

Statutory Pre-Consultees	Named Contact/Date Sent	Substance of Response	SST Action
Ofwat	Margaret Read 27.07.22	<ul style="list-style-type: none"> <li>You should present the outcome of WRWs problem characterisation to justify your choice of decision-making approach based on the WRW regional plan. You should demonstrate how the best value approach, adopted at a regional level from WRW, optimises across a broad range of metrics to achieve a robust best value plan and how this has subsequently informed your draft WRMP24.</li> </ul>	Completed during engagement sessions with Ofwat throughout 2022 and included in WRMP.
		<ul style="list-style-type: none"> <li>Our long term reference scenarios should be considered as part of the best value adaptive plan assessment, please refer to 1) Ofwat's final guidance on long-term delivery strategies at PR24 and 2) the clarification on the approach agreed at the Regional Coordination Group (RCG) with us and the Environment Agency around the common reference scenarios for abstraction reductions, which was recently communicated to company regulation directors and WRMP leads (WRPG section 10.8).</li> </ul>	Common reference scenarios used for testing the plan, as agreed between regional planning groups, Ofwat and EA. These include Ofwat compound high and Ofwat compound low scenarios
		<ul style="list-style-type: none"> <li>We are expecting companies to make significant effort on demand reduction. Companies should set out informed and efficient glide paths to meet company and policy targets. <ul style="list-style-type: none"> <li>You should include detail within your WRMP annual review 2021-22 and your draft WRMP24 of how recent actual data is informing and reducing uncertainty and strengthening confidence that these targets are deliverable. This should include improved understanding of demand following the Covid-19 pandemic. We encourage consideration going forward, through sensitivity analysis, of the combined impact of new hybrid ways of working and dry weather not experienced in recent actual data and the impact this may have on the dry year uplift (WRPG section 6.1).</li> <li>You should fully consider our PR24 draft methodology requirements on leakage and meeting the 50% reduction target by 2050. We have a minimum expectation for all companies to plan to meet the 50% reduction in leakage by 2050 on an individual basis. This is consistent with both long-term government targets and the commitment made by English companies. This expectation and the exceptional circumstances where companies can propose leakage targets less than the 50% reduction are discussed in further detail within our PR24 draft methodology. We expect you to take account of the expectations set out in our PR24 draft methodology in developing your draft WRMP24. [Ofwat, 'Creating tomorrow, together: consulting on our methodology for PR24</li> </ul> </li> </ul>	Our South Staffs preferred plan includes the public interest commitments of 50% leakage reduction by 2050 and 110 l/h/d PCC by 2050. In addition, we also include 9% NHH consumption reduction by 2037, in line with the proposed Environment Act targets. As a result, there are no supply options required in the South Staffs region. Our WRMP also shows how this is supported by our extensive customer research programme, and our methodology for testing the choices with our customers.

		Appendix 9 - Setting expenditure allowances', Section 5.2.3 Long-term water demand targets] o You should clearly present in your plan the difference in cost, benefit and environmental impact between achieving differing levels of leakage reduction by 2050 and other supply side solutions to robustly test these choices with customers.	
		<ul style="list-style-type: none"> <li>We request that you check and confirm in combination assessments including for environment and deployable output at the programme level as part of best value plan assessment (WRPG section 10).</li> </ul>	N/A for South Staffs as no supply options required in plan
		<ul style="list-style-type: none"> <li>We are expecting to receive an updated and fully completed pre-consultation data table (provided alongside the pre-consultation briefing pack) once your decision-making process is complete and your preferred draft best value plan is available (WRPG section 3.4). These tables should be submitted to us in advance of and in addition to the WRMP data tables that you will submit alongside your draft WRMP. Early sight of proposed draft level of investment (£m for 2025-30 and beyond) in terms of base and enhancement expenditure prior to draft WRMP24 submission, and any potential related cost adjustment claims, is particularly important.</li> </ul>	Completed in January 2023
		<ul style="list-style-type: none"> <li>Costs presented at the final WRMP24 stage are expected to be the same as those submitted into business plans at PR24 (WRPG section 8.3.1). Given the short time between final WRMP submission and PR24 submission this should be achievable. If there could be significant changes in your plan post draft WRMP24 (in particular on the plan's costs, expected benefits and impact on the environment), you should consider how these will be managed within your overall consultation process and the timeline for submission of your business plan. (WRPG section 3.3).</li> </ul>	Our WRMP will be mandated into our PR24 submission, including costs. Whilst these costs may be subject to refinement between the draft WRMP and PR24 submissions, they will be aligned as far as possible.
		<ul style="list-style-type: none"> <li>You should fully and robustly show evidence and explain in the narrative any significant changes to your supply demand balance, especially regarding any decreases in deployable output. You should clearly show and explain how the benefit of funded schemes have been factored into your supply demand balance for WRMP24 (WRPG section 1.4.5 and section 3.3.3).</li> </ul>	Included in narrative
		<ul style="list-style-type: none"> <li>There is a need to ensure that abstraction reductions are not double counted when licence capping is combined with environmental destination scenarios and we request more detail on board assurance and engagement on near term risk of licence capping (WRPG section 5.4.1).</li> </ul>	In our plan, we have included the agreed licence caps for AMP8 in our environmental destination number, to ensure there is no double counting.

	<ul style="list-style-type: none"> <li>• WRMP schemes should have some benefit to or impact on one or more components of the supply demand balance. (WRPG sections 8.2 and 9.2). There has been no change in the joint regulator guidance on this point. All communication on this has been in line with the WRPG and supplementary guidance. We provide the following as clarifications in accordance with the guidance: <ul style="list-style-type: none"> <li>o Catchment and nature based solution (C&amp;NBS) options that have a WAFU benefit to supply-demand balance can be promoted via the WRMP and should feature in the WRMP data tables.</li> <li>o All schemes that are presented in WRMPs should include the full costs of delivery to deliver the presented WAFU benefits. The costs of delivering 10% biodiversity net gain (to gain planning permission where this is necessary) should be included in option costs prior to option appraisal. We note that biodiversity net gain may be delivered through the option itself at no additional cost, onsite provision or offsite as part of a wider C&amp;NBS. (WRPG section 4.1.1 and supplementary guidance 'Environment and society in decision-making (England)' section 2.3.2).</li> <li>o C&amp;NBS addressing another primary driver relating to company activity (e.g. improving water quality) should be presented in appropriate enhancement lines in business plan. These can be discussed within the narrative of the WRMP to provide evidence and justification of need.</li> </ul> </li> </ul>	Noted and incorporated
	<ul style="list-style-type: none"> <li>• Sub zonal schemes (not impacting on zonal WAFU) can be discussed within the narrative of the WRMP to provide evidence and justification of need but they need to be presented for funding with your business plan rather than your WRMP. Interconnection required to deliver full WAFU benefit of the option can be included as part of WRMP option level cost and benefit. (WRPG reference 8.3.1).</li> </ul>	No interconnectors required. Any sub zonal schemes will be included in PR24
	<ul style="list-style-type: none"> <li>• It is your responsibility to maintain and manage your assets to ensure they are available when needed and that they are available and fit for purpose both under normal and peak operating conditions if relied upon in a WRMP. This is in accordance with your duty under section 37 of the Water Industry Act 1991. Your baseline water resources planning scenarios should include the benefits of non-supply demand balance solutions such as capital maintenance (WRPG section 4.8).</li> </ul>	Included as directed
	<ul style="list-style-type: none"> <li>• We expect companies to develop and present as part of their draft WRMP a monitoring plan which allows tracking of progress against the best value adaptive plan. The monitoring plan should support ongoing review of supply demand balance forecasts and performance against key metrics and outcomes including option delivery. The</li> </ul>	No adaptive plan required for SST as detailed in the WRMP. However progress against the WRMP will be monitored

		monitoring plan should enable identification of triggers for when key decisions need to be made and action taken (WRPG Section 3.9, 6.4 and 10.3).	annually through the WRMP annual return process
		<ul style="list-style-type: none"> <li>You should present evidence in your plan that you have fully considered a range of options, including a large range of supply-side and demand-side options, range of option sizes and option lead in times. This will ensure that model inputs do not artificially skew programme selection and ensures that proposals are likely to be optimum over a range of operating conditions and future scenarios.</li> </ul>	All options included
		<ul style="list-style-type: none"> <li>Regarding solutions with expected low utilisation rates, in line with what we said in our expectations for strategic planning frameworks for PR24 (page 8)2 we expect full consideration of planned operational interventions, where these are appropriate, for example during low probability events. We would like evidence presented in your WRMP that planned operational interventions have been considered and will be implemented where appropriate if this is the best value solution. This will help to avoid developing unnecessary infrastructure which may have very low utilisation or not be required if the risks do not transpire. You should include in your WRMP24 narrative robust evidence fully explaining and justifying the utilisation rates given. You should include explanation and evidence you have fully tested utilisation rates and explored modularity and scalability in optioneering in managing low utilisation situations and future need uncertainty (WRPG section 4.7).</li> </ul>	N/A
		<ul style="list-style-type: none"> <li>You should present evidence in your plan that you have fully considered options with lower fixed costs and higher variable costs and if appropriate explored how revenues could be generated from multi-party use in low utilisation scenarios.</li> </ul>	Included
		<ul style="list-style-type: none"> <li>Reporting should be maintained in the 20-21 price base for draft and final WRMPs rather than moving to 21-22 or 22-23. At business plan stage, we will request that you clarify that any changes in costs between final WRMPs and Business Plan submissions are solely due to price base updates and to confirm your assumptions. This is also consistent with the WINEP guidance.</li> </ul>	Pricing included at 20/21 price base, specifically as Dec 2020.
		<ul style="list-style-type: none"> <li>Some companies have raised concern about stakeholder confusion regarding consultation and requested that regulators publish a simple guide to explain the need for parallel consultations. We understand that the Regional Coordination Group is working on two actions to address this. Firstly, a joint website across the regional groups and secondly a national summary document to be funded by the regions. This document is intended to also include a plain English description of the role of the various plans, the</li> </ul>	Completed

		consultations and how they fit. We recommend that you engage in this process to make sure it meets your needs.	
		<ul style="list-style-type: none"> <li>• Company plans need to be clear on how the regional plan and company level objectives, metrics and outcomes align / deviate with differences clearly explained.</li> </ul>	Included in WRMP
		<ul style="list-style-type: none"> <li>• Any programme delays at the regional level need to be appropriately managed at the company level to ensure a robust and timely delivery of a fully assured and compliant best value plan which reflects customer and stakeholder views.</li> </ul>	N/A
WRW	Unsigned letter 23.03.22	Going forwards we expect South Staffs to continue developing its WRMP by following the WRW methodologies. Particularly for the next stage of development, the selection of the preferred plan for consultation should be done in a way that aligns across WRW. The water company remains responsible for its duties under legislation, and its board is accountable for decisions that pertain to those duties. It is however a requirement of the National Framework that regional planning is reflected into WRMPs. Therefore the WRW methodologies set out how common evidence will be produced to inform those decisions, so that they will reflect regional needs. In doing this it is also important that the company works to produce evidence and take decisions following the common timetable agreed in the WRW programme plan. By continuing to work in this way we will be able to produce a consistent and coherent regional plan and ensure this is reflected into the South Staffs WRMP.	We can confirm we have continued to do this and that our WRMP is a direct reflection of the regional plan
		WRW's membership includes representatives of a range of other abstracting sectors. The WRW regional plan is therefore a multi-sector plan. Our methodologies set out how we are integrating public water supply (PWS) and non-PWS needs in the plan. Our Strategic Environmental Assessment and best-value decision support metrics provide evidence on how water company decisions may affect the quality and quantity of water available to other users. We expect that to be reflected into company decision making so that detriment to the non-PWS abstractors is avoided, and options that provide benefit are promoted instead. The water needs of other sectors are vital for the UK's energy security and food production, for many sectors of the economy, for the environment and for the wellbeing of communities.	Incorporated into our process where applicable
		WRW has identified priority non-PWS catchments and is undertaking engagement in those catchments. One of those catchments is in South Staffs area and includes South Staffs abstractions: the Staffordshire Trent Valley. We expect South Staffs to engage with us and the other abstractors in that catchment and work to identify joint actions or	The WMS is the priority catchment within the SST region – we have worked as part of this workstream and have incorporated actions into

		options which could benefit both South Staffs and the other abstractors in the catchment.	our WINEP programme for AMP8, as detailed in the WRMP
		<p>Of particular importance is the second reconciliation. This second reconciliation is the means by which the strategic (i.e. large or inter-regional) schemes should be selected consistently in our draft plans, i.e. the same dates and volumes are proposed in the regional plan and the WRMP. This is particularly important because draft regional plans must<sup>1</sup> be reflected into the water companies draft WRMPs and the WRMPs should have an assurance statement from the company board that the plan is a best value plan for managing and developing the company's water resources<sup>2</sup>. This means that we need to work together in reconciliation to develop evidence that any transfers involving South Staffs can be included in the WRMPs of our members and the members of other regions as part of best value plans that their boards can assure. The regulatory timetable for producing the draft plans is also relatively tight, with just a few months to produce the plans and have them assured. We therefore ask South Staffs to:</p> <ul style="list-style-type: none"> <li>• provide us with clear and timely information through the reconciliation, in accordance with what has been agreed between the regions</li> <li>• take appropriate evidence based decisions through the reconciliation process</li> <li>• include a clear articulation of timing, volumes and utilisation of transfers in your draft WRMP, consistent with the outcome of the second reconciliation.</li> </ul>	Completed
		Water Resources West has received lots of feedback on its emerging plan. Regulators, councils, trade bodies, environmental and community groups, businesses and individuals have responded. This provides a rich set of information and views about how we meet future water resources needs. As a core member of WRW, this feedback has been shared with South Staffs. We expect South Staffs to take this feedback into account as it develops its draft WRMP and contribution to the regional plan.	Completed and feedback provided. WRW has since provided these detailed responses to stakeholders. SST specific comments are also detailed below.
EA	Mike Stokes 10.03.22	<b>Supply demand balance and drought resilience</b> We note that you are not reporting a supply demand deficit until very late in the planning horizon, however this is dependent on your choice of environmental destination scenario. As a water company under "serious water stress," we expect your draft WRMP to include a strong focus on customer demand management, metering (for example, consulting your customers about universal metering) and leakage reduction to help address these deficits. You will need to demonstrate you are making best use of your existing abstractions and assets before seeking to take additional water from the environment by way of supply options.	Our plan solely focuses on demand management and requires no supply options as such to manage the deficits.

		Where you do propose supply-side options in the draft WRMP, we expect you to do so in an open and transparent way so that we and other interested parties can clearly understand how your options would work.	
		<b>Sustainable abstraction and environmental destination</b> We expect your plan to account for the short-term regulatory requirements, as set out in the Water Resources Planning Guidelines, across your operating area. This should include measures to avoid WFD deterioration, ensure targets for Protected Areas are met, deliver actions to meet the Abstraction Plan for 2027 and actions required to achieve WFD regulations objectives as defined in River Basin Management Plans. We expect you to consider our emerging Water Industry National Environment Programme (WINEP) for PR24 for your company. We are concerned that you are not currently planning to achieve minimum regulatory commitments by 2050. You should work with us at a local level to generate a central scenario that builds on achievement of our National Framework for Water Resources Business As Usual scenario licence changes plus any additional licence changes required to meet Protected Area objectives. This central scenario should then underpin the Autumn 2022 draft plan. Your WRMP should clearly demonstrate your commitment to protect and improve the environment.	We have included our agreed licence caps for AMP8 in the WRMP tables and into our SDB calculations. In addition, we have included BAU+ scenario in the planning tables for our environmental destination approach.
		<b>Blithfield Reservoir and drought plan links</b> We note that you had some difficulties refilling Blithfield Reservoir following the dry Summer and Autumn in 2018. You should present information on this in both your drought plan and WRMP, being clear on the lessons you've learnt and how you've changed your operations to ensure you are resilient to a similar dry weather event in the future. Your drought plan and WRMP should align. In your WRMP you should show how you will over time move away from the need for drought orders that may affect protected sites (such as your River Severn Works drought order).	Our drought plan and WRMP align, and there is further detail on the 2018 dry weather impacts in our drought plan. This has now been reviewed and approved by the EA, and published on 5 <sup>th</sup> September 2022.
		<b>Focus on data quality</b> We have pointed out some data quality issues for the information you've fed into the Water Resources West reconciliation and emerging draft plan data tables recently. We look to you to ensure you have effective internal assurance processes in place so that you submit good quality data and information to us in your WRMP.	We now have 3 line assurance to mitigate this issue. Where appropriate, consultants fill in relevant tables, with review by Head of Water Strategy. Jacobs will then be providing 3 <sup>rd</sup> line assurance.
		<b>Adaptive planning approach</b> You should consider how the move to an adaptive planning approach affects your WRMP target headroom choices.	N/A for SST

		<b>Wider issues to consider</b> Government and regulators expect water companies to follow the water company water resources planning guideline when preparing their draft WRMP. Our latest revised guideline was released in December 2021 and has been jointly produced by the Environment Agency, Natural Resources Wales, the Welsh Government, Defra and Ofwat. If there are aspects of our guideline that you believe it will be difficult for South Staffordshire Water to follow then we'd welcome early dialogue on this.	We can confirm we have followed the WRPG. We also have Jacobs providing assurance on this, and then Board assurance also.
		To support our guideline, we have also produced a set of supplementary documents and templates that provide further information on specific topics. These include the supply-demand tables to be used for capturing and presenting water resources planning data to support your WRMP. These are all available from Sharepoint or upon request.	Noted
		Defra will be releasing 'guiding principles' which sets out advice for water companies in England. Government expects you to take account of the advice set out in this document when developing your WRMP.	These have been considered as part of the WRMP development
		Your WRMP should reflect the Water Resources West regional plan unless you can provide clear justification for not doing so. Some of the points we made as feedback to the recent Water Resources West emerging draft plan consultation are directly relevant to your WRMP – we'd welcome further discussions about how you are building our regional planning feedback into your WRMP.	We can confirm that our plan directly reflects the WRW regional plan. Further discussions were held during additional stakeholder sessions with the EA in 2022.
		<b>Customer and third party involvement</b> We encourage you to consult with a range of statutory and non-statutory stakeholders at this WRMP pre-consultation stage, including your customers, neighbouring water companies, environmental NGOs, Wildlife Trusts, local community and catchment groups.	We have undertaken a comprehensive customer and stakeholder engagement programme, as detailed in the WRMP narrative
CCWater	Christina Blackwell 28.02.22	Slide 2 of the South Staffs WRMP24 pack puts into context the National Framework and explains that the company is part of Water Resources West (WRW) regional water resource planning. We welcome this detail, however, we feel this regional focus is not reflected in the chart on slide 3 that informs how a WRMP is developed. It is important that the strategic supply and demand management options arising from WRW and how they impact the options appraisal at a company level are clearly shown. We want to see this detail set out in the draft WRMP24, when the WRW emerging plan should be more certain.	We have ensured that our plan clearly demonstrates the relationship between the WRMP and the regional plan.



		<p>We find slide 4 of the South Staffs pack confusing. The text refers to there being ‘no supply challenges until 2070 at the earliest’ and then states ‘This does not factor in the changes we will need to make as part of the National Framework Environmental Destination’. In addition, the schematic of forecast demand (including with management options applied) and available supply timeline ends at 2049. It is imperative that there is absolute clarity on the forecasted demand, demand with management options and available supply beyond 2050, up to at least 2070 in the draft WRMP24.</p>	<p>This is clearly defined now in both the WRMP narrative and the data tables.</p>
		<p>Given the above, it is imperative that customers and stakeholders are informed of, and involved in, the decision making process. We expect all the companies to test the affordability and acceptability of their WRMPs with customers. We commend you for the customer and stakeholder engagement carried out to date, and we welcome the steps taken to involve CCW and the Customer Panel in that engagement. However, given key decisions will be made by WRE and WRW, we are concerned about how customers’ and stakeholders’ views influence those decisions. In your draft WRMP24 we want to see evidence of a clear line of sight between the outcomes of customer and stakeholder engagement and the options and decisions of both regional and company plans.</p>	<p>We have undertaken a comprehensive customer and stakeholder engagement programme, as detailed in the WRMP narrative. We have also engaged Jacobs to undertaken assurance on the line of sight between the outcomes of customer engagement and the plan developed.</p>
		<p>At present it is unclear whether there will be longer-term impacts of COVID-19 and how the changes of blended working arrangements, with many people spending more time 3 working from home, will impact available water demand. We acknowledge that more work is needed to understand what the longer term effects of the pandemic are likely to be and we would like to see more detail set out in the draft WRMP24.</p>	<p>Noted</p>
		<p>Through our liaison with the company we have an understanding of many of the demand management options being considered. However, we are less clear on the special tariff to encourage water efficiency and the metering plans. We want to see more detail on these and discuss them with the company in the near future.</p>	<p>There is additional detail on this proposal in our WRMP, and will continue to discuss this option with CCW as we progress towards PR24</p>
		<p>We welcome the commitment to reduce leakage in line with the public interest commitment. It is clear from the output of your recent customer research that customers of both South Staffs and Cambridge Water see this as being a high priority in supply/demand options.</p>	<p>Noted</p>

		We welcome the approach to developing a best value plan, and the aim to develop multiple economic and social economic benefits. We look forward to seeing further detail on this in the draft WRMP24.	We can confirm there is further detail on this in the draft WRMP.
		Finally, we expect your WRMP24 to be in plain English and be user-friendly with the use of good infographics. Customers will respond better to clear, accessible documents, especially if they are shorter. Therefore, we would also like to see a customer focused shorter version of the main report.	We intend to produce a customer focused version of the main report and will work to produce this between the submission of the WRMP to regulators on 3 <sup>rd</sup> October and the publication of the documents for public consultation.
EA (Response to WRW's draft Regional Plan)	28.02.22	We have significant concerns with the decision made by Severn Trent Water and South Staffs Water to include no allowance for future environmental destination licence changes in the central planning scenario.	Environmental destination is included in our draft WRMP as the BAU+ scenario
		Page 16 SSW/Table 6. South Staffs Water Environmental Destination summary approach <i>'We will continue to work with the EA on any AMP8 WINEP investigations that are required, whose outcomes will then be implemented in AMP9 (by 2035)'</i> . Some may need to be implemented in AMP8 - this statement seems to skip an AMP? Or does this refer to the longer-term environmental ambition? SSW water doesn't seem to have included the longer-term environmental ambition requirements in its figures.	We have already agreed to the licence caps required in AMP8 as part of the no deterioration driver. This element refers to the additional environmental destination work required.
		<i>'South Staffs included the unconfirmed sustainability reductions for its WFD no deterioration investigations of groundwater sources. The values represented are the full range of proposed reductions based on recent actuals – however the caveat is that these are currently under investigation with the expectation that not all of the proposed reductions will be required'</i> . Again, we haven't seen any of this information and need to understand what is being included.	These sustainability reductions have now been confirmed and shared with the local and national EA teams.
		1.1.1 New BH at Kinver to make use of peak capacity.  1.1.3a and 3b – New BH at Hinksford & relining of existing BH, enhance output. "Spare peak daily capacity of approx. 43Ml/d on Stour Valley Group licence"  Both pumping stations lie within the Worcestershire Middle Severn Permo-Triassic Sandstone GW Body. This GWB is classed as poor (high confidence) and a is due to WFD	As a result of this feedback, we have removed this option from our feasible list due to the lack of groundwater available. It is now part of our unconstrained options only.

		<p>groundwater balance, Dependent SW test and Groundwater Dependent Terrestrial Ecosystem (GWDTE) test failures resulting from large scale groundwater abstraction for public water supply. The GWDTE test failure also gives rise to the classification of serious damage. The sites also fall within 'Water Not Available' Groundwater Management Units. This is manifested 'on the ground' as an aquifer heavily impacted by abstraction with associated impacts on supported SW/wetlands.</p> <p>The proposals appear to focus around increasing peak daily capacity and also reference increases to DO (new boreholes). On this basis it is not clear how the proposals will fit with the WFD no deterioration requirements. In the option descriptions/ assessments tab there is no reference to maintaining recent actual abstraction rates or agreed no deterioration baseline figures. It therefore appears as though the proposals could result in a long-term increase in consumptive RA abstraction. An increase in long term RA will therefore inevitably have an additional impact on groundwater balance, baseflows and potentially wetland habitats.</p> <p>In the first instance we need to establish whether we have correctly interpreted the SSW proposals. But we also need SSW to demonstrate that the proposals sit within the context of the no deterioration RA 'assessment approach'. This will also require scrutiny of the complex group aggregates in the case of the 18/54/6/140 licence under which both sites sit.</p>	
		<p>1.1.10 – Sandhills BH for potable supply:  Acknowledgement of no increase in RA and no det of GW balance and SW tests. The option notes that the borehole is located within a GWMU that has the status of “no water available” as the GWMU is “over abstracted” and over licensed and also notes that there “should be no increase over recent actual baseline and the sustainability of any localised increase in abstraction and WFD deterioration of GW Balance Test and Dependent SW Test would have to be considered”. We are pleased that SSW has built these considerations in to its planning.</p> <p>It is worth taking this opportunity to clarify the terminology used within the option; whilst the option notes that there should be “no increase over recent actual baseline”, however, for WFD purposes this should reference that any increase will be assessed against the agreed “15 year no deterioration baseline”. Both “15 year no deterioration</p>	<p>As a result of this feedback, we have removed this option from our feasible list due to the lack of groundwater available. It is now part of our unconstrained options only.</p>

		baseline” and “Recent Actual abstraction” is defined in the Measures Specification Forms that we have agreed with SSW.	
		<p>1.1.7 – 2 new BHs at Shenstone for treatment at Pipe Hill; Acknowledgement of no increase in RA and no det of GW balance and SW tests.</p> <p>Acknowledgement of no increase in RA and no det of GW balance and SW tests. The option notes that the borehole is located within a GWMU that has the status of “no water available” as the GWMU is “over abstracted” and over licensed and also notes that there “should be no increase over recent actual baseline and the sustainability of any localised increase in abstraction and WFD deterioration of GW Balance Test and Dependent SW Test would have to be considered”. We are pleased that SSW has built these considerations in to its planning.</p> <p>It is worth taking this opportunity to clarify the terminology used within the option; whilst the option notes that there should be “no increase over recent actual baseline”, however, for WFD purposes this should reference that any increase will be assessed against the agreed “15 year no deterioration baseline”. Both “15 year no deterioration baseline” and “Recent Actual abstraction” is defined in the Measures Specification Forms that we have agreed with SSW.</p>	As a result of this feedback, we have removed this option from our feasible list due to the lack of groundwater available. It is now part of our unconstrained options only.
		<p>1.1.9 – New BH Warton Unit: The Warton Groundwater Management Unit is now Restricted Water Available (RWA). This Unit is assigned RWA status in the Abstraction Licensing Strategy (ALS) as this GWMU is in a larger Groundwater Body (GWB) that is at Good Status but is at Risk of Deterioration due to licensed headroom. No new consumptive licences will be granted as this would increase the risk of deterioration in the Groundwater Body. It will be appropriate to take action to reduce fully licensed risks. Licence trades will be considered with licence holders located within Groundwater Management Units with the status ‘Water Not Available for Licensing’ to improve overall sustainability. Trades will only be considered if the applicant can clearly demonstrate that the new abstraction will not compromise GWB objectives or result in deterioration. The updated ALS will be published imminently. However, we have been working to the updated groundwater availability status’ since August 2019.</p>	As a result of this feedback, we have removed this option from our feasible list due to the lack of groundwater available. It is now part of our unconstrained options only.
		<p>1.4.5 – New BH Coven Unit; This Groundwater Management Unit has the status of Restricted water available (RWA) for licensing. This GWMU is in a larger GWB that is at poor quantitative status and is at risk of deterioration due to licensed headroom. No new consumptive licences will be granted as this would increase the risk of deterioration in the groundwater body. Opportunities to reduce fully licensed risks will be taken.</p>	As a result of this feedback, we have removed this option from our feasible list due to the lack of groundwater

		<p>The updated Staffordshire Trent Valley Abstraction Licensing Strategy was released on the Gov.uk website on 21 July 2021. However, we have been working to the updated groundwater availability status' since August 2019.</p>	<p>available. It is now part of our unconstrained options only.</p>
<p>EA's SEA Observations</p>		<p>References to options 2.1.1.1 and 7.1.2.1:</p> <ol style="list-style-type: none"> <li>1. The SEA results are presented in two tables. One uses symbols (+/- /0/?) as an indicator of the significance of the effect. The scale appears to be '---' to '+++'. The second table is entitled "Metric scores" and gives a score for the impacts. Some additional explanation of the second table would be useful to confirm my assumptions: <ul style="list-style-type: none"> <li>• The metric scores seem to be on a range of 1-12, but I could only determine this by seeking an option for which a '+++ effect had been assessed</li> <li>• A low score appears to correspond with a negative effect and high score with a positive effect.</li> </ul> <p>Where effects are identified, boxes below the assessment table provide a brief explanation of the type of effect and the rationale for the assessment.</p> </li> <li>2. The rationale for the correlation between the table showing symbols and the metric scores is not entirely clear. Presumably the '?' symbol is used to indicate where there is uncertainty. However, when this is translated across to the metric, this appears to be used to reduce the significance of an effect. For example, the negative effect on cultural heritage (-) is translated as a score of 4. Whereas the negative/uncertain impact on greenhouse gas emissions (-/?) is translated as a score of 5. The rationale for reducing the significance of the effect because there is uncertainty associated with it isn't at all clear and doesn't appear to be appropriate, given uncertainty could work both positively and negatively.</li> <li>3. An additional box below the assessment tables provides a brief explanation of the assessment categories: <ul style="list-style-type: none"> <li>• Biodiversity has been very narrowly defined as only relating to designated sites. This does not align with the text provided on the "SEA Thresholds" tab. This is likely to lead to an underestimate of the impact of the options on biodiversity. It might be more appropriate, where the natural environment is to be affected, to assume a negative impact and then consider this to be of higher significance if affecting designated sites.</li> </ul> </li> </ol>	<p>These queries have been resolved directly between Ricardo, who undertook the SEAs on behalf of SST, and the EA</p>

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|  |  | <ul style="list-style-type: none"><li>• It isn't clear what Sustainable Natural Resources covers. Reference is made to a Natural Capital/Environmental Resilience Assessment, but no further details are provided. Natural Capital isn't a standalone theme and cuts across several of the other criteria (eg biodiversity, soil, water, air) and it isn't clear how these overlaps are taken into account.</li><li>• Consideration of soils requires further clarification. Does this account for impacts on the condition and quantity of other sensitive soils such as peat?</li><li>• Flood risk only seems to consider whether the proposed asset is in a flood risk zone. This could be widened to consider whether the asset might be a source of flood risk (eg reservoir or pipeline).</li></ul> <p>4. The assessment of the impact on water quality and quantity refer to "WFD unavailable". It isn't clear what this is referring to.</p> |  |
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