

Date: 12 May 2022

By email: [consultation.coordinator@defra.gov.uk](mailto:consultation.coordinator@defra.gov.uk)  
CC: [StormOverflowsPlanConsultation@defra.gov.uk](mailto:StormOverflowsPlanConsultation@defra.gov.uk)

Dear Sir/Madam

## **CONSULTATION ON THE GOVERNMENT'S STORM OVERFLOWS DISCHARGE REDUCTION PLAN**

Many thanks for the opportunity to input and comment on the Government's proposed storm overflow discharge reduction plan.

South West Water operates in a beautiful coastal region and has an important role in enhancing and protecting the environment. We take our responsibilities to the environment and the communities we serve very seriously.

Historically we have had a strong focus on coastal waters. Since 1990 we have worked tirelessly to deliver multi-billion-pound investment programmes in sewer networks, treatment works, sustainable drainage solutions, and catchment-based nature-based solutions. This has transformed our bathing water quality: we have now some of the best bathing waters in Europe, where 100% meet legal standards, with 98% rated as good or excellent, compared to 29% in 1991.

An important success story has been the effective relationships between stakeholders. Clear policy and direction from the government; effective regulation; strong partnership working; and targeted investment in our assets, data and real time monitoring has been instrumental in improving the regions bathing and coastal waters. We believe this approach can work for river quality.

An uncomfortable truth is that many issues affecting rivers and seas are largely outside the control of water companies. In the South West, 19% of rivers that do not meet good ecological status are due to water company operations according to Environment Agency data on the Reasons for Not Achieving Good Status; and less than 2% is due to storm overflows. Rivers and seas are part of a wider system, impacted by multiple pressures including population growth, urbanisation and the impact on surface water run-off, changing customer behaviours (e.g., the increased use of wet wipes), and changing weather variability. This means other parties must have a role to play in ensuring clean and plentiful rivers.

For our part, we need and we want to do more on storm discharges. That is why we have developed our WaterFit plan for the next three years, delivering our next phase of transformational environmental improvements, significantly reducing pollutions and spills from storm overflows to 2025. More on WaterFit can be found at: [www.southwestwater.co.uk/riversandseasplan](http://www.southwestwater.co.uk/riversandseasplan)

Delivery of this ambitious plan is targeting the following improvements to water quality by 2025:

- Record low levels of pollution
- 50% reduction in the average level of spills from storm overflows – to c.20 per year per location
- No more than 10 spills at bathing waters annually on average.

These outcomes will make a difference.

WaterFit is focusing on those low complexity options that can be delivered quickly to make a change. Further improvements will require significant incremental investment.

Looking forward, in the last two years, as the pandemic has changed all of our lives, we have seen a shift in the relationship we all have with nature – and increased popularity of water recreation such as surfing, paddleboarding, and swimming. So, we see the benefit of achieving better outcomes around water quality and environmental performance. But we need to recognise that the demands on catchments is increasing. In the last 15 years we have seen a 20% increase in population and 50% increase in tourism, which has increased flows into our systems by 25% - trends that we expect to continue and grow with climate change.

We do support the 2050 targets set out by Defra. However, what is clear from our assessments is that the targets require significant and ongoing investment, which will need to be funded via customer water bills over the next 25 years. We estimate the level of investment to meet these storm overflow targets set out in the region are significant, with up to £4bn of investment needed by 2050 to meet the targets, of which over c.£1bn is required by 2035, as we look to deliver investment in sewer separation, storage and UV treatment. The costs of applying UV treatment to the relevant locations is up to £300m alone. So, even with co-delivery and co-funding of investment with other parties responsible for drainage, we can expect the largest share of investment to fall on water companies and their customers.

These expenditures do not include – and have the potential to crowd out - other important investment areas such as investment in drinking water quality and water resources, reducing nutrients in continuous wastewater discharges, net zero, catchment management and nutrient neutrality, improvements in operational resilience, and mitigating the wider impacts of climate change.

The rate of change of delivering targets is an area that we need to get right. Fast targets that drive quick results increase the dependency on hard engineered solutions. A move to more collaborative working, co-funding and deployment of lower-carbon nature-based solutions drives a longer period to scope, agree, deploy and realise benefits. As the pioneer of catchment management in the sector, we know that natural based solutions are worthwhile and necessary to provide long terms sustainable solutions to storm overflows, but these take time and the targets need to be set to allow these to be used alongside traditional methods.

We would urge the existing regulatory frameworks to be reviewed, to ensure they align to the ambition in the consultation. For example, the existing Storm Overflow Assessment Framework (SOAF) processes take too long and do not facilitate the quick action and resolution we all want to have in place; and Ofwat's Outcome Delivery Incentive (ODI) framework could be considered to financially incentivise companies to invest and resolve in a more-timely manner than the current SOAF process.

Finally, the sewer system is an open system taking rainwater as well as raw sewage away from homes and businesses, preventing flooding which can have devastating impacts on people's lives and livelihoods. But this open nature of the system brings challenges, and we continue to urge Defra to take steps to help us protect this most valuable asset:

1. Action to keep rainwater out of the system. Reducing run off, ensuring responsible developer connections, and promoting sustainable drainage solutions can reduce the volumes in sewers.
2. Action to keep unflushables out of the system. It is essential there is action to address items that are devastating to the environment: wet wipes, fats and oils create huge challenges for the system, creating blockages that increase the risk of pollution and storm overflows.
3. Action to work collaboratively. Ensuring that nature-based catchment management solutions becoming a mainstream activity, encouraging everyone to work together.

I hope you find our comments helpful. Detailed responses to the questions raised in the consultation are provide in the Appendix.

If you require any further information of points of clarification, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Lisa Gahan". The signature is written in a cursive, flowing style.

**Dr Lisa Gahan**  
**Regulatory Director**

D: [REDACTED]

E: [REDACTED]

## **APPENDIX**

**Are you responding at individual / water company / charity / consumer / other?**

Water company.

**Do you know who provides you water and sewerage service?**

Not applicable.

**If yes please select which water and sewerage company**

Not applicable.

**Would you like your response to be confidential?**

No.

**If yes please give reason**

Not applicable.

**Do you agree or disagree with the level of ambition of the ecology target?**

Strongly agree.

We strongly agree there should be no adverse ecological impact resulting from storm overflow spills. In reality, spills from storm overflows are often short lived and the majority of these have no long term adverse ecological impacts.

In the South West, less than 2% of rivers that do not meet good ecological status are due to storm overflows according to Environment Agency data on the Reasons for Not Achieving Good Status. This means other parties must have a role to play in ensuring rivers in good ecological health.

A deadline of 2050 for the elimination of ecological impacts from all storm overflows appears achievable as does the target of 75% of storm overflows spilling into high priority sites by 2035.

**Do you agree or disagree with the level of ambition of the public health in designated bathing waters target?**

Agree.

We agree that for storm overflows discharging into and near designated bathing waters, water companies must significantly reduce harmful pathogens by either applying disinfection, such as with UV, or reduce the frequency of discharges to meet EA spill standards by 2035. The practicalities and costs of doing so are challenging, with the costs of applying UV treatment to locations up to £300m alone.

**Do you agree or disagree with the level of ambition of the rainfall target?**

Agree.

We agree that storm overflows should not discharge above an average of 10 rainfall events per year by 2050. We estimate the level of investment to meet these storm overflow targets set out in the region are significant, with up to £4bn of investment needed by 2050 to meet the targets, of which c.£1bn is required by 2035, as we look to deliver investment in sewer separation, storage and UV treatment.

**Do you agree that this package of targets as a whole addresses the key issues associated with storm overflows?**

Agree

We agree that the packages of measure provide a good platform for reducing the amount of spills from storm overflows but it is essential that appropriate focus is also given to other factors contributing to the operation of storm overflows. We would welcome:

1. Action to keep rainwater out of the system.
2. Action to keep unflushables out of the system.
3. Action to work collaboratively.

**If not can you explain why you do not agree?**

Not applicable.

**Would you be willing to pay more in your monthly water bill in order for water companies to tackle sewage discharges as outlined in this consultation?**

Not applicable.