



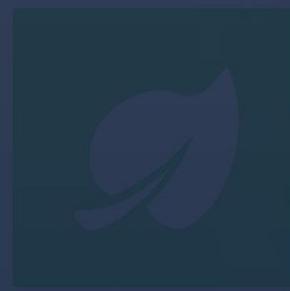
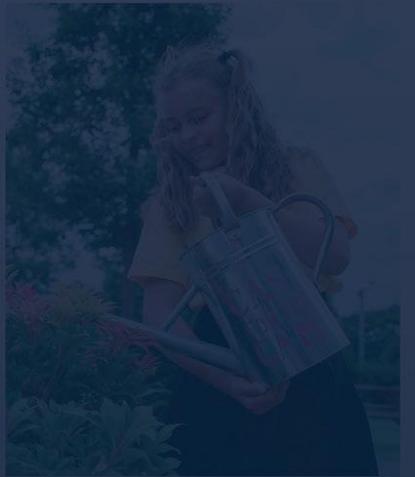
South Staffs Water



Cambridge Water



To help create a world where essential services and infrastructure deliver for customers, clients and our planet



Pollution Incident Reduction Plan (PIRP)

March 2026

South Staffordshire Water PLC

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Executive Summary



Elena Karpathakis
Managing Director

The publication of our first statutory Pollution Incident Reduction Plan (PIRP) marks an important milestone for South Staffs Water and Cambridge Water. It strengthens our environmental performance and demonstrates our commitment to transparency, accountability and continuous improvement. From this year onwards, our PIRP will provide a clear and open account of our performance, the actions we have taken, and the progress we are making to protect the environment year after year.

We supply clean drinking water to more than 1.7 million people across two regions. Although we do not provide wastewater services, we recognise that failures on our clean-water network, such as burst water mains, can still have environmental consequences when water enters a watercourse. We take full responsibility for preventing pollution arising from our assets.

We are pleased to report that we recorded no Category 1 or 2 incidents in 2025, keeping us on track to meet our AMP8 commitment of zero serious pollution incidents. This PIRP outlines that in 2025, seven Category 3 pollution incidents were attributed to our operations, all resulting from burst water mains. While none of these incidents were serious, it does not negate the importance.

Throughout 2025 our teams worked hard to implement key measures which minimised our pollution risks from burst mains. This included £6.3m of targeted investment in mains upgrades, alongside robust leakage monitoring and detection that enabled many repairs to be completed before a burst could develop. We continued to pressure regulate our network using methods of industry best practice, established new internal procedures and delivered pollution reporting training to our staff.

We recognise that accurate and timely self-reporting is fundamental to building confidence in our performance. In 2025 we fell short of this expectation. We are committed to enhancing the internal procedures we have in place and delivering further training across operational teams to strengthen both self-reporting and incident response.

Our planned programme for 2026/27 builds on our strong focus on pollution prevention. Through further targeted investment in water mains renewal and resilience improvements, we will reduce the likelihood of bursts and continue to strengthen the performance of our network, while minimising potential environmental impacts. These actions complement wider operational improvements and support our commitment to managing risk proactively.

Our customers rightly expect high standards from their water provider in regards to pollution performance. As an industry, we must continue to be transparent about performance and improvement plans. At South Staffs Water and Cambridge Water, I am committed to ensuring we maintain rigorous governance and foster a culture that values environmental protection in every part of our organisation. This plan forms one part of a broader programme of environmental stewardship.

As Managing Director, I am clear that our responsibility goes beyond meeting statutory requirements. We must lead in protecting the environment, maintaining public trust, and contributing to healthier rivers, groundwater and ecosystems. This PIRP reflects that commitment and sets out the actions we will take to deliver it.

Overview of South Staffordshire Water

South Staffordshire Water operates across two regions of the UK under a single water supply licence. Through South Staffs Water (SSW) and Cambridge Water (CW) we provide clean water services across both regions. South Staffs Water covers a service area of approximately 1500km², serving 1.4 million people and 34,000 businesses. Cambridge Water (CW) covers a service area of approximately 1,175km², serving 350,000 people and 9,000 businesses. The two regions are shown in figures 1 & 2. We do not supply sewerage services. The total distance of our potable water distribution network is 8,765km.

Legal context and compliance obligations

SSW and CW operate within a regulatory framework that places clear legal obligations on protecting the environment and preventing pollution. Our legal regulators for pollution incidents are the Environment Agency who cover reporting, monitoring, investigation and enforcement, while Ofwat applies financial incentives or penalties through performance commitments. The Water (Special Measures) Act 2025 inserted a new statutory duty into the Water Industry Act 1991, for all water companies operating in England and Wales to prepare and publish annual Pollution Incident Reduction Plans (PIRPs) from 2026 onwards. The provisions of the Act require each relevant undertaker to set out how it intends to reduce pollution incidents attributable to its operations and must publish its plan before 1st April each year.

In subsequent years (2027 onwards), the PIRP will be published alongside an Implementation Report which will review the extent to which the planned pollution prevention measures outlined in the previous year's PIRP have been implemented. The publishing of these documents aims to increase transparency about the steps being taken to address any performance issues, reduce pollution incidents and minimise impacts on the environment.

In addition to these new requirements, SSW and CW must meet ongoing compliance obligations set by the Environment Agency (EA). The EA assesses water company environmental performance annually and publishes their assessment through the Environmental Performance Assessment (EPA). The EPA monitors metrics including the number and severity of pollution incidents, self-reporting rates for category 1-3 incidents, and permit compliance at treatment sites. The EPA has been a reporting tool for water and sewerage companies for several years and is recognised as important for understanding cross company comparisons. An annual environmental performance report is newer for the water only companies, and it is going through a development phase as the Environment Agency shape the most transparent way to report performance. SSW and CW are responsible for self-reporting all pollution incidents to the EA in accordance with national Water Industry Regulation Incidents (WIRI) guidance.

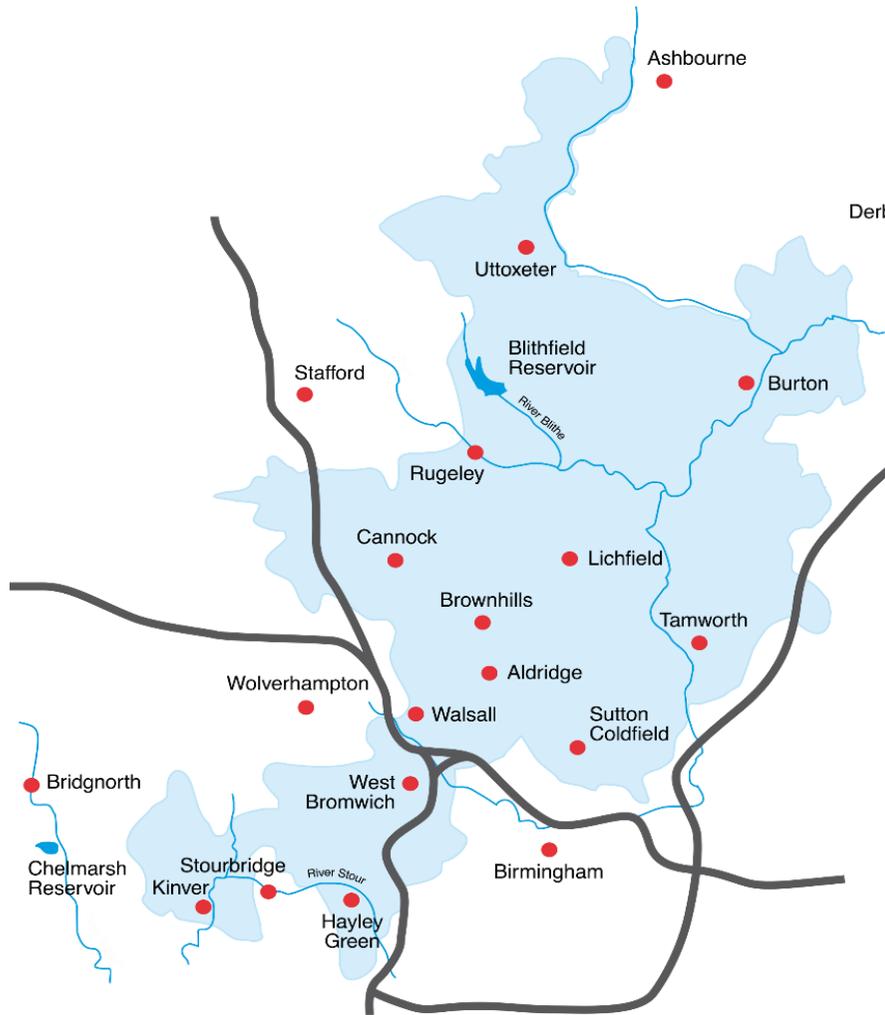


Figure 2. South Staffs Water supply region



Figure 1. Cambridge Water supply region

What is a Pollution Incident?

A pollution incident is defined in section 205A (3) of the Water Industry Act 1991 as discharges of any content from the undertaker's system which may be harmful to health or the quality of the environment. This does not include discharges of treated effluent operating in compliance with an environmental permit.

The [Common Incident Classification Scheme \(CICS\)](#) guidance also describes how the Environment Agency assesses and records the seriousness of a pollution incident using the below categories:

- Category 1 – major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
- Category 2 – significant impact or effect on the environment, people and/or property
- Category 3 – minor or minimal impact or effect on the environment, people and/or property
- Category 4 – substantiated incident with no impact

All potential and actual incidents reported to the Environment Agency are logged on the National Incident Recording System (NIRS). At SSW and CW we align our incident reporting with the relevant Environment Agency guidance.

Pollution risks

As water-only companies, the principal pollution risks associated with SSW and CW operations arise from treated water entering a watercourse. Key risks include:

- Chlorinated water pollution from burst water mains, where large volumes of treated water containing chlorine can enter surface waters or groundwater.
- Repair works following a burst main can require ground disturbance and excavations which can create a risk of silty runoff.
- Discharge of treated effluent from water treatment sites under abnormal conditions or system failures, where water that does not meet permit conditions may enter the environment.
- The temporary discharge of waters unsuitable for drinking water supply could create a risk if the criteria of RPS280 are not met.
- The use of chemical substances or fuels at our sites carries a risk of spillage

While small leaks on the network typically release low volumes of water and pose minimal environmental risk, burst water mains present a significantly higher pollution risk due to the sudden, large-scale release of chlorinated water. These larger bursts can mobilise sediments, erode watercourses, and introduce chlorine at concentrations harmful to aquatic ecology.

Scope of this plan

This Pollution Incident Reduction Plan (PIRP) has been prepared in accordance with the statutory requirements detailed in sections 205A–205B of the Water Industry Act 1991 (via the [Water \(Special Measures\) Act 2025](#)) and the associated guidance document published on the Environment Agency website ([Pollution Incident Reduction Plans and Implementation Reports: how to prepare and publish](#)).

As we are one company under a single water supply licence, we are publishing one PIRP to cover both of our regions.

This plan also aligns with:

- [The South Staffordshire Water PLC Business Plan \(2025-2030\)](#).
- The information contained on NIRS for the incidents being discussed.
- EPA dashboard data on self-reporting rates.
- Environment Agency guidance documents – Common Incident Classification Scheme (CICS), reporting and assessing Water Industry Regulation Incidents (WIRI).

The purpose of this plan is to:

- Provide a transparent account of pollution incidents (Category 1–3) that were logged on NIRS in 2025 and were attributable to our assets.
- Outline the root causes and contributing factors associated with these incidents.
- Highlight and review existing measures that were used in 2025 to maintain our assets and mitigate pollution risks.
- Set out additional targeted and proportionate measures to reduce the likelihood of similar incidents occurring in future years.
- Outline the planned delivery timeframe and estimated incident reduction impact for these additional measures.
- Demonstrate alignment with regulatory expectations and the wider environmental assessment framework used by the Environment Agency (EA).

Exclusions from this plan are detailed below:

- As a water-only company, we have no statutory requirement to prepare or publish a Drainage and Wastewater Management Plan (DWMP), which applies only to sewerage undertakers. For this reason, DWMP related information is not included in this PIRP.
- Although we report and review Category 4 incidents as part of our operational and risk management processes, these are not included within the scope of this PIRP. This is because the statutory requirement under the Water (Special Measures) Act 2025 applies to pollution incidents attributable to the company's system, and Category 4 events are classified as having no environmental pollution impact.
- Asset types that did not experience any Category 1–3 pollution incidents within the reporting year are not discussed in the measures section. This ensures the plan has a clear focus on priority risk areas and aligns with the statutory purpose of the plan, which is to reduce the recurrence of incidents that have occurred.

2025 Performance

A total of seven incidents were attributable to our operations in 2025, as shown in tables 1 and 2. The immediate cause of each incident was a burst water main, with six of these bursts impacting buried pipework (table 1) and one impacting a rising main (table 2). Additionally, one of the six buried distribution network incidents occurred in the Cambridge Water region with the remaining six incidents taking place in the South Staffs Water region.

Table 1. Frequency and seriousness of pollution incidents from buried Water Distribution Network in 2025

Month	Category 1 pollution incidents	Category 2 pollution incidents	Category 3 pollution incidents
January	0	0	1
February	0	0	0
March	0	0	0
April	0	0	0
May	0	0	0
June	0	0	3
July	0	0	0
August	0	0	0
September	0	0	0
October	0	0	2
November	0	0	0
December	0	0	0

Table 2. Frequency and seriousness of pollution incidents from Rising Mains in 2025

Month	Category 1 pollution incidents	Category 2 pollution incidents	Category 3 pollution incidents
January	0	0	0
February	0	0	0
March	0	0	0
April	0	0	0
May	0	0	0
June	0	0	0
July	0	0	0
August	0	0	0
September	0	0	1
October	0	0	0
November	0	0	0
December	0	0	0

Published March 2026

There were zero Category 1-2 incidents caused by our assets during 2025 (see table 3); therefore, the organisation remains on track to achieve its Ofwat Performance Commitment of zero serious pollution incidents in AMP8. Additionally, there were no Category 1-3 incidents associated with treated effluent discharge operated under an environmental permit.

An incident is determined to be a self-report where the water company has informed the Environment Agency of the details of the incident prior to another party such as a member of the public. Of the seven Category 1-3 incidents which occurred, two of these were recorded as a self-report by the Environment Agency which is a rate of 29% (see table 3). This is below expectations of both the Environment Agency and the performance we are committed to, therefore an increase in the rate and timeliness of self-reporting will be a key focus of improvement going forwards.

Table 3. Performance metrics during 2025

Metric Description	Regulating Authority	2025 Performance	Expected Performance	Applicable timeframe
Self-reporting of pollution incidents (Category 1-3)	Environment Agency	29%	80%	2025 Calendar Year
Number of serious pollution incidents (Category 1-2)	Ofwat	0	0	April 2025-March 2030

As shown in table 4 the root causes of all Category 1-3 incidents in 2025 related to damaged pipework, with the Environment Agency assigning six to pipe failure below ground, and one to accidental spillage from pipework. There are multiple risk factors that contribute to pipe failure and bursts within our network. A primary factor which contributes to burst pipes is variable weather patterns and the specific environmental conditions where the pipes are located. The weather patterns of concern include freeze thaw conditions during colder months, where very low temperatures cause the surrounding ground and water in isolated parts of the network to freeze. This places additional pressure on pipework both externally and internally. Where temperatures quickly rise again, the rapid thawing process leads to sudden changes in pressure and ground movement, increasing the risk of pipe damage and bursts.

In addition, damp and waterlogged ground conditions can accelerate the natural corrosion of buried metal pipes. When soil remains wet for long periods, moisture and minerals in the ground react with the pipe’s surface, gradually breaking down protective coatings and thinning the pipe wall. As the metal becomes more vulnerable, the risk of operating pressures, freeze thaw events or ground movement causing leaks or bursts increases.

Extended periods of hot and dry weather can also have an adverse impact by causing the ground to shrink as the soil loses moisture. This natural movement of the ground places additional pressure on buried pipework. As the soil settles or shifts, pipes may be pushed out of alignment or experience increased pressure at joints. These changes can weaken the pipe over time or lead to sudden failures.

Table 4. Causes of Category 3 pollution incidents from asset types in 2025

Asset type	Immediate Cause	Root cause	Number of Category 3 pollution incidents	Proportion of Category 3 pollution incidents for asset type (%)
Water Distribution Network	Containment and Control Failure	Pipe failure below ground	6	100
Rising Main	Containment and Control Failure	Accidental spillage from pipework	1	100

Existing Incident Prevention Measures

SSW and CW's priority focus for reducing burst main incidents has been to invest in prevention measures such as asset improvement by undertaking pipework renewal programmes across the network. Specifically, replacing metal pipework with high-performance polyethylene (HPPE) provides key benefits including corrosion resistance, long term durability and a flexible/ductile structure which is effective at absorbing pressures from ground movements and network flows. In addition, HPPE pipes can be installed using trenchless technology such as directional drilling which further minimises environmental impact.

As a result, the asset improvement measure has been highly effective at addressing the environmental factors which contribute to pipe failure and an estimated reduction of twelve burst main incidents during the 2025/26 financial year was attributed to the mains renewal programme (table 5). This incident reduction was calculated across both regions by profiling the average annual burst rate for the entire network and comparing the specific burst rate figures of the water main renewal locations against the network baseline. The average burst figures of the renewal locations were then recorded as incident reductions once the new pipework was installed. Locations for the completed renewal schemes (shown in [Appendix A](#) and [Appendix B](#)) were determined based on which groups of mains had the highest burst rate history.

The additional measures discussed in table 5 also had a crucial role in the prevention of burst main incidents in 2025 by utilising available technology and best practice methods. The calming of transient pressures within the network using pressure regulating valves (PRVs) significantly reduced burst risks, while telemetry connections and in person monitoring of District Metered Areas (DMAs) enabled proactive detection of leaks and completing of repairs before they escalated into bursts. As the mains renewal programme also involved replacement of air valves, PRVs and telemetry equipment in the relevant locations, the pressure calming and telemetry measures can be considered to contribute to the twelve-burst main incident reduction figure. As in person monitoring is informed by telemetry this can also be considered to contribute indirectly to the referenced incident reduction impact. All the existing measures described above will continue to be used and optimised going forwards.

While the above measures address the prevention of bursts, the introduction of new pollution management procedures and staff training on reporting addressed an improvement in the emergency response and reactive measures in place for mitigating the environmental impact of a burst after it has occurred. The impact of these measures could not be reliably quantified in terms of a total incident reduction because they are reactive by nature however we believe they have contributed towards preventing existing incidents from becoming more serious. Yet it is also recognised that staff training can be undertaken more widely, and current self-reporting rates are insufficient to meet Environment Agency expectations as highlighted in table 3. Therefore, further work will be undertaken to improve these areas as discussed in the planned measures section.

Table 5. Measures taken to maintain Water Distribution Network and Rising Mains in 2025

Measure	Description of actions	Scale of action(s)	Impact of the measure (Category 1-3 incidents prevented)	Root cause(s) addressed by the measure	Delivery status of the measure
Pressure calming	Internal network and leakage teams operate District Metered Areas (DMAs) which divide the water distribution network up into different sectors. Hydraulic models are used to set the appropriate pressure level for each DMA. In addition, Pressure Regulating Valves (PRVs) are used within the water distribution network to stabilise pressure levels and to reduce the risk of leakage/burst. All PRVs are inspected on a 2-year maintenance cycle.	DMAs in South Staffs Water region – 568 PRVs in South Staffs Water region – 308	10 category 1-3 incidents in South Staffs Water region 2 category 1-3 incidents in Cambridge Water region	Pipe failure below ground, accidental spillage from rising main	Setup completed, operationally ongoing
Telemetry data analysis	Pressure and flow data is monitored continuously for DMAs and for operational sites. For DMAs, night-time flows are used as a baseline for water consumption, which then informs leakage detection when spikes are observed. Automated alerts are also in place for DMAs where water pressure drops or increases beyond specified limits. These alerts prompt further investigation and/or a repair being scheduled	DMA's In Cambridge Water region – 138 PRV's in Cambridge Water region – 16		Pipe failure below ground, accidental spillage from rising main	Setup completed, operationally ongoing
In person monitoring	South Staffs Water and Cambridge Water employs field technicians to investigate the reports of leakage identified by telemetry data and to locate the exact source of the leakage. They utilise acoustic sensors to detect the presence of leaks below ground	43 field technicians across both regions		Pipe failure below ground, accidental spillage from rising main	Setup completed, operationally ongoing
Remedial capital asset improvements	The first stage of the AMP8 water mains renewal and upgrade programme was delivered for the locations determined to be most at risk of bursts. For water mains, this programme consists of the phase out of older metal pipes and replacement with corrosion resistant HPPE pipes	South Staffs Water region upgrades - 23.29km Cambridge Water region upgrades – 2.28km		Pipe failure below ground, accidental spillage from rising main	Completed

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Company culture or behavioural change	Internal procedures introduced to enhance understanding of the incident reporting chain, responsibility for each stage of a burst water main and actions required to mitigate environmental impact. These actions include chlorine testing and silt controls	2 procedures published internally		Incident response time and pollution containment effectiveness	Completed
Staff training	Training was delivered to our leakage team to support incident identification and awareness of reporting requirements	10 attendees at training session		Incident response time and pollution containment effectiveness	Completed

Planned Incident Prevention Measures

In assessing and reflecting on our pollution incident performance in 2025 we have designed a set of measures for implementation during the financial year of 2026/27. These aim to address key operational risks and the root causes of the incidents which occurred during 2025. Prevention of burst main incidents will be undertaken through a proactive risk assessment of all air valves and further mains renewal works to build on the progress made in the 2025/26 financial year (see table 6).

Air valves play a critical role in managing transient pressures, which are a known contributor to bursts in the distribution network. The air valve risk assessment and subsequent maintenance programme will support the overall hydraulic stability of the network and ultimately minimise risks of sudden pressure changes leading to main failures. This assessment is being carried out during the first two years of AMP8, with a prioritised programme of physical maintenance of the air valves beginning in the 2027/28 financial year once the risk assessment has been completed. As physical maintenance works will not be undertaken until the risk assessment has been completed, this measure is not expected to have a direct impact on incident reduction until the 2027/28 financial year.

As discussed in the existing measures section, there are significant benefits to replacing metal pipes with HPPE pipes. The mains renewal programme which aims to deliver 254km by the end of AMP8 will continue to be rolled out in 2026/27 to increase network resilience to bursts. The lengths of replacement are similar and proportional to 2025/26, therefore the same rate of incident prevention is expected (estimated at 12 across both regions). In table 6, the km lengths stated for the mains renewal programme during the 2026/27 financial year are based on proposed schemes which could be subject to change depending on budget constraints and the balancing of operational priorities.

To address our underperformance in self-reporting, further training is planned to be delivered to a wider internal audience, covering all relevant departments and teams who respond to and manage burst main incidents as well as a general awareness piece across the business. Pollution response procedures will be also reviewed, updated and communicated as part of this training programme. These improvements will support operational teams in responding to incidents with greater effectiveness, confidence and clarity. It is also acknowledged that an increased understanding of reporting requirements may result in an increased number of incidents being reported in comparison with previous years. This may distort performance figures to some degree, however by gaining a more accurate picture of performance we will be in a stronger position going forwards to transparently manage and mitigate our operational risks.

Table 6. Planned additional measures for Water Distribution Network and Rising Mains in 2026/2027

Additional measures	Description of actions	Scale of actions in the next calendar year	Estimation of expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Implementation start date of the measure	Implementation completion date of the measure
Pressure calming	Inspection and risk assessment of all air valves across the distribution network. Each air valve will be assigned a risk rating to determine maintenance requirements and priorities. Well maintained air valves enable more effective control of transient pressures in the network.	Inspection and risk assessment of 4,416 air valves	10 category 1-3 incidents in South Staffs Water region	Pipe failure below ground, accidental spillage from rising main	April 2026	April 2027
Remedial capital asset improvements	Water mains renewal and upgrade programme delivered for the locations determined to be most at risk of bursts. For water mains, this programme consists of the phase out of older metal pipes and replacement with corrosion resistant high-performance polyethylene (HPPE) pipes.	South Staffs Water region upgrades - 23.2km Cambridge Water region upgrades - 2.1km	2 category 1-3 incidents in Cambridge Water region	Pipe failure below ground, accidental spillage from rising main	April 2026	March 2027
Company culture or behavioural change	Reviewing and strengthening internal procedures relating to pollution prevention and response.	The review will cover all pollution procedures		Incident response time and pollution containment effectiveness	April 2026	March 2027
Staff training Enhanced Incident Response	Training will be delivered more widely to increase awareness of self-reporting and incident response requirements across internal teams. This will empower individuals to self-report where required and implement pollution prevention measures appropriate to the level of risk. The training will cover the network and leakage teams as a minimum.		This may increase our category 1-3 as we upskill on identification.	Incident response time and pollution containment effectiveness	April 2026	March 2027

PIRP Summary

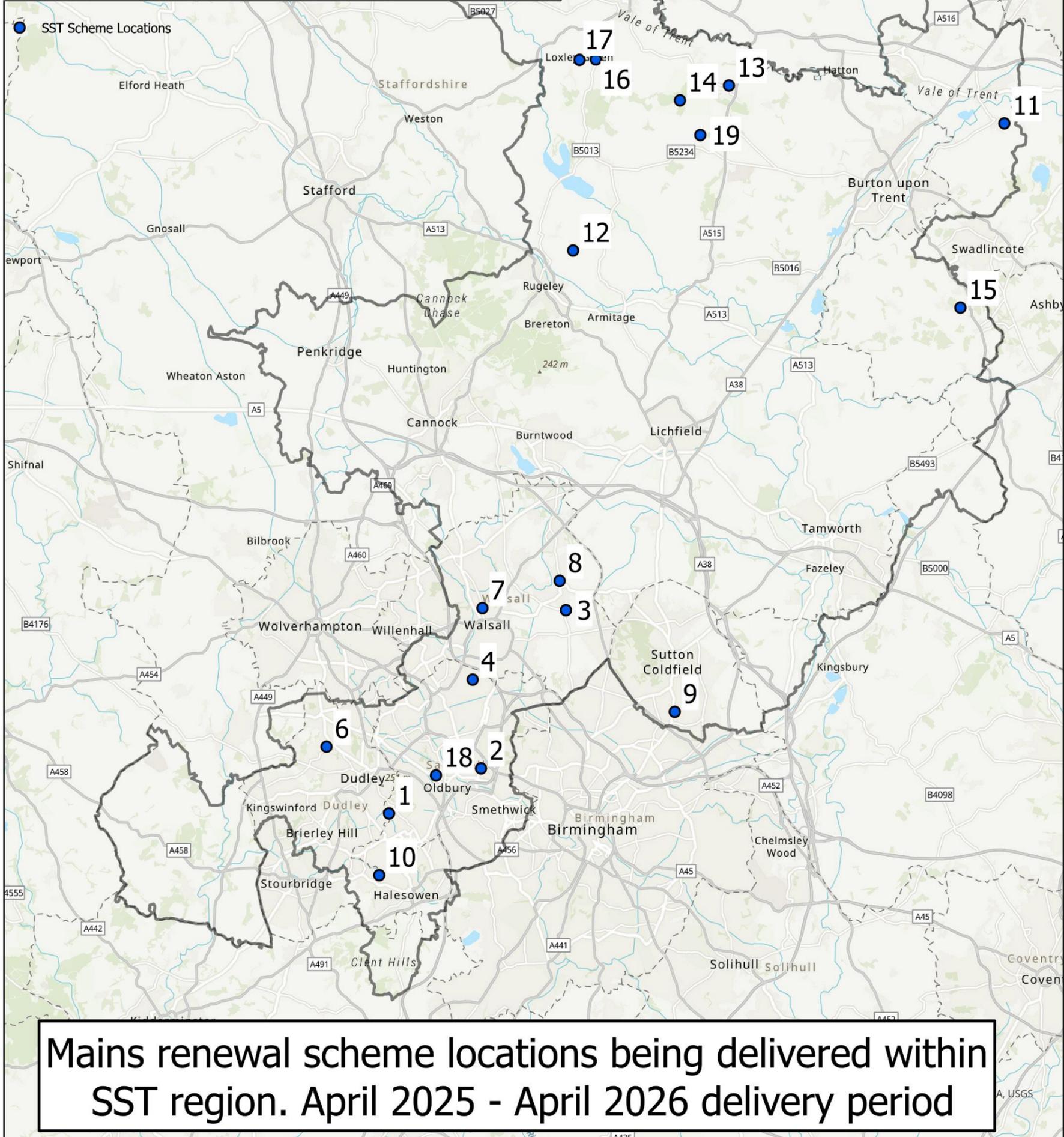
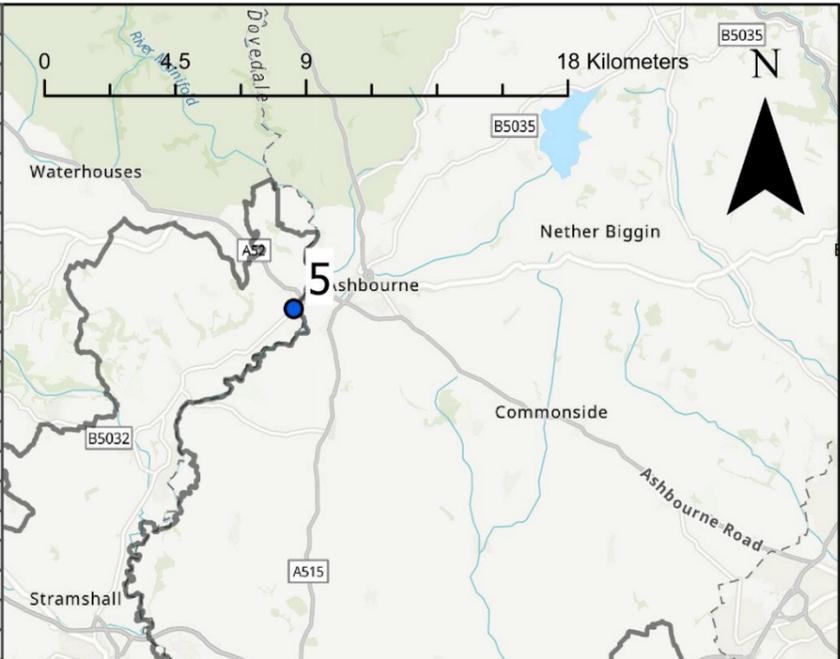
In 2025, seven category 3 pollution incidents from burst water mains were recorded across our network, providing a clear focus for our improvement actions for the coming year. Our EPA discussions with the Environment Agency identified that self-reporting performance fell short of the standards expected, and improving this is a priority for 2026. Through enhanced staff training, strengthened internal procedures and targeted investment in our network we are taking proactive steps to reduce the likelihood and impact of future pollution incidents relating to burst mains. We recognise that as we embed more consistent self-reporting across the business, the number of recorded incidents may initially increase. This reflects improved transparency rather than deteriorating performance.

We were pleased to report no serious pollutions in 2025 and our work in 2026 will continue to drive this positive performance.

We remain fully committed to accurately reporting all incidents, taking early action to prevent and minimise environmental harm, continuing to be open and accountable to our customers, communities and regulators as we work to deliver sustained improvements in our environmental performance.

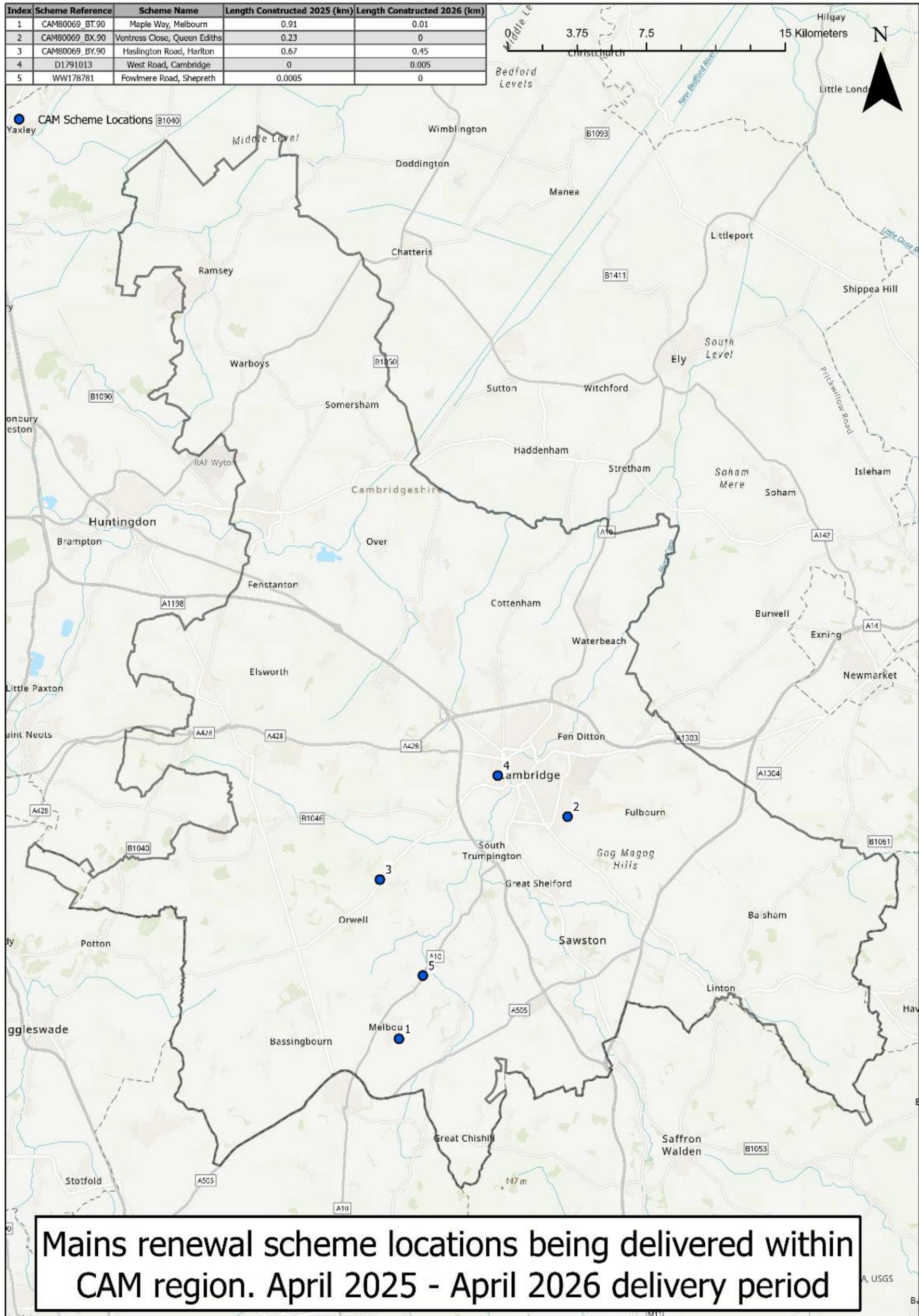
Appendix A – South Staffs Water Mains Renewal Scheme Locations (2025/26)

Index	Scheme Name	Length Constructed 2025 (km)	Length Constructed 2026 (km)
1	Blackberry Lane, Rowley Regis	0.93	0.7
2	Houghton Street, West Bromwich	0.87	0.68
3	Portland Road, Aldridge	0.57	0
4	Suffolk Road, Wednesbury	1.25	0
5	Ashbourne Road, Mayfield	0	0.57
6	Roberts Green Road, Dudley	1.29	0
7	Stafford Street, Walsall Phase 2	0.56	0
8	Edward Avenue, Aldridge, Walsall	0.41	0
9	Marchmount Road, Sutton Coldfield	0.82	0
10	Stourdell Road, Halesowen	0.56	0
11	Hillview, Repton, Derby	0.73	0
12	Blithbury Road, Rugeley	0.81	0
13	Toby's Hill, Draycott in the Clay	1.08	0
14	Marchington Woodlands	0.83	1.83
15	Linton Heath, Linton, Swadlincote	0	0.89
16	Willslock, Uttoxeter	0	1.73
17	Loxley, Uttoxeter	1.81	0.01
18	Albion Street, Oldbury	0.38	0.35
19	Holly Bush Road, Draycott	0	2.48
20	Long Meadow Drive, Sedgley	0	0.75
21	Wyatt Road, Sutton	0	0.4



Mains renewal scheme locations being delivered within SST region. April 2025 - April 2026 delivery period

Appendix B – Cambridge Water Mains Renewal Scheme Locations (2025/26)





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