stage (including scheme-specific HRA and WFD assessments) as part of the planning process closer to the time of implementation.

The implementation plan will include:

- Scheme-specific monitoring requirements and targets that focus on scheme-specific risks, habitats, species and sites; and
- Strategic, regional and local monitoring requirements and targets to ensure that monitoring is conducted at a suitable spatial scale that reflects the scale and risks of each scheme and the overall plan.

Five-yearly assessment of monitoring and any measures taken would be included within the SEA for the subsequent next WRMP development (required to be prepared every five years). Through the

proposed monitoring and analysis of the results obtained over the five-year period, the SEA will inform and influence the development of the next WRMP.

Table 6.1 Proposed Indicators for Monitoring Effects

SEA Objective	Potential Indicator	Source of Information	Commentary
1. To protect, restore and enhance biodiversity, including designated sites of nature conservation interest and protected habitats and species, enhance ecosystem resilience and habitat connectivity and deliver a net biodiversity gain.	Condition of specific protected sites (e.g. SACs, SPAs, SSSIs)	South Staffordshire Water (SSW), Environment Agency, Natural England (NE)	<p>Additionally, open communication between Environment Agency, NE and SSW results in up-to-date information and identification of any potential issues.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remediation actions. • Identify elimination and mitigation measures to enable activity to recommence with. • If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects.
2. To protect and enhance sustainable natural resources and the ecosystem services they provide.	Biological monitoring (macroinvertebrates, macrophytes, fisheries, bird surveys)	SSW, EA, Angling clubs, British Trust for Ornithology (BTO)	<p>Using data sets and comparing them against other monitored information such as levels and flows will assist in identifying whether there are any adverse effects and if mitigation measures are performing as well as expected.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remediation actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects.</p>
	Number and area of new or restored habitats	SSW	SSW could consider recording the number of locations and area of habitats created or restored
3. To avoid and, where required, manage invasive and non-native species (INNS).	INNS presence	SSW, NBN Atlas and the EA's Ecology & Fish Data Explorer website	<p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions

SEA Objective	Potential Indicator	Source of Information	Commentary
			If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects.
4. To protect and enhance soil quantity, quality and functionality and geodiversity and ensure the appropriate and efficient use of land.	Area of previously undeveloped land used during construction	SSW	SSW could record the area of previously undeveloped land that is built on as a result of the WRMP24 scheme (linked to biodiversity net gain/resilience assessment).
	Condition of sites designated for geological interest (e.g. geological SSSIs) on water industry land holdings	SSW, NE	<p>Previous studies may also be used to inform monitoring and assessment.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects.</p>
5. To protect and enhance surface and ground water levels and flows.	<p>River flows, river levels, lake and reservoir levels.</p> <p>Groundwater levels, recharge characteristics and abstracted groundwater quality</p>	SSW, EA	<p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects.</p>
6. To protect and enhance the quality of surface and groundwater resources.	Water quality of surface and ground water.	SSW, EA	<p>Previous studies may also be used to inform monitoring and assessment.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions, including expanding our catchment management activities and utilisation of nature based solutions. • Identify elimination and mitigation measures to enable activity to recommence with.

SEA Objective	Potential Indicator	Source of Information	Commentary
			<ul style="list-style-type: none"> Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects.</p>
7. To reduce or manage flood risk.	Number of properties that experience internal flooding from public sewers	SSW, EA	SSW could identify opportunities for Blithfield to provide flood mitigation support through balancing the level at certain times of the year.
8. To minimise emissions of pollutant gases and particulates and enhance air quality.	Number of vehicle movements/distance travelled	SSW	<p>SSW could consider recording the number of vehicle movements and distance travelled as an indicator of air quality impacts during implementation.</p> <p>SSW net zero plan aims to replace nearly all company vehicles with electric vehicles.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> Immediately identify root cause through detailed investigation. Identify remedial actions Implement actions Increase monitoring to demonstrate effectiveness of remedial actions
9. To reduce greenhouse gas emissions.	Quantity of greenhouse gas emissions per megalitre of water supplied.	SSW	<p>SSW can use company data, and guidance from the UKWIR greenhouse gas workbook and BEIS (Department for Business, Energy & Industrial Strategy) conversion factors to derive this information.</p> <p>SSW WRMP reduces GHG emissions and SSW net zero plan supports delivery of this measure.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> Immediately identify root cause through detailed investigation. Identify remedial actions Implement actions, including renewable energy, innovation, green process upgrades Increase monitoring to demonstrate effectiveness of remedial actions
	Energy use used in the operation of options.	SSW	SSW energy consumption data e.g. via accounts / invoices.

SEA Objective	Potential Indicator	Source of Information	Commentary
	Renewable energy generated or purchased.	SSW	SSW renewable energy generation data, in addition to data on renewable energy purchased e.g. via accounts / invoices. SSW net zero plan supports delivery of this measure.
10. To adapt and improve resilience to the threats of climate change.	Number of properties that experience internal flooding from public sewers	SSW, EA, NRW	SSW report this data to Ofwat as part of the statutory returns process. If unexpected significant effects are found during monitoring: <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects
11. To promote a sustainable economy and maintain and enhance the economic and social well-being of local communities.	Number of SSW sites with public access which provide sporting, recreational and leisure resources and number of visits per year.	SSW	SSW hold information on the number of annual visitors to sites where specific visitor facilities are provided. These could be analysed to determine effects of operation on visitor use.
	Planned residential new development (informing predicted growth forecast to target catchments requiring investigations for potential future capacity constraints).	SSW	SSW examine information on planned growth and forecasts across Local Planning Authorities within the area.
12. To maintain and enhance tourism and recreation.	Number of SSW sites with public access which provide sporting, recreational and leisure resources and number of visits per year.	SSW	

SEA Objective	Potential Indicator	Source of Information	Commentary
13. To protect and enhance human health and well-being.	Compliance with drinking water standards at customers' taps (%).	SSW	<p>SSW reports these data to Ofwat as part of the statutory returns process (Annual Performance Report) and to the Drinking Water Inspectorate.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects</p>
	Compliance with water quality standards under the EC Bathing Waters Directive.	Environment Agency	Environment Agency monitors the compliance of bathing waters and report this annually.
	Number of nuisance-related complaints e.g. noise, dust.	SSW	<p>SSW could record the number of nuisance-related complaints made in relation to implementation of the WRMP24.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects</p>
	Pollution and flooding Incidents	SSW, Environment Agency	<p>SSW measure the number of pollution incidents per year and monitor and report against discharge compliance.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions.

SEA Objective	Potential Indicator	Source of Information	Commentary
			<ul style="list-style-type: none"> Identify elimination and mitigation measures to enable activity to recommence with. Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects</p>
<p>14. To promote and enhance the sustainable and efficient use of resilient water resources.</p>	<p>Leakage</p> <p>Water saved through demand management/ water efficiency measures</p>	<p>SSW</p>	<p>SSW report these data to Ofwat as part of the annual returns process.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> Immediately identify root cause through detailed investigation. Upon determination, cease activity deemed to be the cause. Identify remedial actions. Identify new activities or adaptations to existing activities required in order to ensure we achieve this measure. Increase monitoring to demonstrate effectiveness of remedial actions
<p>15. To minimise waste, promote resource efficiency and move towards a circular economy.</p>	<p>Amount of recycled / reused materials used</p>	<p>SSW (contractors/consultants)</p>	<p>Information on the use of recycled / reused materials should be held by construction managers and accounts (contractors / consultants accounts, waste or procurement records).</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> Immediately identify root cause through detailed investigation. Upon determination, cease activity deemed to be the cause. Identify remedial actions. Identify elimination and mitigation measures to enable activity to recommence with. Increase monitoring to demonstrate effectiveness of remedial actions <p>If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects</p>
	<p>Proportion of waste sent to landfill</p>	<p>SSW (services data)</p>	<p>Information on waste disposal to landfill should be held by SSW.</p> <p>If unexpected significant effects are found during monitoring:</p> <ul style="list-style-type: none"> Immediately identify root cause through detailed investigation. Upon determination, cease activity deemed to be the cause. Identify remedial actions. Identify elimination and mitigation measures to enable activity to recommence with. Increase monitoring to demonstrate effectiveness of remedial actions

SEA Objective	Potential Indicator	Source of Information	Commentary
			If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects
	Chemical use in water treatment	SSW (services data)	Information (quantities, composition) on chemical use should be held in accounts. If unexpected significant effects are found during monitoring: <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination identify remedial actions – these will be both short term and long term actions. • Implement short term actions to ensure mitigation of issue. • Develop and implement long term remediation plan • Increase monitoring to demonstrate effectiveness of remedial actions
16. To conserve and enhance the historic environment including the significance of heritage assets and their settings and archaeological important sites.	Loss / damage or discovery / protection of cultural, historic and industrial heritage features.	SSW, Historic England	Historic England monitor the condition of all statutorily protected monuments. If unexpected significant effects are found during monitoring: <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects
17. To conserve, protect and enhance landscape and townscape character and visual amenity.	Loss or damage to landscape character and features of designated sites.	SSW	SSW could record the number and size of infrastructure built within designated landscape sites. If unexpected significant effects are found during monitoring: <ul style="list-style-type: none"> • Immediately identify root cause through detailed investigation. • Upon determination, cease activity deemed to be the cause. • Identify remedial actions. • Identify elimination and mitigation measures to enable activity to recommence with. • Increase monitoring to demonstrate effectiveness of remedial actions If this is not possible, alternative activities would be assessed in order to deliver the requirements without significant effects

7. AVAILABILITY OF DOCUMENTS

The adopted Final WRMP24 and accompanying final SEA Environmental Report are available on South Staffs website at:

<https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-management-plan/>

The documents are also available for inspection by appointment. To arrange an appointment please contact us by:

- Email to: wrmf.consultation@south-staffs-water.co.uk
- In writing to: Water Strategy, South Staffs Water, Green Lane, Walsall. WS2 7PD

If you would like to request copies of the Final WRMP24 or associated documentation, please use the email or postal address above.

APPENDICES

APPENDIX A - POST ADOPTION PROCEDURES

Part 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires South Staffs Water, 'as soon as is reasonably practicable' after the adoption of the WRMP24, to:

1. Make a copy of the Final WRMP24 and SEA Environmental Report available at its principal office for inspection by the public at all reasonable times and free of charge;
2. Notify the public and potentially affected parties of their availability;
3. Inform the statutory consultation bodies and other parties who responded;
4. Issue a statement containing:
 - How environmental considerations have been integrated into the WRMP24;
 - How the environmental report has been taken into account;
 - How consultation responses have been taken into account;
 - The reasons for choosing the WRMP as adopted;
 - Measures to monitor the significant environmental effects of the WRMP.

Requirements 1 to 3 have been fulfilled by the publication of the Final WRMP24 and SEA documents on South Staffs Water's website, and informing all consultees of the publication.

The publication of this document fulfils Requirement 4.



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