South Staffs Water














South Staffs Water

Water Resources Management Plan 2024

Annual Review 2024/25

Securing your water future

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1. Executive summary

1.1 Purpose

This document sets out South Staffs Water's water resources management plan (WRMP) annual review for WRMP24 up to the end of March 2025. While South Staffordshire Water PLC incorporates the Cambridge Water supply area, this document applies only to the South Staffs Water region.

The purpose of the annual review is to identify any material changes to the WRMP and to report on progress made during the previous 12 months. Whilst for some of this period the previous plan WRMP19 was in effect, this report comments on outturn data against WRMP24. **We are not reporting any material changes to our latest WRMP published in August 2024.**

1.2 Overview

Although 2024 was overall the fourth warmest on record, the summer of 2024 was mild, with a peak day demand of 376.0 Ml/d occurring on 20th May. This was lower than previous years which have seen a peak day of more than 450 Ml/d. Average Day Peak Week was 347.9 Ml/d and occurred at the end of June.

The winter of 2024/25 did see a freeze/thaw event between 12th and 15th January 2025 seeing a period of increased demand due to increased leakage, of around 20-25 Ml/d above expected over 3-4 days.

The mild summer and winter of 2024/25 resulted in an average day demand of 319.7 Ml/d which is similar to the average day for 2023/24.

The first part of 2024 saw above average rainfall, however early 2025 was relatively dry, overall rainfall was 89% of average. Recharge and inflows were overall good and groundwater levels and reservoir levels remained healthy into 2025.

Other key points include the following:

Leakage

We have out turned 2024/25 with a leakage level of 58.4 million litres a day (Ml/d) (Post MLE). This compares to a WRMP24 2024/25 forecast position of 61.5 Ml/d.

Water Efficiency

The volume of water that each of our household customers uses – the 'per capita consumption' (PCC) – was an average of 140.3 litres/head/day (l/h/d). The dry year annual average WRMP24 forecast average PCC is 138.4 l/h/d.

Metering

We have installed 7,955 new meters including optants, new connections and replacements.

Temporary or non-essential use bans

We have maintained our current levels of service. There have been no temporary or non-essential use bans during the annual review period.

2. Introduction

We published the latest WRMP for our South Staffs region in August 2024; this plan came into effect from 1 April 2025 for the period to 2050. Whilst our WRMP19 was in effect up until publication of WRMP24 we have used the WRMP24 2024/25 forecast and assumptions to compare outturn data, as stated in the guidance. The 2025 annual performance report (APR25) data covering the period 1 April 2024 to 31 March 2025 has been used to inform this review. The data used in APR25 has been through our assurance process.

This review is a statutory requirement of the Water Industry Act 1991 (as amended by the Water Act 2003), which states that:

Before each anniversary of the date when its plan was last published, the water undertaker shall –

(a) Review its plan; and

(b) Send a statement of the conclusions of its review to the Secretary of State.

The purpose of the annual review is to identify any material changes to the WRMP and to report on progress. We have carried out this review in accordance with the Environment Agency's latest guidance, which advises that we should:

- report on the progress against our WRMP;
- highlight any changes made to our WRMP;
- describe progress with key components of our WRMP;
- explain any changes to planned deliverables;
- describe any changes due to exceptional events;
- report on the actions the Defra, Ofwat and EA, asked us to work on after we published our final WRMP; and
- report an overall summary of the supply-demand situation.

2.1 Water resource zones, level of service and performance commitments

Item	Description	Company comment on review
Water resource zones	Any changes to boundaries or number of zones?	There have been no changes to the South Staffs region water resources zone boundary, which remains a single water resource zone for the region.
Planned levels of service	Any changes to the level of service?	There is no change to our customer level of service stated in WRMP24. We consulted extensively with our customers as we prepared our business plan for 2020 to 2025, and they did not support a change to our levels of service, which are: • temporary use bans – not more than one in every 40 years; • non-essential use bans – not more than once every 80 years; and • emergency drought orders – not more than once in 200 years.
Performance commitments (PCs)	Progress on PCs that affect WRMP24	The Performance Commitments (PCs) relevant to WRMP24 are: • leakage. • PCC. • unplanned outage; and • our environmental programme (WINEP) obligations. We describe each of these topics in the chapters below on supply and demand. Other PCs and Performance Commitment Deliverables (PCDs) such as drought resilience, supply side options delivery also relate to WRMPs.

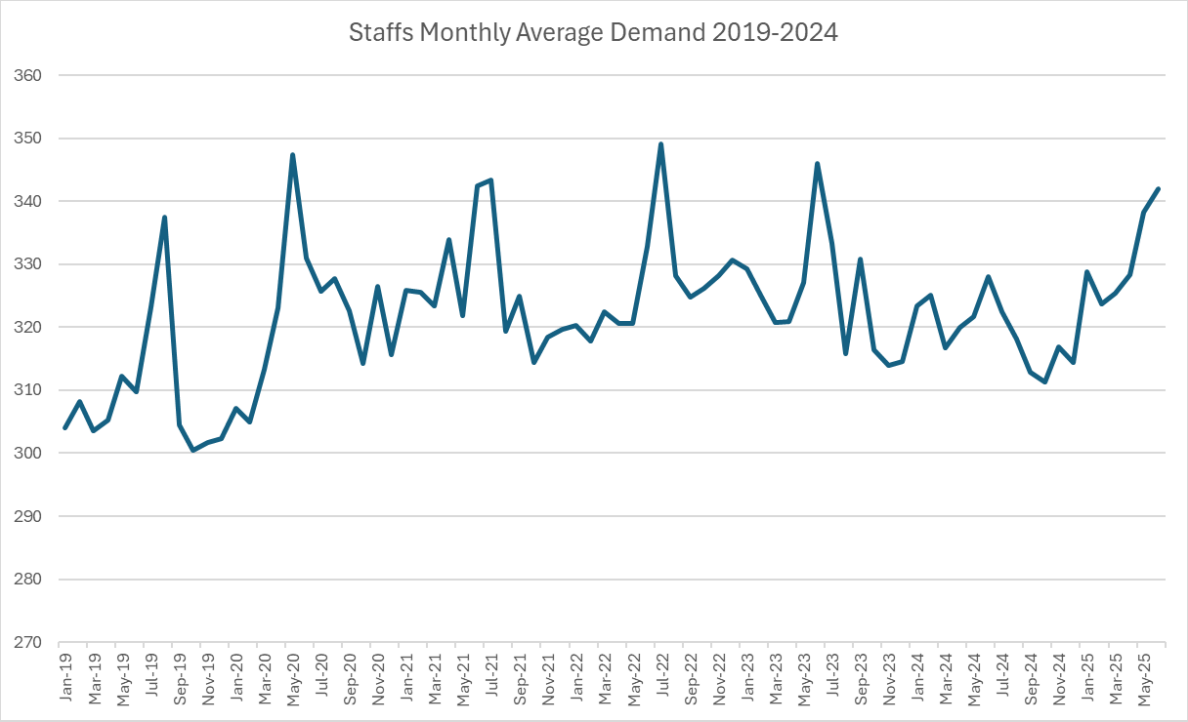
2.2 Overview of 2024/25 supply-demand balance

The reporting year saw an unremarkable summer without extreme weather-related events influencing supply and demand. April and May of 2024 were wetter than average, as was January 2025, with February and March 2025 drier than average.

A winter freeze/thaw event was seen between 12th and 15th January 2025 seeing a period of increased demand due to increased leakage, of around 20-25 Ml/d above expected demand over 3-4 days.

Overall, it was a normal year in supply demand terms.

Figure 1 Monthly DI profiles APR20 – APR25



The report year 2024/25 did not see the same high summer monthly average demands as in previous years – our highest average monthly demand remains that seen in 2022/23.

Overall, for 2024/25 average Distribution Input was 319.7Ml/d, compared to the dry year annual average (DYAA) forecast in WRMP24 of 319.3Ml/d. The outturn supply demand balance was 29.9 Ml/d, compared to 12.9 Ml/d forecast in WRMP24. The previous year supply demand balance was -13.2Ml/d, this step change is driven by the change to how outage is represented in the AR tables, as well as reductions in outages overall.

The security of supply for our customers was not at risk during the report year and we did not restrict customers' use.

2.3 Company-specific actions

In October 2024, we received a Joint Regulator Letter from the EA, Ofwat and Defra raising concerns around several areas in our WRMP19 Annual Review for 2023/24. We have made a formal response to all the issues raised, accompanied with a detailed action plan to resolve them. The main points are detailed below with summary updates provided; further details are in our response to the Joint Regulator Letter.

Supply Demand balance

We have transitioned from several years with a negative SDB to a positive SDB in 2024/25. As per our previous responses, the negative SDB was being driven by the planned outage element of total outage, which we can proactively reduce as required in a dry year if required. We have also seen a sustained increase in household demand and PCC following Covid-19. Outage has reduced by over 12 Ml/d for 2024/25, and along with a change to the methodology in the AR tables for reporting outturn outage, we have been able to report a positive SDB.

Demand

We are still seeing elevated demands driven by an increase in household consumption post Covid. However, our efforts in this area have led to a continued improvement in DI with 2024/25 outturn at 319.7 Ml/d compared to the WRMP24 forecast of 319.3 Ml/d. Outturn household and non-household demands were below DYAA WRMP24 forecasts. We expect this to further improve with our AMP8 plans to reduce demand and increase metering penetration.

Leakage

Our latest reported leakage figure of 58.3 Ml/d is below the WRMP forecast of 61.5 Ml/d, indicating that we have caught up with leakage since the last annual review. This has been aided by improvements to logging of the network and expanding the DMA network, as well as increasing resources on metering and leakage find and fix.

The leakage values in our WRMP19 were not aligned to the latest leakage methodology. Due to changes to the methodology, and refinement of data following this, we have since back cast our leakage position and it is this value that we are targeted to deliver through our Ofwat Performance Commitment (PC). We have updated our WRMP24 to align with this current leakage target position as per the PC, and therefore our business plan at PR24 and WRMP24 are now totally aligned.

We have missed our Ofwat leakage PC target in 2024/25 due to the nature of Owat's three year rolling average targets and the impact of previous years leakage number. We will provide more detail on this, the reasons for it and our improvement activity below.

Metering

Our metering forecasts in WRMP19 were based on customer optants. We have not received the number of customer requests for a meter through AMP7 to meet the forecast penetration in WRMP19. Despite the cost-of-living pressures experienced by many households in recent years, we have seen that our customers are concerned about potentially receiving unexpected changes in bills from moving to a meter. Meter penetration is also impacted by new connections, which has also been significantly below expected levels as the development in the region has slowed. Therefore, our outturn of 43%

meter penetration is below the WRMP24 forecast of 46%. We intend to make up AMP7 metering shortfalls with our AMP8 universal metering programme.

Outage

We have updated the outage allowance in WRMP24 to be more representative of our available DO, asset base and performance, with efficiencies applied to represent our continued focus to reduce outage. Around half of our reported outage figure is planned outage, so unplanned outage in a DYAA would be below the forecast in WRMP24. We have given outage and reduced yield a strong focus to enable us to understand, track and resolve unplanned and planned outage.

PCC

A proportion of our customers now remain in the South Staffs area to work from home where previously they would have commuted out of the area to work. As we were continuing to see levels higher than our forecast at WRMP19, we have incorporated a new baseline position for WRMP24. As a result, our outturn PCC against remains above the 2024/25 forecast in WRMP24, however it would be below the rebased figure from 2025 in our future forecasts. As we have increased our water efficiency efforts year on year since Covid we have seen reductions in PCC, although a slight increase since last year due to an improvement in our data.

2.4 Dry year annual average

The AR25 outturn Annual Average distribution input of 319.4 Ml/d was 3.1 Ml/d above the DYAA of 316.3 Ml/d in WRMP24. Re-based demands from 2025 would place this outturn demand below the revised forecast by over 10 Ml/d in a dry year, more representative of our revised forecast going forward. The DYAA peaking factor applied to consumption in the AR was 4.7%, as per the WRMP24. This uplift has been applied in the dry year adjusted data table to all demand components.

For the supply components, the dry year uplifted table deployable output is stated as the 1:200 drought yield, adjusted for any additional dry year constraints, such as licence conditions. Raw water losses, treatment works losses and operational use is also uplifted as much of this is associated with surface water treatment works and would proportionately increase with demands. WRMP24 forecast figures are similar to outturn.

Outage is calculated as a reduction against the WRMP24 Base Year licences, which are 1:500 yields, and is included only in the DYAA adjusted data table. The outage figure has not been uplifted by the dry year factor, as in a dry year it would be reduced.

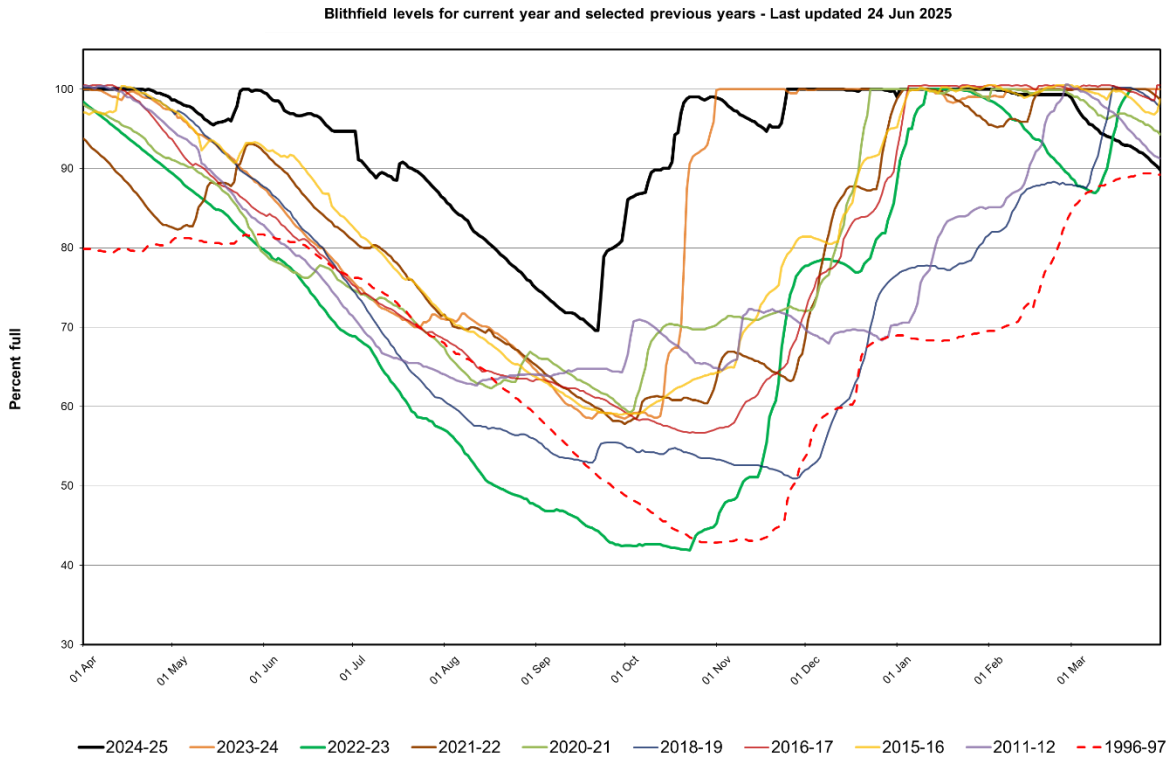
3. Supply

3.1 Impacts of weather events on supply

Total annual rainfall for the 2024/25 year at our Seedy Mill rain gauge was 614.8mm. This is 84.7% of the long-term average for the last 10 years. We monitor the rain gauge at Seedy Mill because of its proximity to our primary reservoir (Blithfield), which is where our drought triggers refer to. In addition, we refer to other sources of weather and hydrological information such as those found in the EA water situation reports.

The graph below shows the levels in Blithfield reservoir during 2024/25 and in other selected years.

Figure 2 Blithfield levels for the review period and selected previous years



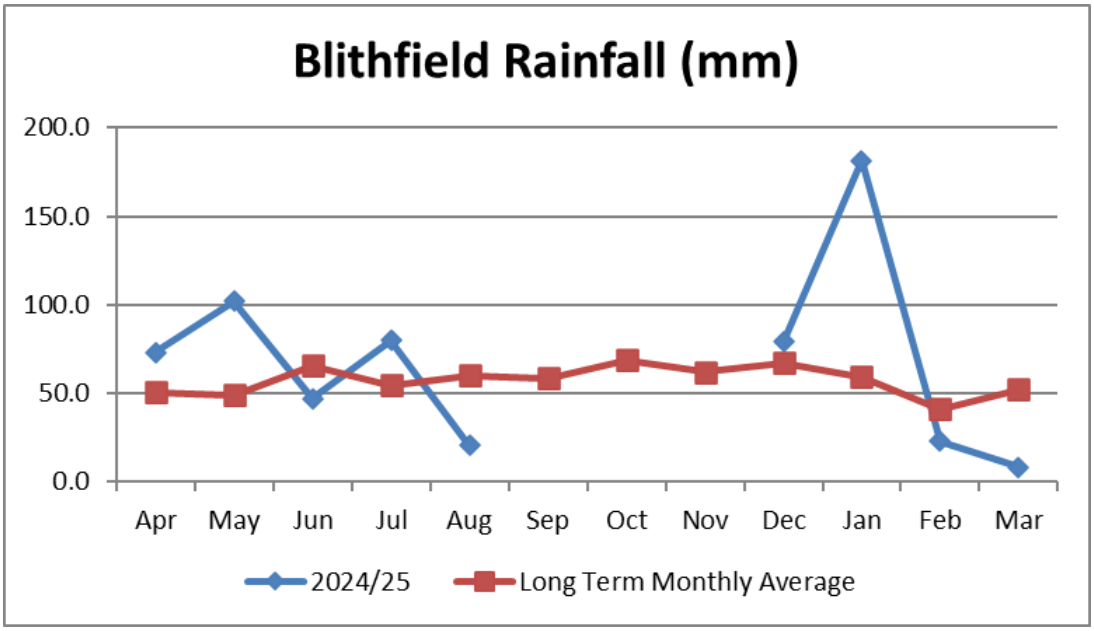
2024 saw a typical spring and a good summer in terms of Blithfield's storage position, with the summer level not declining below the previous 5 years. Learning from the events of 2022 and how Blithfield could rapidly drop in level, we utilised the Nethertown pumpback scheme, which pumps water back into the reservoir to help with recovery, as required.

The River Severn Regulation System limited the abstraction of Hampton Loade from 28th May to 9th September, with a total of only eight days of regulation, compared to 49 the previous year. This is less than the average number of regulation days for the last 5 years.

Through proactive work, we were both able to comply with Severn regulation and meet demand.

We commenced Blithfield conservation meetings at the end of April 2024, Blithfield's level had not gone below the reservoir's drought monitor curve (DMC). The level at Blithfield did not drop below the DMC this year.

Figure 3 Rainfall for Blithfield against long term average levels (1 April 2024 to 31 March 2025)



With a fairly average year our supply for the year was sufficient to meet both demand and target headroom. We did not need to apply for a drought permit and we did not restrict customers' use. A wet winter meant that we were at 100% storage across the winter and up until February 2025.

Groundwater storage and levels were not adversely impacted during the year.

3.1.1 Water Resources

Our raw water abstracted figure of 377.06 Ml/d aligns with our abstraction licence returns. (note: this includes the Chelmarsh Brook abstraction, which is often a minus figure due to compensation). We continue to monitor abstractions against licences closely with an abstraction planner by the Water Resources team to provide a guide for abstraction across the year to monitor our abstraction licences and efficiently balance our surface water and groundwater abstractions.

We continue to share our water resources situation with the EA by sending weekly situation reports on our strategic position and forecast changes that could affect our water supply and demand. This enables early sight of conservation measures, drought risk and the need for any drought measures.

3.2 Outage

Total outage for 2024/25 was 17.17 Ml/d, similar to the WRMP24 DYAA forecast of 17.0 Ml/d. A considerable amount of this, 9.1 Ml/d was for planned outage, which would not be authorised to go ahead if there were any supply issues, or likelihood of a DYAA demand situation. No adjustment was made for long term outages. We continue to balance the need for essential work on our assets to be carried out with the need to be able to provide resilient supplies.

Outage is calculated according to the UKWIR standard methodology and EA guidance. This includes both planned and unplanned outage and differs to the Ofwat methodology for calculating performance commitment outage as this excludes some types of outages. Therefore, they are not comparable.

The mode of failure for outages and duration within the period is summarised below. The greatest amount of outage is attributed to planned works, this is to ensure delivery of capital maintenance programme, and the main reason for total outage being close to the DYAA forecast. The number of days outage due to raw water quality did not lead to the full loss of deployable output at sources, these were operated at a reduced capacity.

Table 1 Outage breakdown

Outage category	Total Days
Power failures	10
Planned works	923
Treatment issues	16
Raw water quality	428
Pumping assets	115
Cleaning	79
Other	345

Our regular maintenance plan continues, and we have introduced an outage planner to reduce the risk of planned outage and maintenance work impacting on the supply demand balance. Our unplanned outage policy tracks outage using a traffic light system for escalation of outages in relation to extended period of downtime and impact on supply.

Green: water resources and demand are normal; unplanned outage to be responded to next working day.
Amber: water resources are below average or demand is above average; unplanned outage to be responded to same day.
Red: water resources are below average and we are below the drought monitoring curve; unplanned outage must be responded to within 2 hours.

3.3 Water Quality

We have now completed extensive improvement plans at both of our surface water treatment works – Hampton Loade and Seedy Mill. This work involves adding tertiary treatment to both sites. Seedy Mill was completed in 2022/23 and Hampton Loade Ceramic filters were completed in 2025. This project is now fully commissioned and complete.

The below details the current DWI notice we have:

Hampton Loade - Hampton Loade Water Treatment Works SST-2021-0001 - Disinfection by products, Taste and Odour, Customer acceptability and Clostridium perfringens.

Hampton Loade receives varying water quality based on its offtake from the River Severn. At certain times of the year, we see increases in Geosmin, and to manage this we reduce the flow through the works to remove the issue. During these instances, we balance the flows by increasing flows from Seedy Mill. Due to a relatively mild summer in 2043, this was managed as BAU without any concern. The upgraded treatment process will address this, and the other parameters listed in the notice.

Seedy Mill Water Treatment Works SST-2018-0003 - Disinfection and Customer Acceptability. The completed upgrade works meet the requirements of the notice and we continue to monitor customer acceptability.

Hampton Loade and Seedy Mill Distribution Network - SST-2018-0004 – Disinfection by products and Customer acceptability. This is a combination of the above points. The long-term plan works at these sites now completed will resolve these issues.

Kinver Water Treatment Works - SST-2018-0001 – Increasing trends and failure of blending regime (involving Cookley Pumping Station) to be able to maintain nitrate levels below PCV. To mitigate the increasing trends in nitrate concentration and risk of blend failure and customer impact we have relined both boreholes at Kinver WTW to a lower depth and lowered the pumping levels. At **Cookley WTW** we have also lined a borehole to a deeper depth.involves the relining of Borehole 3, to a depth of 90m (from the current depth of 30m). These works were completed in early 2025.

Slade Heath Pumping Station - SST-2019-0002 – Chlorthal and pesticide removal. Currently GAC is being used for removal. The permanent solution is to deliver an ION exchange

installation and continue catchment management. This programme is currently in the design phase, with a plan for completion in March 2026.

3.4 Water Industry National Environment Programme (WINEP)

The below details our progress against deliverables for 2024/25.

3.4.1 Sustainability Changes

In WRMP19, our approach to the sustainability reductions required in AMP7 was to sustainability reductions for AMP7 was to include the medium position (of three possible scenarios we identified) within our baseline assessment of DO, which is a reduction of 6 Ml/d. We have continued to work with the Environment Agency to better understand the risks and implement solutions, and an update on this is outlined below:

Bourne Brook
The augmentation scheme (augmenting flows during low flows in the Crane Brook) that was trialed and proposed in AMP6 was ultimately deemed as non-cost beneficial. The EA also agreed that the Canal and Rivers Trust should provide some form of augmentation which would be done through the new authorisations work currently ongoing. There is a holding line in the AMP8 WINEP to cover our involvement in this work until the CRT work is completed. We would look to vary the scheme to remove it in AMP9 once we know the impact of CRTs involvement in the catchment.

Licence changes derived from the No Det workstream has yielded outputs that will impose a 15 year average to licences in the group licence. This is equivalent to approximately 3.6 Ml/d reduction across the Lichfield licence group of sources. We are also planning in AMP8 to deploy a range of in channel and catchment improvements on the Darnford Brook with supplementary monitoring. This work in addition the licence changes that are already agreed should provide environmental benefits in the catchment.

Rising Brook
A licence change was completed in 2021 that re-apportioned volumes around the sources on the Slitting Mill/Moors Gorse/ Brindley Bank group licence but also resulted in an overall reduction in group licence volume of approximately 1Ml/d. It is anticipated that this licence configuration will be carried over upon renewal in 2025 and form the basis of the No Deterioration licence changes in AMP8. A second signal test which shuts down borehole 3 and pumps the well at Moors Gorse was put on hold following a diesel spill during a theft on site. This is now progressing again following a significant process to complete the pollution removal. This will assess changes to flows further upstream in the Rising Brook catchment.

Lichfield Tributaries
A desk study was completed to assess impacts on the Little Hay Brook as a result of proposed No Det licence changes in AMP 8 and agreed no further work except implementation of licence change in AMP8.

It has been agreed that ecological monitoring will be undertaken in the first year of AMP8 on the Darnford Brook to get a WFD classification to assist with identifying appropriate geomorphological improvements in the watercourse. This course of action has been chosen as opposed to licence changes as a modelling undertaken in the AMP7 identified that licence reductions would not directly impact or improve flows in the Darnford Brook.

As outlined last year, we have agreed our future no det sustainability reductions with the local EA teams.

3.5 Deployable output (DO)

Revisions to the WRMP24 AR tables no longer include a deployable output figure for outturn data, which now report total water into supply instead of water available for use (WAFU). The DYAA adjusted tables include deployable output, which is WRMP24 deployable output, adjusted for long term reductions to supply. No adjustments have been made to deployable output for changes to supply, or for reductions due to sustainability change implemented in the year. Accordingly, deployable output for 2024/25 is 424.4 Ml/d, as per WRMP24.

3.6 Water available for use

Once minor imports and exports have been accounted for, operational use, raw water and treatment works losses are deducted 2024/25 WAFU is reported as 345.5 Ml/d, 83.3 Ml/d above WRMP24 Final Plan. Outturn Water into Supply is 349.6 Ml/d.

3.7 Bulk supply agreements

We provide several bulk water supplies to Severn Trent Water – including a significant volume from our River Severn treatment works – and receive a very small number in return. We have a number of emergency bulk supply points close to our border so that we can share resources if the need arises.

There have been no changes to bulk supply agreements during the review period.

3.8 Imported and Exported potable water

Outturn potable water imported is 0.05 Ml/d and potable water exported is 36.4 Ml/d. These are legacy cross border supplies to and from neighbouring water companies and are not subject to bulk supply agreements and are under standard commercial terms and consumption varies based on demands.

3.9 New appointments and variations (NAVS)

As per previous annual returns, we have included supplies for NAVs in our total DI figure, we continue to see an increase in these volumes as new NAVs are granted licences in our area,

and existing developments are populated. As such, we are now monitoring these separately and can report on consumption volumes separately.

The bulk transfer agreement indicates the maximum demand the development can take, but the actual demand is measured using meters on our network, and this volume is included in total distribution input.

The following table outlines the existing NAVs in our area:

Table 2 Licensed water undertakers in the South Staffs area

Licensed undertaker	Number of sites in SST operating area	Properties
Independent Water Networks Limited	9	2963
Leep Networks (Water) Limited	4	2696
ESP Water Limited	3	1492
Icosa Water	2	170
Total	18	7254

3.10 Climate change impact on supply

We completed work on the impacts of climate change for WRMP24. We have made no changes to this nor to any other changes to our supply forecast. There has been no change to deployable output due to climate change, and so this has not been included in our deployable output figure

3.11 Unbilled water

Unbilled water consists of the sum of legal and illegal unbilled water.

Legal unbilled water is the volume of water used by our customers and not billed such as standpipe water use, voids with consumption and accounts held in query. Components are measured company specific estimates, this year it was 4.19 Ml/d.

Illegal unbilled water is, by the very nature of this component, an estimated volume. It is generally described as water theft and covers water use which the company is not generally

aware of. This year it was 0.86 Ml/d. These estimates go through an annual auditing process.

In total water taken unbilled was 5.05 Ml/d compared to the forecast of 1.76 Ml/d.

3.12 Distribution system operational use (DSOU)

In 2024/25 DSOU was 1.18 Ml/d, compared to forecast of 0.42 Ml/d, this use of potable water incorporates uses from our network due to operational reasons and is not leakage or customer use. Treatment work losses and other operational use such as run to waste and not recorded in distribution input was 18.85 Ml/d compared to the forecast of 18.63Ml/d.

3.13 Drought Plan

Our current drought plan was published in April 2022 and there have been no changes to this since this date. Our review of summer 2022 did not identify any changes required to the plan although we will add detail as required from the 2022 drought to the next drought plan as an additional reference drought period.

During 2024, we carried out a pre consultation on our next draft drought plan. This will inform the publication of our revised draft drought plan for public consultation later in 2025. The Blithfield potable infusion drought option will no longer feature in our revised plan following detailed work to understand the benefits to supply concluding that this would be very small and carry additional risk in a drought scenario.

4. Demand

4.1 Impact of weather events on demand

The peak demand period in 2024/25 was seen over 23rd – 29th June 2024, with a peak day of 351.5Ml/d. Average Day peak week was 347.9 Ml/d coinciding with the warmest period of the year. In terms of overall demands 2024/25 was a normal year, without exceptional demand increases due to weather.

The winter of 2024/25 did see a freeze/thaw event between 12th and 15th January 2025 seeing a period of increased demand due to increased leakage, of around 20-25 Ml/d above expected over 3-4 days.

During 2024/25 we were well prepared and due to planning through weather tracking, and resource readiness, we were able to respond quickly to increases in leakage. We managed to keep leakage generally on a downward trajectory, with a Christmas period rise in leakage but then being driven down during the 2024 winter months.

4.2 Demand Profile

The Post MLE Distribution Input (DI) for South Staffs Water is 319.7 Ml/d.

Throughout this AMP period, DI was heavily affected by both Covid-19 and some unprecedented weather events. When forecast WRMP DI is compared to outturn DI, it has remained above forecast figures. Despite this DI was relatively flat around 324 Ml/d for the reported outturn average DI for 2020/21, 2021/22 and 2022/23. For 2023/24 it reduced and has reduced further in 2024/25, a reflection of our efforts to reduce overall DI through water efficiency and leakage reductions.

The Annual Review 2024/25 DI is 0.03 Ml/d higher than the dry year annual average forecast in the WRMP24 of 319.4 Ml/d.

4.2.1 Leakage

Leakage has continued to reduce over the five years of AMP7 and is below forecast for 2024/25, reporting 58.4 Ml/d vs a forecast figure of 61.5 Ml/d. As outlined in further detail in section 4.4 the WMRP19 target was set prior to the Ofwat methodology, our Ofwat target for 2024/25 was 56.2 Ml/d.

4.2.2 Per Household Consumption (PHC)

Table 2 shows the movement of Household Consumption (excluding Supply Pipe Leakage and Meter Under Registration) for the period 2019/20 (pre-covid) to AR24 (Ml/d). This shows the effect of the Covid-19 pandemic, and the weather-related increase in household consumption.

Consumption was lower in 2024/25 than the WRMP24 forecast for both measured household consumption and unmeasured household consumption – most noticeably in measured properties- by a total of 16.9 Ml/d. Household demands below the forecast, are reflected in our continued water efficiency efforts and that it was a normal year. Overall, we expect demands to be on track with our revised forecast.

Table 2 Household consumption

	APR20	APR21	APR22	APR23	APR24	APR25	WRMP Forecast 2024/25
Measured Household Consumption (Ml/d)	56	63	71	64	60	67	88
Unmeasured Household Consumption (Ml/d)	113	138	132	130	126	123	123
Total Household Consumption (Ml/d)	169	201	203	194	186	190	212

4.2.3 Per Capita Consumption (PCC)

Over the AMP we have had a significant focus on water efficiency which has supported this decrease in PCC. Alongside this we have established an internal stakeholder water balance working group, and a consumption monitor working group. These working groups continually assess the system billing and maintenance reports and have completed a deep dive on the billing reports to produce better data and information. During this year the working groups will continue to carryout assurance of the billing files and critical system files.

The per capita consumptions below compare the period 2019/20 to 2024/25 as 'in year' outturns vs WRMP19 DYAA. There is a consistent downward trend since the Covid-19 period.

Table 3 SST per capita consumption profile for the AMP to date vs. WRMP24

	APR21	APR22	APR23	APR24	APR25	WRMP Forecast 2024/25
Household measured (l/h/d)	134.76	119.92	110.46	110.46	121.80	130.7
Household unmeasured (l/h/d)	167.48	158.4	158.75	155.64	153.9	144.3
Average Household (l/h/d)	151.58	148.99	142.89	136.86	140.34	138.4

In 2024/25 PCC increased slightly from 2023/24 but remained lower than 2022/23. Measured PCC has increased from 2023/24 mainly due to data improvements in our meter readings. Unmeasured consumption has decreased, and we believe further reductions will continue into AMP8 due to our Water Efficiency programmes

We continue to maintain the long-established unmeasured household consumption monitor. Data within the model goes back as far as 2006 and is maintained on a regular basis. The process continues to be peer reviewed by Ovarro consultants and part of our assurance commitment.

We extract household consumption from our new billing system that we installed in 2023 called Aptumo. Meters are read once a year and billed twice yearly, with the second bill being based on an estimated reading. A significant amount of data validation has been undertaken during 2024/25 leading to the billing file maintenance and data quality being improved. We will continue this in the forthcoming year.

We have invested in the water balance throughout AMP7 and 2024/25. Investment has been made in our household consumption monitors, night use monitors, measured non-household consumption analysis, and water balance component studies. Using the water balance working group, and billing consumption working group, to internally challenge and review our processes.

Whilst outturn PCC is marginally above the WRMP24 forecast, we believe that focussed effort will continue to reduce PCC and that we will be below the WRMP24 rebased forecasted figure form 2025/26.

4.2.4 Non-Household Consumption

Since ‘Open Water’ came into force in 2017, non-household customers have had the choice of selecting their own retail billing company. As a result, we now access meter reading and consumption data via the ‘Central Market Operating System’ (CMOS), with a monthly report generated from merging the CMOS consumption reports with our own consumptions reports. The water balance working group has worked with our retail helpdesk to continue to improve the consumption data we receive.

Our measured non-household consumption in 2024/25 was 58.52 Ml/d, which is lower than the WRMP24 forecast of 63.0 Ml/d. We have improved our understanding of non-household consumption in the past year and completed a deep dive on the various categories of non-household consumption, which included more accurate review of the in-year Legacy Long Unread Meters and Long Unread Meters. This has included additional meter readings and review on our logged data records to calculate an average daily consumption (ADC), rather than the historic established method of allocating a standard ADC. We have also reviewed and adjusted consumption records we have received from the Retail Market through CMOS to address identified inaccuracies in non-household consumption. This has included where groups of properties or meters have been incorrectly allocated on reports.

As part of the water balance process we have got the Aptumo Billing Team to conduct more frequent file maintenance, and set up more rules in the systemised consumption report process to identify and remove erroneous customer readings. This is the first year we've had a full billing period with the Aptumo system and removal of readings was previously completed in a manual way. The processes have been audited as part of the Annual Performance Review and we will continue to apply this approach.

4.2.5 Development

Whilst expected growth has been curbed due to Covid, and has not yet fully picked up, 2,121 new connections were made in 2024/25. This is below the new build properties forecast of 2,810, but does not include all NAV properties, which are treated as a bulk supply for connection purposes.

4.2.6 Demand forecast, including population and property forecasting

We comprehensively revise our demand forecasts every five years. This was undertaken to inform our WRMP24 to update population, properties and forecast consumptions for the planning period. For 2024/25 outturn domestic properties connected was 542,039, lower than the forecast of 548,760.

4.3 Metering

The number of customers requesting for a meter to be fitted continues to be lower than required to catch up on the meter penetration position expected at this point. At our customer hub in Wednesbury, the team promote metering and regularly speak to customers on this topic. Customers have told us that the cost-of-living crisis is still their main concern in this region, and they do not wish to risk changes to their bill profile as many fear rises and prefer a predictable bill which does not fluctuate, as seen on rateable values.

Our WRMP19 strategy was for optants to increase our penetration. Covid-19 impacted on this as customers were unable to have meters fitted and had focus elsewhere. These two events are outside of our control and have contributed to completing less optants, and therefore a lower meter penetration than predicted.

Households are entitled to a free meter installation (optants) which will continue to be the case in AMP8 and AMP9 however during these AMPs we are also delivering our universal metering programme in tandem, both meter fitting routes aim to achieve meter penetration as close to 100% as is possible.

In 2024/25, 3,699 unmeasured households in the South Staffs region switched to a meter, and we installed 28 new meters to previously unmetered non-household premises. We have also had 2,121 new connections, both domestic and non-household, to our network which have all had meters fitted.

As such, the year-end total meter penetration for 2024/25 is 47.9%. This compares favourably to the WRMP24 forecast of 44.7% meter penetration (including voids) of 41.5%.

We continued to renew household meter connections during the review year and have replaced 1,867 meters in 2024/25. We have also replaced 240 non-household meters.

4.4 Leakage

Total leakage in 2023/24 is 58.4 Ml/d. This compares to our Ofwat target of 56.2 Ml/d and the WRMP24 forecast of 61.5Ml/d

In 2024/25 leakage was reduced by 5.7 Ml/d from 64.1 Ml/d in 2023/24. This is a reduction of around 9% in a year, reflecting our commitment to achieve our target. We have failed the Ofwat target due to the impact of the three year rolling target. Due to the three year rolling our leakage numbers still contain 2022/23 outturn, which was much higher than we would have wanted due to the extremely hot weather, freeze thaw winter and cyber incident we had.

We continue to calculate bottom-up leakage using data obtained from DMAs, which monitor an area of approximately 1,000 to 2,000 properties. We provide further details of our 2024/25 leakage and PCC performance in the annual performance report (APR) that we will submit to Ofwat in July 2025.

4.5 Consistency in reporting methodology

We achieved full compliance in 2024/25 for per capita consumption in both regions.

4.6 Water efficiency

We have continued with our BAU water efficiency activities. These include:

- Use of Get Water Fit – online and virtual customer water efficiency audits and provision of water saving devices.
- Water efficiency messaging with social media and our website.
- Engagement at local community events promoting metering and sharing water efficiency advice and products.
- Education in schools in our region.
- Direct engagement with our customers at our Customer Hub at Wednesbury – sharing metering and water saving advice, as well as support for vulnerable customers.
- Offering of incentives to Developers for water efficient house building.

During 2024/25 the Company has distributed over 17,895 water saving devices in the South Staffs region saving circa 0.16Ml/d.

We have continued with our PCC plan throughout 2024/25, and in addition to the BAU activities outlined above, we have delivered two notable schemes outlined below.

WRMP19 target position for average PCC at the end of 2024/25 was 138.4 l/p/d. Our actual outturn is 140.3 l/p/d.

4.6.1 Water Efficiency in Faith and Diverse Communities

In April 2025, we completed and delivered our Ofwat Innovation funded project, Water Efficiency in Faith and Diverse Communities (WEFDC).

The project focused on exploring the intricate relationship between faith, culture, and water use practices. Through in depth research and testing of engagement strategies, including the selection of effective messengers and partnerships, valuable insights were gained to engage communities and build trusting relationships. Over spring and summer 2024 two bespoke water saving behaviour change campaigns were delivered in areas deemed to have the largest water saving opportunity linked to faith and culture – the first campaign related to faith (Wudu in the Muslim community in Cambridge) and the second campaign related to culture (rice washing practices in Southeast Asian communities across the West Midlands).

It was challenging to quantify the water saved in both campaigns given the nature of the campaigns being largely through social media and other online platforms over the six-month period. External factors like outdoor water usage and limited household meter data affected measurements. The Wudu campaign, analysed by Artesia consulting, suggested potential savings of up to 5,900 litres per day per household in Cambridge alone. However, the impact extended beyond Cambridge through various engagement channels (e.g. Bangla TV, YouTube, radio and many tourists visiting the mosque). The Rice washing campaign, achieved over half a million views, aimed to save water by altering rice washing practices to save up to 5 litres for every wash. However, data limitations call for further studies to validate these findings and recommend a control group for better analysis in the future.

A key output produced was the “WEFDC Toolkit” developed to guide water companies and practitioners in creating water-saving behavioural change campaigns in faith and diverse communities. The toolkit, structured in a six-step process, offers flexibility and guidance for developing similar projects. It includes supporting tools, templates, and real-life examples from the WEFDC project. The toolkit begins with a glossary of respectful language and is designed for easy accessibility with clear writing and organised formatting. It aims to support understanding and navigation for all users. The project highlighted the need for innovation in water-saving devices, particularly in cooking practices that involve significant water usage in many cultures. It encourages water companies to embrace multiculturalism and reconsider how they engage with faith communities to address evolving needs and promote inclusive services.

Alongside the WEFDC toolkit, we published the project’s final report which shared the key learnings and insights from the project which was disseminated to the wider sector through

a final knowledge sharing showcase session facilitated by Spring on 30 April. The final report can be found here: wefdc-final-project-report_v2-_30apr25.pdf.

4.6.2 Nectar scheme

As reported last year, a successful Ofwat Innovation Fund bid looking at incentivisation through Nectar points started. This is being completed jointly with Severn Trent Water and is being trialled in Severn Water's area. We are supporting the programme to take the learning from the outputs and share across both of our regions.

4.6.3 Behavioural change campaigns

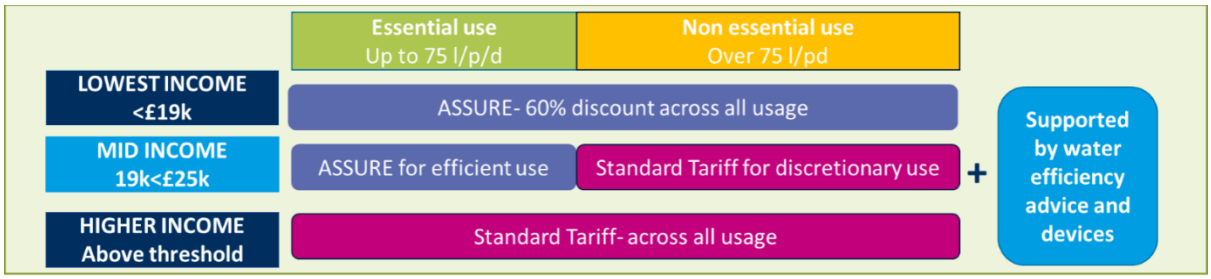
In 2024, we delivered a second highly successful behavioural change in our Cambridge region, called "Yes we Cam", following on from 2023's "Can for the Cam" campaign. Yes we Cam called on customers to make pledges to change their behaviour to reduce water, and focused on reducing the impact from leaky loos. Overall, the campaign delivered 1.36 Ml/d. We are looking at how we take the success of these two campaigns and deliver the benefits in the South Staffs region, adapting it to ensure it is appropriate and relatable, and create the clear link to the cost savings that can be achieved as a result of reducing consumption, which we know is a clear focus are of our customers in this region.

4.6.4 Eco Tariff Trial

As highlighted above, affordability is a key concern for our customers and drives their behaviour and relationship with water. Towards the end of year 5 we launched an eco-tariff trial for customers that are not eligible for our Assure tariff but are still struggling to pay due to the cost-of- living crisis. The trial offers the Assure 60% discount on their essential usage only, based on number of occupants.

The below diagram shows how the tariff aligns to our existing tariff structure, with eligible customers receiving the Assure discount tariff up to their essential use threshold and paying the standard tariff for usage above this level.

This approach has been supported with water efficiency advice and devices to help the customer manage their usage levels and reduce their bills through reducing consumption, in addition to the discounted support. Customers must be on or opt for a meter to be eligible for the tariff.



The trial is still in its early phase and it is too early to see the benefit from it, however it has already enabled us to support more customers and enhance affordability. As we progress through the trial we will track the consumption changes and assess through surveys whether our customers are using and valuing their water differently due to the trial. We will also ask participants about the impact this has on their mental and physical wellbeing, to analyse any risks of increasing bill anxiety with the threshold levels or reducing essential usage for hygiene, to ensure we consider any unintended negative impacts for customers.

4.6.5 Non-household consumption reduction

In preparation for AMP8 we have been building relationships with large non-household users and exploring where we can achieve the most consumption reduction.

5. Headroom and options

5.1 Target headroom

We update our target headroom every five years as part of the WRMP process. This was recently undertaken for the WRMP24 update.

We have included the WRMP24 target headroom of 9.8 Ml/d in our DYAA adjusted data tables for this submission. We have not uplifted target headroom for the dry year factor as this is not appropriate for the uncertainties included in headroom. Target headroom for WRMP24 has slightly increased from WRMP19.

5.2 Selected options

In our WRMP19, we identified the need to undertake work at Somerford and Slade Heath to improve the output from these sites to support our forecasts and improve our resilience. A feasibility trial has been completed which has indicated that further work is required to be able to finalise the solution. We expect the scheme proposed to be completed in 2025/26. This aligns with our WRMP24 data tables.

5.3 Supply-demand balance

We have a positive outturn supply demand balance for 2024/25 of 29.9 Ml/d compared to the forecast of 12.9 Ml/d for a dry year (WRMP19 figure for 2024/25 used), this aligns with expected forecast figures. This is following revised methodologies for the representation of outage in the supply demand balance calculation.

The DYAA adjusted supply demand balance is 1.1Ml/d, a reflection of planned outages required for continued delivery of our capital maintenance plan. With continued elevated PCC following Covid, and increased leakage it is encouraging that this is positive, an indication of the improvements we have made in both areas

6. Forward look

Whilst we have not achieved our 2024/25 forecast position for metering or PCC, overall, we have reported a favourable outturn position. We have shown consistent improvement in both areas demonstrating our commitment to meet our targets and are on track to do so in AMP8. Weather effects on supply and demand through the year were unremarkable, however the overall below average rainfall may have an impact on 2025/26 water resources position.

We continue to focus on reducing unplanned outages, whilst delivering on our long-term investment plan for treatment improvements at our surface water WTW, which we are pleased to have now completed. We have ensured that customers have a secure supply of high-quality water, provided in an environmentally sustainable way whilst these improvements have been made.

We have been able to improve our leakage position with a reduction of 9% in the year, a considerable success. We expect to meet the forecast for PCC in AMP8, following the inclusion of a revised baseline for the consumption forecast, based on the changes seen following Covid, which have become the norm in our supply area where a return to pre Covid work patterns and demands has not been experienced.

With the second part of 2024/25 seeing below average rainfall, albeit with water resources in a good position, we may see dry weather challenges for both supply and demand into 2025/26. We will be reviewing and updating our drought plan during 2025, incorporating updates from this process as necessary whilst following our existing plan in the event of dry weather. Our revised approach to conservation of levels at Blithfield reservoir during Spring adopted following lesson learnt during the dry summer of 2022 will put us in a strong position to manage these challenges

As we enter a new planning period with WRMP24 we have made stretching commitments to continue to manage demands with an ambitious metering programme to reach universal metering with Smart meters, alongside water efficiency activity. This programme will require extensive communications with customers to inform them of the reasons behind our metering strategy, and to reassure more vulnerable customers that we will provide sufficient support and protection against bill increases. Our water efficiency objectives will allow us to meet abstraction reductions to remove the risk of environmental deterioration in the region, without the need to develop any additional supply side options.

We will continue to work with all sectors in the region and with groups like Water Resources West to ensure abstraction is sustainable and meets the needs of water users and the environment in our area of supply. WRW will be expanding our work with the non-PWS sectors, as we look to bring additional engagement and input from these sectors to support the development of the next regional plan.