

Anglian Water Storm Overflow Consultation Response

06.05.2022

1) A water company

2) Yes

3) Anglian Water

4) No

5) N/A

6) Do you agree or disagree with the level of ambition of the ecology target? [strongly agree, agree, neutral, disagree, strongly disagree, don't know/no answer]

Anglian Water agrees with this target. In March 2022 we partnered with Severn Trent to launch our Get River Positive campaign, a series of ambitious pledges to drastically improve river health in our regions. Get River Positive consists of 5 commitments, the first of which mirrors this target very closely. We have committed to:

- Ensure storm overflows and sewage treatment works do not harm rivers
- Create more opportunities for everyone to enjoy our region's rivers
- Support others to improve and care for rivers
- Enhance our rivers and create new habitats so wildlife can thrive
- Be open and transparent about our performance and our plans

With regards to the wording of the target, we are curious to understand why 'local adverse ecological impact' is being used to measure success, rather than the industry wide term: RNAGs (reason for not achieving good status) and what exactly the definition of this is. Local adverse ecological impact needs to be clearly defined so that water companies can determine how exactly to monitor for this and whether we are meeting this standard, and what we can do to improve.

Looking at the broader policy environment, we would like clarity on how this suite of targets and the target in the Environment Act to 'Reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline)' relate to each other? We would like to ensure that an agreed national target for storm overflows and river water quality are aligned in terms of goals and public messaging from all stakeholders (including water companies, EA and DEFRA). We need to have one single, joined up approach to tackle this issue which is easily communicated to the public.

7) Do you agree or disagree with the level of ambition of the public health in designated bathing waters target? [strongly agree, agree, neutral, disagree, strongly disagree, do not know/no answer]

We agree that designated bathing waters are important to the communities in which we operate, and we will support their creation. Anglian Water's Get River Positive plan sets out a commitment to support the creation of two inland bathing waters in our region. It also commits us to ensuring that 90% of the population in our region will live within an hour's drive of a bathing site in the next 10 years. We have already identified more than 20 potential inland bathing water locations and we will work with local river groups and communities to prioritise at least two for early implementation. We also will continue to promote the use of our existing inland bathing water at our Rutland Water reservoir and will look for opportunities to further increase recreational access to our reservoir sites.

However, whether we agree with this target depends on the definition of the term 'near' and whether the spill numbers are linked to individual assets or measured as a conurbation (which is currently used for CSO's and other assets close to bathing waters). The conurbation approach would be extremely difficult and expensive to implement given the complexity of combining multiple sources and would therefore be particularly challenging to deliver by 2035.

The current focus is on assets which have a proven impact to bathing waters, whereas this target appears to shift to all assets 'near' to a designated bathing water. We would like to see a target which focuses on the outcome of safe, clean inland bathing waters, rather than the number of assets or spills in proximity. We want to see investment directed towards only storm overflows which have a direct impact on the environment and public health.

We would also welcome further clarity around the definition of 'harmful' pathogens; our assumption is that this will reflect current World Health Organisation guidelines.

8) Do you agree or disagree with the level of ambition of the rainfall target? [strongly agree, agree, neutral, disagree, strongly disagree, don't know/no answer]

Anglian Water agrees with the ambition of the target, in that we support that storm overflows should only spill in exceptional weather events. However, we have significant concerns about how the target is designed to count spill numbers (input) rather than to look at environmental and river health (outcome) and do not agree that the 10 events per year would be a realistic figure if this approach was adopted.

The most extreme weather events can cause continuous rainfall for multiple days. It is possible that 5 days of rain would use all 10 rainfall events in the annual target (as they are measured as 12 hours). The target needs to be more flexible to reflect weather patterns and the likelihood that extreme weather will become more frequent due to climate change. We would like to see a smarter rainfall threshold which is set locally depending on the catchment and the weather rather than a flat rate for every catchment. We would also like to see periodic reviews of this target to ensure that it is having the required outcome for the environment.

If this target were to be implemented, we would like to better understand the target with regards to how many years is the rolling average calculated over, and how the figure of 10 spills links to better outcomes for the environment.

9) Do you agree that this package of targets as a whole addresses the key issues associated with Storm Overflows? [strongly agree, agree, neutral, disagree, strongly disagree, don't know/no answer]

10) [if not] Can you explain why you do not agree?

Anglian Water agrees with the ambition of this package of targets but have reservations about whether the design of the targets outlined will achieve the desired outcomes for the environment. We acknowledge this plan focuses only on storm overflows, but we want to reiterate that although storm overflows are amongst the reasons why rivers fall short of 'Good Ecological Status,' they only account for around 4% of these reasons nationally, and less than 1% of the reasons in the Anglian Water region. The success of any government plan to improve river health will depend on many other stakeholders, beyond just the water industry, and we await Defra's further plans to address this.

We would like to see the issue of plastics, litter and ‘unflushables’ included in this package more prominently and broadly. Anglian Water clears over 40,000 blockages every single year, caused by wrongly flushed items, such as wet wipes, cotton buds and sanitary items (as well as a build-up of fats oils and greases). Unfortunately, some of this can enter rivers when storm overflows spill due to some of these items getting through our screens. We would like to see consumer education around proper disposal of the items and specifically manufacturer responsibility to engineer more biodegradable, plastic free items.

We would also like to see an increased focus on developers and the design of new developments considered in this package, including the automatic right to connect to water company systems. In addition, new homes and extensions to existing homes are often connected incorrectly where the surface water is connected to foul water pipes, when they should be built with separate systems. Having a separate system prevents the foul water pipes from being overwhelmed by rainwater and allows rainwater to go into rivers without the combination of sewage. Additionally, we would like to see sustainable drainage systems (SuDS) be included in the design of all new developments. This would enable more water retention and less immediate run off into the sewage network, reducing the likelihood of storm overflows.

As has been said above, Anglian Water would like this suite of targets and the target in the Environment Act to ‘Reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline)’ to be coherent and compatible with each other. We would like to ensure whatever the agreed national target for storm overflows and river water quality is, that all organisations (including water companies, EA, and DEFRA) are aligned in our goals and public messaging. We need to have one single, joined up approach to tackle this issue which is easily communicated to the public.

11) 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? [Yes/No/Don't know/ N/A]

The Storm Overflows Taskforce for England conducted research to understand public perceptions on river water quality and CSOs in May 2021¹. Anglian Water agree with this report in saying that ‘it is essential that the views and best interests of all consumers in England and Wales are taken into consideration’. The research showed that when shown a list of environmental issues that affect the UK, and asked to pick their top three, people are most concerned about: micro plastics in the environment (59%); air pollution (53%); and flooding from rivers and the sea (46%). River pollution from sewage (40%) comes fourth. It goes on to say that in principle, 58% of people surveyed would pay more on their water bill to support investment to reduce the need to use storm overflows, subject to the detail and cost. 31% would not be prepared to pay more.

Anglian Water carried out ‘State of the Nation’ public research, and when asked what water companies’ priorities should be, given current concerns (as an open-ended question) 11% said a water company priority should be no raw sewage discharged into rivers or seas.

Our investment programme between 2020 to 2025 is our largest ever, totaling almost £6 billion, £800 million of which is specifically directed at environmental improvements, including investigating, and remediating high spilling storm overflows. Our priority is to achieve excellent quality and event monitoring data, which will help us to target our investment to where it is needed most, therefore

¹ <https://www.ccwater.org.uk/wp-content/uploads/2022/04/Awareness-and-perceptions-of-river-water-quality.pdf>

providing the best outcome for the environment and the best use of customer money. We publish our EDM data annually on our website (<https://www.anglianwater.co.uk/services/sewers-and-drains/combined-sewer-overflows/>) and share it with the Environment Agency and the Rivers Trust. The Rivers Trust also publish a map of all the locations on their website (<https://www.riverstrust.org/key-issues/sewage-in-rivers>).