Bristol Water Drought Plan 2018 Strategic Environmental Assessment: Post-Adoption Statement

Report for Bristol Water Plc

ED 62965 | Issue Number 1 | 21/06/2018

Customer:

Bristol Water Plc

Customer reference:

3500035354

Contact:

Shawn Beatson
Ricardo Energy & Environment
21 Prince Street, Bristol. BS1 4PH

e: John.Sanders@ricardo.com

Author:

Ed Fredenham

Approved By:

John Sanders

Date:

21/06/2018

Ricardo Energy & Environment reference:

Ref: ED62965- Issue Number 1

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1 Introduction

1.1 Background to the Drought Plan

Under the Water Industry Act 1991, Bristol Water Plc is required to prepare and update a Drought Plan for the approval of the Secretary of State for Environment, Food and Rural Affairs. The Drought Plan provides a comprehensive statement of the actions Bristol Water will consider implementing during drought conditions to safeguard essential water supplies to customers and minimise environmental impact. It is consistent with Bristol Water's Water Resources Management Plan, the objective of which is to set the strategic plan for ensuring a supply-demand balance over a 25 year planning period.

The draft Drought Plan must be made available for consultation with the statutory bodies and the public, including the Strategic Environmental Assessment (SEA) of the draft Drought Plan. Following review of the public consultation representations, the Secretary of State makes recommendations to Bristol Water to revise the draft plan to prepare a final draft of the plan for approval by the Secretary of State. This process took place during 2017 for Bristol Water's updated Drought Plan. In June 2018, the Secretary of State gave permission to publish the Drought Plan on the Bristol Water website.

1.1.1 The SEA Process

Bristol Water's draft Drought Plan 2017 was subject to Strategic Environmental Assessment (SEA) in compliance with the SEA Directive, as transposed in England by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations'). The SEA Environmental Report was issued for public consultation alongside the draft Drought Plan in early 2017. The SEA Environmental Report was then updated in light of comments received, as set out in the published Drought Plan Statement of Response (SoR)[1]. Following approval of the Drought Plan for publication by the Secretary of State, this SEA Post-Adoption Statement is being issued to accompany the published plan.

1.1.2 Purpose of the SEA Post-Adoption Statement

This SEA Post-Adoption Statement is produced in accordance with the provisions of SEA Regulation 16 (see **Appendix A**) which requires that a Statement be produced alongside the published Drought Plan setting out:

- How environmental considerations have been integrated into the Drought Plan 2018 (see Section 2)
- How the Environmental Report has been taken into account (see Section 3)
- How responses to the SEA Environmental Report consultation have been taken into account in preparing the Drought Plan 2018 (see Section 4)
- Reasons for choosing the measures contained in the Drought Plan 2018 (as adopted), and why other reasonable alternatives were rejected (see Section 3)
- The measures that are to be taken to monitor the significant environmental effects of implementation of the Drought Plan 2018 (Section 5).

[1] Bristol Water 2017. Bristol Water Draft Drought Plan: Statement of Response to public consultation (July 2017). Available at: http://www.bristolwater.co.uk/about-us/drought/drought-plan-update-2017/, Accessed 8th March 2018.

2 How Environmental Considerations have been integrated into the Drought Plan

The Environment Agency Drought Plan Guidelines (DPG)[2] requires that a Drought Plan sets out what actions a company will take before, during and after drought to maintain a secure supply of water. It also sets out how a company will assess the environmental effects of its proposed actions to maintain supply and what actions will be taken to mitigate for any damage. The Drought Plan must set out how to monitor the effects of the actions taken under the drought plan. The plan must also state the mitigation and compensation measures that will be carried out to minimise the impact of the actions on the environment.

The SEA reviewed all the environmental and social effects of the full range of drought management options included in Bristol Water's draft Drought Plan. Due to the nature of the statutory processes underpinning water company drought management, a Drought Plan must include all measures that the company may progressively need to take as the severity of a drought increases, including those that would only be needed in the worst possible drought. These measures will typically have very significant environmental effects, but are extremely unlikely to be required during the 5-year lifetime of the Drought Plan. As a result, Drought Plans generally encompass a basket of measures that may need to be implemented to take account of the unpredictable occurrence of a drought event, and thus the actual impact of the plan over its life is subject to significant uncertainties.

Bristol Water's Drought Plan therefore includes a range of possible measures to allow Bristol Water to respond to different severities and durations of drought events in the most appropriate way. Due to the differing nature of drought events and consequent different needs for implementing the range of available management measures, it is impossible to predict in advance which and how many of the measures will be actually be required.

The effects identified by the SEA informed the development of the draft Drought Plan that was issued to Defra in early 2017, in particular the timing and sequencing of the different drought management measures. The outputs of the SEA provided a comparative assessment of the environmental effects of implementing each drought management measure. Bristol Water used the SEA findings, along with operational and other factors, to determine the order of implementation of each drought management measure (as identified in Table 9 of the Drought Plan 2018). For example, the SEA provided commentary on the characteristics of any significant adverse effects and highlighted those measures with lower adverse effects and/or greater beneficial effects that could be selected ahead of those measures (or in preference to measures) with major adverse effects and/or negligible beneficial effects. Additionally, the SEA identified combinations of measures that may give rise to cumulative effects (adverse and beneficial).

Further consideration of the environmental and social effects, and prioritisation of drought management measures, was given following receipt of the consultation responses to the draft Drought Plan and/or the SEA Environmental Report, as described in Bristol Water' Drought Plan Statement of Response.

[2] Environment Agency (2017) *How to write and publish a drought plan,* April 2017. Available at https://www.gov.uk/government/collections/how-to-write-and-publish-a-drought-plan, Accessed 8 March 2018

3 How the Environmental Report Influenced the Drought Plan

The findings of the SEA Environmental Report (and associated Habitats Regulations Assessment and Water Framework Directive assessment) were used by Bristol Water to help inform the development of its Drought Plan. The scale and magnitude of adverse and beneficial effects identified by the SEA for each potential drought management measure were used to determine the phasing and timing of the implementation of each measure against a series of drought management triggers based on the company's combined raw water reservoir storage levels.

Measures identified by the SEA as having mostly negligible to minor adverse effects (or with material beneficial effects) were selected by Bristol Water for implementation ahead of those measures identified with more significant adverse effects which would only be implemented in more extreme drought conditions. For example, the effects of the demand management measures relating to appeals to customers for restraint in water use were assessed as having beneficial environmental effects with no adverse effects identified. Consistent with the SEA findings, this measure would be the first of the management measures to be implemented in a drought (when combined reservoir storage reaches the Zone 3 drought trigger level).

The SEA identified two minor adverse effects associated with implementation of the Temporary Use Ban and, as result, the Drought Plan states that this measure is implemented once combined reservoir storage reaches the Zone 4 drought trigger level. The Non-Essential Use Ban (NEUB) Drought Order has been assessed in the SEA as having one major adverse effect and three minor adverse effects. Therefore, the NEUB measure should only be considered for implementation in relation to non-household customers when combined reservoir storage reaches the Zone 5 drought trigger level.

The SEA identified a number of moderate adverse effects in relation the three drought permit measures included in the Drought Plan, along with a small number of moderate adverse effects relating to bringing back into use the company's Honeyhurst and Rodney Stoke (Well Head) source. As a result, the drought permits are only planned to be implemented in a severe drought if combined reservoir storage reaches the Zone 5 drought trigger level, whilst works to bring the Honeyhurst and Rodney Stoke (Well Head) source back into operation would commence at the Zone 4 drought trigger level.

The SEA identified the Emergency Drought Order as leading to some major adverse effects and therefore this measure should only be implemented as a last resort when combined reservoir storage reaches the Zone 6 drought trigger level. This corresponds to a very extreme drought situation, where reservoir storage is extremely depleted and the maintenance of water supplies to customers is at a very high risk of failure.

In addition to informing the effects of drought management measures and the sequencing of their implementation, the SEA also provides an additional information source and a comparative assessment of the environmental effects of different drought management measures for use during an actual drought event to aid decision-making. The Bristol Water Drought Management Group will use the SEA information, alongside the detailed Environmental Assessment Reports for the drought permit measures and operational considerations, to determine the precise measures to be implemented and their optimal timing.

4 Consultation and Changes Made to the Drought Plan

4.1 Consultation on the SEA

The SEA process comprised several consultation stages, as follows:

- An SEA Scoping Report was issued on 18 November 2016 to statutory consultees and opinions were sought on the proposed scope and level of detail proposed for the SEA. A five week consultation period was provided which ended on 23 December 2016.

- The SEA Environmental Report was published with the Draft Drought Plan on Bristol Water's website on 27 March 2017 for an eight-week period for public consultation. An SEA non-technical summary and HRA Screening Report (which informed the SEA) were published at the same time.

- A Statement of Response (SoR), including responses to comments made by the statutory consultees and the public on the SEA Environmental Report and the HRA Screening Report, was published on Bristol Water's website on 7 July 2017.

- The updated SEA Environmental Report and SEA Post-Adoption Statement is being published with the Final Drought Plan 2018 on Bristol Water's website. A Final HRA Screening Report is also being published at the same time.

Changes to the Drought Plan made as a result of consultation are described in the Statement of Response document. Specifically, changes to the SEA made as a result of the consultation are also summarised in Section 4.2 below.

4.2 Consultation Responses

Bristol Water published its Draft Drought Plan on 27 March 2017 for public consultation and received a number of responses during the consultation period, which ran until 21 May 2017. Bristol Water published its Statement of Response to set out how the representations were taken into account and any amendments made to the Drought Plan made as a result. **Table 4.1** lists a summary of the representations that relate to the SEA and the resulting changes made in response.

Table 4.1 Summary of Drought Plan Representations Relating to the SEA and Changes Made

Comment	From	Relates to	Comment	Bristol Water response	Changes Made
SEA01	Canal & River Trust	Various	There are numerous references to the "Canal and Rivers Trust" throughout the document. We would prefer if our correct name of "Canal & River Trust" was used.	Agree.	This has been updated in the reports.
SEA02	Natural England	Drought Permits and WFD water bodies	Proposed Drought Permits and Supply Augmentation - Natural England concurs with the conclusions of the HRA screening and SEA that the proposed drought permits are unlikely to cause any significant negative effect on any Natura 2000, Ramsar or SSSI. However, we note the potential for these proposals to adversely affect the downstream WFD water bodies that the compensatory flows would normally feed. During the 2012 review of Bristol Water's drought plan we were informed by the Environment Agency (EA) that the baseline ecological data were insufficient to judge the potential impact of stopping the compensatory flows in a drought situation. We defer to the EA's technical opinion on the potential impact of the proposed cessations in compensatory flows on the receiving WFD water bodies, though we note that an Environmental Report which provides a thorough assessment of current biological and hydrological baselines for these	The Environmental Assessment Reports for these drought permits are currently underway which will provide further information on the potential effects of the drought permits and the potential mitigation and further monitoring required. Once completed, these will be available for comment by NE and the EA.	No action required except to confirm that the Environmental Assessment Reports have been prepared and have been circulated to NE and EA.

			water bodies is not yet available. Measures to protect these river water bodies during a drought will need to be balanced with the needs of the reservoirs which are also SSSI and WFD water bodies.		
SEA03	Natural England	Honeyhurst Well	Regarding the Honeyhurst Well supply augmentation measure, based on the information presented, we concur with the conclusions of the HRA and SEA that any negative effects can be sufficiently reduced through mitigation measures. These measures will need to be considered in more detail as part of the later HRA and CROW assessments, associated with the planning and permit requirements that will be necessary prior to implementation.	Agree. The Honeyhurst measure would require HRA, WFD and CRoW Act assessments and relevant planning permissions prior to being brought into operational use.	No action required.
SEA03	Environ-ment Agency	Summary of other plans and programmes	A summary of other plans and programmes is included in the main report for ease of reading but the detailed relationship is provided in Appendix D together with how these are taken into account in the Drought Plan (DP). Key implications for the DP are included in the appendix, however the report could be strengthened by including a summary of these implications in the main report. Summary of implications is the most useful part and could be moved to main body.	Agree.	The summary of the implications for the Drought Plan has been moved to the main SEA Environmental Report in the updated version.

SEA04	Environment Agency	Section 3.2, Appendix E	The current state of the environment is summarised in Appendix E and key issues identified in Section 3.2. The future baseline sections within Appendix E would benefit from further clarification on what would happen in the absence of the DP. This would only need to be a short paragraph under each section and would provide consistency. Provide further clarity on future baseline in absence of plan.	Agree.	Further information on the evolution of baseline in the absence of the Drought Plan has been included in each section of the baseline section of the updated SEA Environmental Report - see 'Future Baseline in the Absence of the Drought Plan' sections.
SEA05	Environment Agency	Non-Technical Summary	The non-technical summary would benefit from the addition of images/tables, etc. This would help break up the text and the spatial scope of the SEA could be better explained. Provide better clarity on the spatial scope and consider using more images / tables etc. for ease of reading.	Agree.	The SEA Non-Technical Summary has been updated to include the relevant figures and tables.
SEA06	Environment Agency	Non-Technical Summary	The report states mitigation measures were considered within the assessment. The main report only gives one example. The section could be improved if Appendix F is referenced which includes further detail on mitigation measures. Reference Appendix F and an assumptions table could be included.	Agree.	The mitigation measures in Appendix F have been referenced in the updated main SEA Environmental Report and Non-Technical Summary for ease of reading. A link has also

					been provided from the SEA Environmental Report to Appendix F which sets out the mitigation measures.
SEA07	Environment Agency	Section 1.3	The spatial scope assessed in the SEA is the Bristol Supply Area, as shown in Figure 1.2. It is not clear whether any assessment extends past this boundary i.e. to reflect the natural catchment area. Clarification of the spatial scope of the previous drought plan would be helpful. In addition, the assessment of cumulative effects include trans boundary effects with other suppliers. Are these all within the Bristol Water supply area? Check spatial scope so this includes the cumulative assessment and update figure 1.2 to show this scope (not just supply area).	The spatial scope of the SEA is confined to the Bristol Water supply area. The supply-side drought measures only affect waterbodies within the boundary of the Bristol Water supply area and therefore there are no trans-boundary effects.	The spatial scope of the SEA has been further clarified in the updated SEA Environmental Report.
SEA08	Environment Agency	Appendix E	The nature and duration of potential effects have been set out in the Environmental Report, using an appraisal framework. Appendix E identifies that there are inter-relationships, but doesn't explain which ones. A matrix could be included so that the inter-relationships are clearly identified.	Agree.	A matrix of the inter-relationships between the baseline topics have been provided in Appendix E of the updated SEA Environmental Report.

SEA09	Environment Agency	Non-specific	The report references further detail in the scoping report, which is not appended to the SEA. Clarification is required on the spatial scope of the baseline, providing more detail, other than stating it was for the South West of England. Provide further clarity on spatial scope of baseline. May need to append the scoping document or summarise the main points in the Environmental Report.	The comment in Section 3.2 of the Environmental Report should actually refer to Appendix E (the detailed baseline), not the scoping report. The SEA scoping report does not contain any additional information than contained in the Environmental Report. Further clarity will be provided as to the spatial scope in the updated SEA Environmental Report.	Section 3.2 of the updated SEA Environmental Report has been amended accordingly.
SEA10	Environment Agency	Appendix A	Appendix A states that figures are presented separately - these have not been seen yet. Figures to be included.	These figures were made available for the non-redacted version provided to the EA.	None. Due to national security requirements, these figures are available for the non-redacted version of the SEA Environmental Report only.

SEA11	Historic England	Honeyhurst Well	"Honeyhurst/Rodney Stoke Well - It is possible that the associated new 4.2 KM pipeline will run through an area of significant archaeological sensitivity and mitigation may be required in advance of emergency works to re commission this source. Consequently, it may be prudent to engage Historic England Hayley.McParland@HistoricEngland.org.uk Science Advisor (South West) and local authority archaeologist to discuss this potently significant matter.	Communication has been made with Historic England regarding these comments. As assessment was undertaken by consultants (Black & Veatch) in 2009 of the proposed pipeline route. The route was assessed for the proximity to a number of designated sites and scheduled monuments. Further reference to this report will be made in the updated SEA Environmental Report. In addition, the SEA Environmental Report will acknowledge the potential risks to undesignated or unknown archaeological remains along the proposed route and that full consideration should be given to ensure harm is avoided.	The SEA Environmental Report, Appendix F has been updated as set out in the response in the preceding column.

SEA12	Historic England	Honeyhurst Well	"Groundwater sources - Where groundwater sources are to be used for the first time, re commissioned or used more frequently, it would be beneficial to consider the potential impact on the above and below ground archaeological resource, including designated and non-designated heritage assets. Paleoenvironmental archives and peat deposits are significant heritage assets, which often preserve sensitive organic archaeological remains and evidence for the context of human activity.	Communication has been made with Historic England regarding these comments. The updated SEA Environmental Report will detail the potential risk to paleoenvironmental archives and peat deposits, and confirm that further consideration should be given to ensure harm is avoided during the planning application stage. Further clarification will be provided in the SEA Environmental Report to the proximity to the groundwater to source to known peat deposits and significant heritage assets. This will identify where there is the need for further investigation and inclusion in future assessments (e.g. EIA if applicable during the planning application stage).	The SEA Environmental Report, Appendix F has been updated as set out in the response in the preceding column.

5 Mitigation and Monitoring of the Drought Plan

5.1 Overview

Consideration of mitigation measures and monitoring of potential effects has been an integral part of the SEA process. Key stages of the SEA process include Task B5: *Mitigating adverse effects*, Task B6: *Proposing measures to monitor the environmental effects of plan or programme implementation* and Stage E: *Monitoring the significant effects of the plan or programme on the environment*.). The SEA Directive also requires the significant environmental effects of implementing a plan to be monitored. The sections below describe:

- how these tasks have been addressed;
- how Bristol Water intends to ensure that the mitigation measures and monitoring plans are implemented for any adverse effects that are identified; and
- the means by which the environmental performance of the Drought Plan 2018 can be assessed.

5.1.1 Mitigation Measures

The SEA appraisals have been based on residual effects that are likely to remain after the implementation of reasonable mitigation measures (a full list of mitigation measures is provided in Appendix F of the SEA Environmental Report).

Key mitigation measures include the following:

- Adopting best practice construction methods for laying of new pipelines to avoid noise and dust nuisance (including screening to reduce noise impacts and dust suppression activities);
- Mitigation measures for fish linked to physical and visual surveys prior to implementation, and which would be ongoing throughout the duration of drought permit implementation. These measures would encompass areas most at risk from environmental stress, such as large shallow areas of the river and river reaches immediately downstream of effluent discharges.
- Other mitigation measures for fish would be agreed with the Environment Agency prior to implementation and could include the deployment of aeration equipment, undertaking a fish rescue (if considered appropriate) or temporary restoration of the normal compensation flow releases from the reservoir.
- Mitigation measures to prevent runoff of sediment to nearby streams and preventing pollution from plant and machinery
- Carrying out monitoring of sensitive environments before commencing operational changes so that appropriate protection measures can be agreed to safeguard sensitive species or features.

Certain assumptions have been made regarding mitigation, notably:

- Where suitable mitigation measures are known and identified, these have been taken into account, such that the resultant residual impact has been determined within the SEA.
- In line with recommendations made in the UKWIR SEA Guidance for Drought Plans[3], the SEA appraisals have assumed the implementation of reasonable mitigation measures, such as the use of good construction practice. This is particularly applicable to the Honeyhurst and Rodney Stoke (Well Head) supply measure where some construction work would be needed.

[3] UKWIR (2012) Strategic Environmental Assessment and Habitats Regulations Assessment of Water Resource Management Plans and Drought Plans (UKWIR Project WR/02/A).

During implementation of a specific drought management measure, appropriate monitoring will be undertaken to track any potential environmental and/or social effects which will in turn trigger deployment of suitable and practicable mitigation measures as may be available.

Bristol Water undertook further drought studies in 2017 and produced Environmental Assessment Reports (EARs) in November 2017 for the three drought permits included in Bristol Water's Drought Plan. The EARs were prepared in consultation with the Environment Agency and Natural England and in accordance with the revised Environment Agency Drought Plan Guidance 2015[4]. These EARs provide further details on the triggers for implementing the identified mitigation measures, linked to monitoring to be carried before, during and after drought permit implementation.

5.1.2 Monitoring Requirements

Monitoring is required to track the potential environmental effects of the drought management measures so as to confirm any effects that may materialise and, where applicable, to trigger deployment of mitigation measures. The SEA Directive requires that the significant environmental effects of implementing a plan are monitored. As discussed in Section 2, water companies are already required to assess the environmental effects of both supply and demand drought measures included in a Drought Plan. The Water Industry Act (WIA) and the Drought Plan Direction 2016 require that water companies include in their Drought Plan a statement of how they will monitor the effects of the drought and of any measures included in the Drought Plan (as set out in the Environmental Monitoring Plan (EMP)). This requirement is explained in the Environment Agency's drought plan guidance, which states: *An environmental monitoring plan is also needed which sets out the monitoring you've used or will use to inform your understanding of the environment that may be affected by your plan.*

As stated above, during 2017 Bristol Water prepared EARs in accordance with regulatory good practice guidance, including environmental monitoring requirements. These requirements have informed the EMP associated with the Drought Plan in relation to the drought permit measures, including hydrology, water quality, hydromorphology and aquatic ecology commensurate with the scale and magnitude of the potential adverse effects.

The Environmental Monitoring Plan involves three monitoring periods related to drought permit implementation: monitoring at the onset of environmental drought, monitoring during implementation of the drought permits and monitoring after the drought permit finishes. Monitoring is undertaken for environmental features that are identified as sensitive to the impacts of the drought permit. In addition, the EMP specifies a programme of 'baseline monitoring' to ensure an adequate baseline environmental dataset exists for those receptors likely to be impacted by drought permit implementation. Bristol Water will start to carry out the baseline monitoring in 2018 in agreement with the Environment Agency with regards to frequency, survey methodology and sites.

In addition, prior to implementation of the Honeyhurst and Rodney Stoke (Well Head) supply augmentation measure, Bristol Water will collate relevant environmental baseline data in respect of the abstraction effects on the Water Framework Directive ecological status and the pipeline construction effects to help provide the context for monitoring before, during and after implementation.

In relation to demand management measures, it is recommended that monitoring of customer impacts is carried out during and after the implementation of any demand management measures to assess their effectiveness and confirm the effects predicted in the SEA Environmental Report. This is likely to take the form of structured surveys with a statistically valid sample of household and/or non-household customers, as applicable. UK Water Industry Research (UKWIR)[5] and Environment Agency guidance[6] is available on methods for assessing the effectiveness and impact of water use restrictions on customers.

[4]Environment Agency (2016*) How to write and publish a drought plan,* December 2015. Available at https://www.gov.uk/guidance/drought-plans-environmental-assessment-and-monitoring#carry-out-an-environmental-assessment, Accessed 1 March 2016.
[5] UKWIR (2014) Understanding the Impacts of Drought Restrictions (UKWIR Project 14/WR/01/13, published 18/02/2014). .
[6] Environment Agency (2011). Monitoring the impact of water company drought measures.
Water UK (2013). Managing through drought: code of practice and guidance for water companies on water use restrictions – 2013. Available at: https://www.water.org.uk/managing-through-drought-code-practice-and-guidance-water-companies-water-use-restrictions-%E2%80%93-2013. Accessed 8th March 2018.

6 Availability of Documents

The adopted Drought Plan 2018 and accompanying SEA documentation is available on Bristol Water's website at:

http://www.bristolwater.co.uk/about-us/environment/drought/drought-plan-2018/

The documents are also available for inspection at:

Bristol Water
Bridgewater Road
Bristol
BS13 7AT

Appendix A SEA Post-Adoption Procedures

Part 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') requires Bristol Water, 'as soon as is reasonably practicable' after the adoption of the Drought Plan 2018, to:

1. Make a copy of the Drought Plan 2018 and the Environmental Report available at its principal office for inspection by the public at all reasonable times and free of charge;
2. Notify the public and potentially affected parties of their availability;
3. Inform the statutory consultees and other parties who responded;
4. Issue a statement containing:
    - How environmental considerations have been integrated into the Drought Plan;
    - How the environmental report has been taken into account;
    - How consultation responses have been taken into account;
    - The reasons for choosing the Drought Plan as adopted;
    - Measures to monitor the significant environmental effects of the Drought Plan.

Requirements 1 to 3 have been fulfilled by the publication of the Drought Plan and SEA documents on Bristol Water's website, informing all consultees of the publication and providing details of the principal office where the report can be inspected, free of charge.

The publication of this SEA Post-Adoption Statement fulfils Requirement 4.

The Gemini Building
Fermi Avenue
Harwell
Didcot
Oxfordshire
OX11 0QR
United Kingdom

t: +44 (0)1235 753000
e: enquiry@ricardo.com

ee.ricardo.com