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Energy & Environment



South Staffs Water

Strategic Environmental Assessment: Post Adoption Statement

South Staffordshire Water
Water Resources Management Plan 2019

Report for South Staffordshire Water Plc

Customer:

South Staffordshire Water

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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 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 each Water Resource Zone (WRZ) and for their supply area as whole (the WRMP).

The South Staffs Water's draft WRMP was published for public consultation in March 2018, accompanied by an Environmental Report to document the Strategic Environmental Assessment (SEA) of the draft WRMP. Following comments on the draft WRMP 2019 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 in August 2018.

In developing its WRMP19, 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).

The Final WRMP was published in December 2019 following receipt of approval from the Secretary of State in November 2019. The Environmental Report was also updated to align with the Final WRMP. 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 Directive¹, as transposed in England by the SEA Regulations². 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 WRMP19 consultation programme commenced in 2016 and included a wide range of stakeholders and the regulators. The SEA process for South Staffs Water's WRMP started early in 2017 and ran in parallel with the development of the WRMP. An Environmental Report was produced with the draft WRMP.

The assessment stage of the SEA process was repeated for each revision of the WRMP up to and including the Final WRMP19 to ensure that the findings of the Environmental Report remained relevant to the plan. This is in accordance with the Government's SEA Guidance³ 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) assessment to ensure an integrated approach to environmental assessment of the WRMP19.

¹ Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment

² The Environmental Assessment of Plans and Programmes Regulations, 2004 (2001/42/EC)

1.3 Purpose of the SEA Statement

The SEA Statement must describe:

- 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 and WFD assessments, have been used to help inform the development of the WRMP19.

At the outset of developing the alternative options to be considered for the WRMP, 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 and social criteria including risk to Water Framework Directive (WFD) water body status and risk of likely significant effects on European designated conservation sites under the Habitats Regulations. This screening helped identify several options that would likely lead to unacceptable adverse effects on the environment or society; these options were therefore excluded from the 'unconstrained' list (resulting in the 'constrained' list). A 'Feasible List' of options was subsequently arrived at through further screening stages. Again, options found to have unacceptable adverse environmental effects were rejected from the 'constrained' list. The process is explained in Section 10 of the Final WRMP.

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. The programme appraisal process initially involved the generation of a 'least-cost' programme using a water resource planning cost optimisation model. Certain environmental and social effects were monetised and included in the option costs input to this model.

The SEA was used to review all the environmental and social effects of the schemes contained within the least-cost programme taking particular account of those environmental and social effects which had not already been monetised (and which had thereby been considered through the least cost optimisation modelling). This provided a check that the least-cost programme did not include schemes that might cause unacceptable or avoidable environmental and social effects.

South Staffs Water used the outputs from the least cost optimisation model along with the findings of the SEA option appraisal (as well as the HRA and WFD assessments), as well as other factors such as regulatory requirements, customer preferences, risk and reliability, to identify a short-list of reasonable alternative programmes. The findings of the SEA feasible option assessments were initially used (alongside the HRA and WFD assessments) to evaluate the environmental and social performance of these alternative programmes. To avoid double counting of effects, those effects identified in the SEA that had been monetised in the optimisation model (e.g. carbon) were not considered when reviewing the SEA findings to reach decisions on the short-listed programmes.

The likely scale of adverse and beneficial environmental and social effects for each option was considered, both on its own 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) was 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 and heritage features).

These assessments, together with the consultation responses to the draft WRMP19, helped to determine the appropriate programme for inclusion in the Final WRMP19 preferred programme.

The HRA concluded that the preferred programme of the Final WRMP19 is compliant with the Habitats Directive, with no likely significant effects (LSE) on European sites anticipated. The WFD assessment demonstrated compliance with WFD objectives and statutory requirements for the Final WRMP19 preferred programme.

3 How the Environmental Report Influenced the WRMP19

The Environmental Report and the WRMP19 were developed in parallel so that the SEA process could actively inform the development of the Final WRMP19. Table 3.1 identifies the main findings and outputs of the Environmental Report which informed the development of the draft WRMP19 and subsequently the Final WRMP19.

Table 3.1 Environmental Report Findings and Consideration in the WRMP19

Finding/Output	How Integrated into the WRMP19
Options and Programme Effects	
<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 European sites designated under the Habitats Directive.</p>	<p>High level screening assessment of the options in the 'unconstrained' list identified options with unacceptable adverse environmental effects which were rejected from the options "pool". This included groundwater options and an option relating to Chasewater Reservoir with identified environmental risks/concerns.</p> <p>A more detailed review of environmental and social assessment was applied to the 'constrained' list. Options found to have unacceptable adverse environmental effects were rejected. For example, an excluded option (1.1.2) to drill new boreholes in Stour Valley (Upgrade Prestwood) was screened out on the basis that it will have issues with Checkhill Bogs SSSI and Smestow Brook and potential major adverse construction-related impacts on the River Stour.</p>
<p>Individual option assessments were undertaken according to the SEA framework developed. 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 SEA confirmed that none of the options contained in the least-cost programme would result in significant effects.</p> <p>Consideration of the mostly negligible adverse effects and minor beneficial effects identified for demand management options influenced decisions to include a greater proportion of these options in the preferred programme.</p> <p>The programme appraisal identified alternative programmes that balanced other benefits such as customer preferences and improving resilience to climate change against cost for supply-side options. The SEA, WFD and HRA assessments indicated that the SHPW and SOPW option had relatively few adverse environmental effects compared to many of the other supply-side options. This assessment influenced the inclusion of the SHPW and SOPW option in the preferred programme - rather than the other options in the feasible list - in order to eliminate the remaining supply deficit that could not be achieved by demand management measures alone.</p>

Finding/Output	How Integrated into the WRMP19
Mitigation of the Final WRMP19 schemes	
Effects on water and biodiversity, flora and fauna: The SHPW and SOPW option could result in adverse effects due to the proximity of the proposed nitrate effluent main to two small areas of ancient woodland. Construction work would also present potential for temporary, medium to long term effects to non-designated habitats.	In addition to standard best practice mitigation measures, careful detailed design and any required habitat compensation to offset the residual impacts were identified.
Population and human health: The SHPW and SOPW option could result in short term severance of public rights of way and nearby places of interest such as Shropshire Union Canal.	In addition to provision of footpath diversions and reinstatement following construction completion, careful siting and use of screening where work locations are in proximity sensitive receptors was identified as being necessary for further development during implementation of this option.
Archaeology and cultural heritage: The SHPW and SOPW option poses a risk to unknown heritage assets from the excavation of pipeline routes and at other construction sites.	Further investigation and liaison with Historic England is required as well as appropriate mitigation measures such as amendment of pipeline routes and routing pipelines to follow existing roads wherever possible.
Air and Climate: The plan was identified as having potential adverse effects concerning air quality and carbon emissions.	Air quality effects may be mitigated through improved transport logistics, and routing to avoid sensitive areas such as AQMAs. Opportunities to generate energy from renewable sources, energy recovery and renewable energy options will be positively explored as part of the development of the detailed design of all options included in the plan.

4 Consultation on the SEA

4.1 Introduction

The SEA Regulations require consultation at the scoping stage and on the assessments as documented in 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 on 21st April 2017 to the Environment Agency, Natural England and Historic England as the WRMP19 options would not affect other nation states of the UK.

The Environmental Report was published and issued for consultation in March 2018. It provided a useful reference point for consultees to express their views on South Staffs Water's draft WRMP19. Comments relating to the Environmental Report and the SEA process and comments on the draft WRMP19 were responded to by South Staffs in its Statement of Response submitted to Defra in August 2018, and sent to all respondees to the consultation. A revised draft WRMP19 was published in August 2018 alongside the Statement of Response which reflected the responses. Updates to the SEA, HRA and WFD assessment were made to reflect these updates. Following further updates (taking account of customer and stakeholder preferences) and approval by the Secretary of State, the Final WRMP19 was published. An updated version of the Environmental Report was issued to accompany the Final WRMP19.

This SEA 'Post Adoption' Statement sets out how the SEA and any views expressed by the statutory consultation bodies or the public have influenced the Final WRMP19.

Table 4.1 lists the main documents relating to the WRMP19 environmental assessments and provides their publication dates.

Table 4.1 Summary of WRMP19, SEA, HRA and WFD Documentation

Document	Date	Purpose
SEA Scoping Report	April 2017	Issued to public and statutory bodies as vehicle for consultation on scope and approach for SEA
Draft Water Resources Management Plan 2019 (WRMP19)	March 2018	Issued for formal consultation to understand the views and priorities of customers and stakeholders
SEA Environmental Report for the draft WRMP19	March 2018	Issued with the Draft WRMP to document the environmental assessments supporting the Draft WRMP19.
HRA Report for Draft WRMP19	March 2018	Issued to fulfil Habitats Directive requirements for the draft WRMP19
WFD Compliance Assessment Report for Draft WRMP19	March 2018	Produced to fulfil WFD objectives and statutory requirements for the draft WRMP19
Statement of Response (SoR)	August 2018	Responded to the comments received from consultation on the Draft WRMP19, including those relating to SEA and HRA (referred to below)

Document	Date	Purpose
Revised draft Water Resources Management Plan 2019	August 2018	Amended to take account of the changes made as a result of the public consultation.
Secretary of State letter of approval for WRMP19	November 2019	Instruction to publish Final WRMP19 in accordance with Regulation 6 of the Water Resources Management Plan Regulation 2007
Final Water Resources Management Plan 2019 (Final WRMP19)	December 2019	Final WRMP19 published, incorporating the further information requested by Defra submitted on 5 July 2019
SEA Environmental Report for the Final WRMP19	December 2019	Produced with the Final WRMP19 to document the environmental assessments supporting the Final WRMP19
HRA Report for the Final WRMP19	December 2019	Produced to fulfil Habitats Directive requirements for the Final WRMP19
WFD Compliance Assessment Report for Final WRMP19	December 2019	Produced to fulfil WFD objectives and statutory requirements for the Final WRMP19
SEA Post Adoption Statement	December 2019	Sets out how the SEA and any views expressed by the consultation bodies or the public have influenced the Final WRMP19

4.2 Consultation on the Draft WRMP19

The responses to the consultation on the draft WRMP19 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/2231/statement-of-response-to-dwrmp19.pdf>.

The Environmental Report, HRA Report and WFD Compliance Assessment Report for the Final WRMP19 took account of the comments made by consultees and the Statement of Response.

5 Rationale for Selection of Options for the Final WRMP19

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 water resource planning cost optimisation model (explained in full in Section 10 of the Final WRMP19). Certain environmental and social effects were monetised and included in the option costs input to this model.

Programme appraisal is the process by which the least-cost Programme is refined to create the Preferred Programme. The process takes account of the environmental and social effects of each option identified by the SEA (as well as the HRA and WFD assessments), as well as other factors, such as regulatory requirements, customer preferences, risk and reliability. Only those environmental effects which have not been monetised are taken into account in the SEA appraisal of the least-cost programmes, in order to avoid double counting of effects.

Having reviewed the least-cost 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. In order to successfully demonstrate this, a series of scenarios were appraised within the model. These scenarios mainly focused on stress testing the demand savings or reliable water supply benefits of the options; however, South Staffs Water also looked to understand the certainty in deliverability of options and how delivery of reliable supplies to customers would be affected if some feasible options were excluded from the analysis. In addition to this, South Staffs Water optimised across a range of other objectives to understand how selecting, for example, a greater level of resilience, or a portfolio that better delivered on customer preferences, would change the base least-cost programme portfolio. South Staffs Water was able to generate a number of alternative programmes of options. These were then overlaid with the outputs of the company's specific WRMP19 customer engagement work to ensure that customer preferences around the supply and demand options were reflected within the preferred portfolio of options so as to demonstrate the plan had been co-created through customer engagement. The programme appraisal modelling outputs of each of these scenarios were then considered in the context of the distribution network to ensure that customer priorities were met in relation to key performance standards for continuous supplies and excellent water quality. Findings from the SEA (and associated HRA and WFD assessments) were used to consider the relative environmental performance of these different alternative programmes.

After reviewing the various alternative programmes from the scenario testing and their relative performance against a range of evaluation criteria, South Staffs Water decided to modify the least-cost programme and created a hybrid portfolio of options that it considered demonstrated a robust, flexible approach to ensuring the balance of supply and demand into the future. The preferred portfolio was shaped by what customers told the company was important to them. In essence, this promoted demand-side opportunities and balanced resilience benefits against cost for supply-side options.

The resulting preferred programme for the 25-year planning period of the Final WRMP19 includes the SHPW and SOPW option which has potential for adverse environmental and social effects during construction (e.g. construction works within an Air Quality Management Area and habitat loss during pipeline construction); however, none of the identified adverse effects are considered significant. The inclusion of this option in the preferred programme ensures other requirements, such as customer

preferences and improving resilience to climate change, are met to a greater extent than the least-cost programme.

6 Monitoring of the WRMP19

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 Final WRMP19 and the associated preferred programme, monitoring will track the residual environmental effects to show whether they arise as anticipated in the SEA appraisal, to help identify any adverse 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 are brought forward for development, further monitoring requirements may be set out in planning applications, or in South Staffs Water's voluntary best-practice monitoring plans accompanying scheme development. This will be discussed with relevant key regulatory bodies and stakeholders.

Key monitoring parameters at the strategic WRMP19 level will be those relating to the abstraction of water and the effects that this may have on waterbodies and their functions as habitats. There are also direct potential effects on humans, the built environment, terrestrial habitats, the atmosphere and heritage assets, which may arise from construction activities and/or option operation. These parameters should, therefore, be included within the monitoring programme where it is practicable to do so. Extensive primary data collection is neither feasible nor appropriate for this programme level of monitoring, and use should be made where possible of existing datasets and monitoring regimes, in line with SEA national guidance for WRMPs.

Site-specific monitoring requirements for the supply options included in the preferred plan (SOPW and SHPW option) will be developed in the detailed design that will accompany scheme development (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.

The monitoring plan will be owned and implemented by South Staffs Water and will be developed to reflect the temporal phasing of the WRMP19 delivery. The monitoring plan will be further developed beyond this SEA Statement during the implementation of the WRMP19 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).

Table 6.1 identifies key monitoring indicators, information source and ownership of the monitoring activity.

Table 6.1 Proposed SEA monitoring parameters – strategic WRMP19 monitoring

Impacted Receptor	Monitoring Indicator	Information Source	Responsibility
Water resources, water quality, biodiversity	Proportion of surface waters and groundwater waterbodies at 'Good' WFD status	Environment Agency online Catchment Data Explorer for RBMP2 for the year 2015 and any updates	Environment Agency
	Protected species and habitats surveys	Site specific during detailed design stage to confirm presence/likely absence of protected species	South Staffs Water
	Biological monitoring (macrophytes, macroinvertebrates, fish)	Environment Agency database, monitoring completed by South Staffs Water	Environment Agency, South Staffs Water
	Condition of European Sites and SSSIs according to Natural England condition assessments	Natural England favourable condition assessment tables	Natural England
	Progress against the South Staffs Water biodiversity targets	Biological monitoring and surveys	South Staffs Water
	Surface water and groundwater levels	Monitoring and comparison with historic records	South Staffs Water, Environment Agency
Climate Factors	Net greenhouse gas emissions per MI (million litres) of treated water (kg CO ₂ equivalent emissions per MI)	Reported annually by South Staffs Water	South Staffs Water
Transport	Transport fleet fuel consumption, emissions and mileage	Routinely monitored by South Staffs Water	South Staffs Water
Nuisance/ Community Amenity Effects	Scheme level community disruption due to construction works / during operation (where applicable)	Monitored through an Environmental Management Plan	South Staffs Water
	Complaints logged during construction	Compile data held by South Staff (and contractors) and Local Authority Environmental Health Officer	South Staffs Water, Local Authority

Impacted Receptor	Monitoring Indicator	Information Source	Responsibility
	Customer satisfaction surveys	Responses gauged through and reported in South Staffs Water's annual performance processes	South Staffs Water
	Surveys of recreational and other amenities likely to be affected	Survey responses pre- and post- construction	South Staffs Water
Air Quality	Scheme-specific monitoring during construction works / during operation (where applicable)	Environmental Management Plan	South Staffs Water
	Changes in background air quality	Defra Automatic Urban and Rural Network, Local Authority monitoring	Defra, Local Authority data sources
Resource Use	Proportion of demolition materials sent to land fill or recycled	Part of Construction Environmental Management Plan	South Staffs Water (and/or its contractors)
	Proportion of construction build materials derived from recycled materials	Part of design criteria for new builds	South Staffs Water
Landscape and visual amenity	Loss of land within AONB, National Park or protected views	Landscape and Visual Impact Assessments	Complete assessments in consultation with Natural England, Local Authority and Historic England
	Changes to townscape and views	Townscape assessment	As above
Cultural Heritage	Loss or change in condition of buried archaeology	Archaeological Written Scheme of Investigation	Complete assessment in consultation with Historic England and Local Authority
	Change in condition of existing heritage assets	Environmental Management Plan	South Staffs Water
		Monitoring of heritage assets such as Listed Buildings and Scheduled Monuments, Registered Battlefields, Registered Parks and Gardens, in particular the 'Heritage at risk' register.	Historic England

These monitoring indicators would form the core component 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 (adverse or beneficial). In turn, the monitoring may identify changes to the mitigation measures necessary to minimise adverse effects and/or modifications to scheme design or operation to further augment beneficial effects.

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.

As options set out in the Final WRMP19 are brought forward for development, further specific monitoring requirements may be incorporated in detailed designs and 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). These will be discussed with relevant regulatory and statutory bodies and stakeholders to agree the appropriate scale and duration of such scheme-specific monitoring activities proportionate to the assessed environmental risks.

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.

7 Availability of Documents

The adopted Final WRMP19 and accompanying final SEA Environmental Report is available on South Staffs website at:

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

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

- Email to: WRMP.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 WRMP19 or associated documentation, please use the email or postal address above.

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 WRMP19, to:

- Make a copy of the Final WRMP19 and SEA Environmental Report available at its principal office for inspection by the public at all reasonable times and free of charge;
- Notify the public and potentially affected parties of their availability;
- Inform the statutory consultees and other parties who responded;
- Issue a statement containing:
 - How environmental considerations have been integrated into the WRMP19;
 - 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 WRMP19 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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