



Department  
for Environment  
Food & Rural Affairs

Nobel House  
17 Smith Square  
London SW1P 3JR

T: 08459 335577  
helpline@defra.gsi.gov.uk  
[www.defra.gov.uk](http://www.defra.gov.uk)

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**From Richard Benyon MP**  
Minister for Natural Environment and Fisheries

Dear Chief Executive,

Discharges from combined sewer overflows (CSOs) are increasingly becoming a reputational issue for water companies in a way not dissimilar to leakage from supply a few years ago. Whilst much has been done and considerable investment made to improve the performance of CSOs their management and operation remains a regular cause for concern for both water users and the wider public. Of course we must not lose sight of the key role played by CSOs in the management of combined sewerage systems. They will continue to represent a legitimate safety valve when systems become overwhelmed by exceptional circumstances. However I would agree with many customers and communities that a water company understanding where its CSO assets are and how they are performing is a basic element of sound sewerage management.

The frequency of discharges from many CSOs, particularly those to sensitive waters such as bathing or shellfish waters, is already monitored and many more are monitored to enhance the management of sewer systems. Monitoring discharges can provide clear and consistent data to inform discussions around the performance of sewer systems with customers and other interested groups such as surfers and river users. I know that many water companies have engaged with their customers and others in these sorts of discussions and that the industry has been working with the Environment Agency on a good practice approach to monitoring and assessing frequency of discharges. Monitoring changes in the behaviour of CSOs allows potential issues to be addressed before there are adverse impacts on the environment.

Looking forward, however, I believe more needs to be done. We know that the pressure on CSOs is likely to increase. The risk of increased levels of discharge from changes in



precipitation patterns was highlighted in the Climate Change Risk Assessment. There are, of course, other possibly more immediate pressures such as population growth or increased areas of impermeable surfaces. The need for appropriate monitoring is reflected in the Drainage Strategy Framework published in May and the benefits reiterated in the National Adaptation Programme published earlier this month. Monitoring the levels of discharges also makes an important contribution to ensuring that sewerage systems are compliant with relevant legislation.

For all the reasons outlined above I believe that water companies need to introduce monitoring for the vast majority of their CSOs by 2020.

Consistency, reliability and transparency are very important in respect of CSO monitoring, not only to individual companies but to the country's collective position. Therefore we feel this is sufficiently important that we intend to include monitoring of CSOs in the water discharge permitting regime. I realise there will be many details to sort out about the best way to make this operational through permitting, for example, to ensure monitoring is appropriate to the location and suitably light touch where possible. I believe this is best achieved with Defra, Water UK, water companies and the Environment Agency working closely together to consider, for example, the best way to roll out monitoring to prioritise CSOs with environmental outcomes (including the Water Framework Directive) as well as those which have particular visibility to communities and customers, and whether monitoring CSOs which operate very infrequently is disproportionate to the risk they pose.

Increased monitoring is important but only one part of managing CSOs. Where frequency of discharge is too high or CSOs are otherwise unsatisfactory measures are needed to address them. I understand that the industry is developing a long term approach, a road map, setting out how it intends to address the challenges presented by CSOs. This may cover a range of issues but key amongst them must be how any high frequency discharges will be appropriately addressed. There are a range of possible solutions available to water companies. These are likely to have strong links to wider drainage planning allowing the most sustainable options to be identified. Each company should set out its own objectives and trajectory for dealing with high frequency CSO discharges, responding to existing monitoring data as well as that derived from the expansion of monitoring through to 2020. I think this presents a real opportunity for the industry to show clear leadership, to be ambitious and to quantify these ambitions and share them with their customers, the Government and more widely. This is likely to be an iterative process but I would welcome initial proposals from each company to be published at the same time you submit your business plans.

I believe now is a real opportunity for the water industry to build on progress it has already made, and demonstrate its commitment in the eyes of the public to tackling this issue, which is likely to grow in the next few years.

I am copying this letter to the Environment Agency and Ofwat.



**RICHARD BENYON MP**

