

From the Chief Executive

Cllr Jenny Ceresa
Chairman
East Suffolk Council
Riverside
4 Canning Road
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By email to Paul.Mackie@eastsuffolk.gov.uk

27th January 2023

Dear Councillor Ceresa

Re: Response to the Secretary of State on Anglian Water's action on sewage discharges

Thank you for your letter of 13th January about the motion that East Suffolk Council passed on 23rd November 2022 regarding sewage pollution and water quality. I have also noted the recent article in the East Anglian Daily Times about concerns raised by Councillor Peter Byatt.

Protecting, restoring and improving our region's environment is at the heart of our business, and we take this responsibility incredibly seriously. As you mention, we share many common priorities and areas of concern with East Suffolk Council. We are keen to work closely with the Council on these and would welcome the opportunity to meet to discuss the issues you have raised and how we can work together with the Council and other partners to deliver real progress in these areas.

We would also be very happy to organise a visit for Councillors to one of our water recycling sites to talk them through the process, and see the challenges we face and the steps we are taking to improve the monitoring of storm overflows and reduce sewage discharges and their impact on the environment.

I have set out below our response to each of the issues raised by the Council.

1. Improving water quality checks to protect our rivers and coastline from pollution

Water quality checks are the responsibility of the Environment Agency (EA) who control the amount of water we take from the environment and monitor the quality of the water we return. We do, however, work closely with the EA and also monitor carefully our own discharges.

Across our network, 75% of our storm overflows are fitted with an Event Duration Monitor (EDM) which tell us if, and for how long, they discharge for. This enables us to identify storm overflows which are spilling too frequently, and we then invest accordingly to protect the environment. By the end of 2023 we will have fitted all storm overflows with an EDM. Further details about storm overflows are included in response to issue 2 below.

We are also installing an extra 22,000 sewer monitors throughout our region. This ambitious project will be delivered by the end of 2025 and the data from these monitors, along with investment in EDMs, will tell us more about how our network responds to changes in the weather, where there is an increased risk and where we need to invest.

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In addition, from January to May every year we undertake a service programme whereby all of our coastal sewage pumping infrastructure receives a service to minimise the risk of breakdown and pollution occurring during the bathing season. As part of this programme of work, jetting and tankering takes place to reduce the risk of 'fatbergs' building up in our network. We would very much welcome the opportunity to work with the Council to encourage residents and businesses not to put unflushables such as wipes, fats, oils and grease down their drains.

2. Action to address sewage discharges

Our permanent treated discharges from water recycling centres are all issued with permits, and our performance is carefully monitored by the EA.

Our Water Industry National Environment Programme (WINEP), an investment of over £800 million between 2025-25, is specifically targeted at protecting the environment and improving river water quality. Our WINEP is the largest environmental investment plan of any water company, with double the number of commitments made and delivered in the previous five-year period.

Part of that investment includes £220 million on schemes that will reduce storm spills. These include:

- £21.5 million on improvements to bathing water quality. Many of these solutions do this by reducing spills from sea outfalls
- £23 million on increased monitoring of total number of spills, to improve information and visibility to the public and inform future investment where it will have the most environmental benefit
- £56 million to increase capacity, and therefore the amount of water treated at Water Recycling Centres, reducing the risk of spills to the environment
- £80 million to install more storm tanks at Water Recycling Centres
- More than £20 million to directly reduce spills at high spilling storm overflows to protect the environment, and to increase monitoring at those at risk of causing pollutions during heavy rainfall
- £20 million on sustainable drainage solutions to reduce the risk of flooding and storm overflow spills

In 2022 we joined together with Severn Trent Water to form the [Get River Positive partnership](#), which comprises five key commitments to safeguard and improve river health in both companies' regions. One of those commitments is to ensure that storm overflows and sewage treatment works do not harm rivers, with the aim of:

- eliminating all serious pollutions by 2025
- reducing less serious pollutions by 45%
- reducing spills from storm overflows to an average of 20 per year by 2025.

Most of our sewers are 'combined sewers'. This is usually one single pipe that collects rainwater that runs off gutters, drains and roads as well as the wastewater from homes and businesses. This wastewater is taken to our treatment works, where it is cleaned and treated before being returned to a nearby watercourse or the sea.

If it rains heavily, our sewers can become inundated with far more water than they were designed to cope with. As the Council will know, as part of their design, the sewers have safety release valves known as storm overflows, which take pressure off the system by releasing the excess water into rivers and the sea. Storm overflows protect homes and businesses from flooding because otherwise the system would back through toilets, drains and manholes. Because they operate after heavy rainfall, we know the vast majority of what comes out of storm overflows is rainwater.

Sewers have not been built like this for decades, and each of our storm overflows is subject to a permit issued by the EA. As mentioned above, three-quarters of our storm overflows are fitted with an EDM and by the end of this year we will have fitted all storm overflows with an EDM.

We publish details of the locations of our storm overflows and our EDM data on our website:

<https://www.anglianwater.co.uk/services/sewers-and-drains/storm-overflows/>

This information is also available on an interactive map, which includes details on investment schemes to improve the local environment and river health:

<https://www.anglianwater.co.uk/services/sewers-and-drains/storm-overflows/improving-rivers-and-coastlines/>

We also use our Storm Overflow Assessment Framework (SOAF), which we developed with the EA, to survey and assess the impact of our highest spilling storm overflows and invest where we find evidence of impact.

In terms of the designated East Suffolk bathing waters, both of these at Felixstowe are classified as 'Excellent' (Blue Flag standard).

Lowestoft North beach is also classified as 'Excellent' and Lowestoft South is a 'Good' beach and close to meeting the Excellent standard as well. Last year we closed off three storm overflows that used to discharge to Lowestoft Outer Harbour. This will help increase the chances of both Lowestoft beaches reaching the Excellent water quality standard.

Further innovative measures to address sewage discharges include the 'PFA disinfection plant' that we have introduced at our Southwold Water Recycling Centre. East Suffolk is the first district in the UK to have such a facility and we are trialling this technology as an energy efficient, low carbon means of treating bacteria in the final effluent discharged to the River Blyth.

Since the plant has been in place, water quality at the Southwold Denes beach has improved and it will be classified as an Excellent beach for the first time in 2023. It will join the Southwold Pier beach which is already classified Excellent.

3. Ensuring that outfalls are equipped with operationally functioning Event Monitors or other sensors that are checked and maintained regularly

As mentioned above, we will have installed Event Duration Monitors (EDMs) on all of our storm overflows by the end of this year. In addition, the extra 22,000 sewer monitors that we are installing across the network will help improve our visibility of the system and assist decision making in terms of where to prioritise investment.

We ensure that EDMs and monitors are maintained regularly. In addition, as many of the monitors are, by their nature, located in volatile settings, we spend time assessing the data following an activation alert to determine if a spill has occurred. We also use information gathered during these investigations to understand the cause of false spill events generated by external factors such as unflushables being put into sewers. Roughly one third of events which are recorded as spills are found to be false spills (activations) following investigation.

4. Actions to reduce surface water run-off overwhelming the Combined Sewer System

As explained above, we monitor our network very carefully and our investment in EDMs and sewer monitors will help to improve our understanding of our systems even further.

We have a comprehensive asset maintenance programme, where we inspect, clean, repair and replace many kilometres of sewer pipes every year on a priority needs basis. This programme includes fixing broken sewers to reduce ground and surface water infiltration.

There are, however, many other reasons for surface water run-off entering our systems across the UK sewer network. Other causes include agricultural run-off, highways run-off, urban development, blockages and misconnections. We have, for example, undertaken a number of village and town surveys which have found that up to 25% of properties have surface water connections into the foul network.

We work with partners, in particular the Lead Local Flood Authority, local Rivers Trusts, farmers, landowners and highways authorities to mitigate these causes and would welcome the opportunity to work more closely with East Suffolk Council on this.

We also welcome the Government's recent announcement that it will be consulting this year about the implementation of Schedule 3 of the Flood and Water Management Act which will remove the automatic right to connect to the sewer network and further promote sustainable development with sustainable drainage solutions.

5. Investments planned over the next AMP period to address the needs of the District's growing population and to support the delivery of associated growth on new developments allocated in the Local Plans

We support Councils in developing their evidence base on water, water recycling and flooding to guide development in Local Plans. Our renewed focus is on signposting assessment and investment set out in the draft Drainage and Wastewater Management Plan (DWMP) and draft Water Resources Management Plan (WRMP). Our two Plans are based on Councils' growth plans set out in adopted Local Plans and on the past trend of business growth across 18 sectors.

We also work closely with Essex and Suffolk Water through the Water Resources East Regional Plan. In addition, we are seeking to develop a joint position statement with the Environment Agency and Natural England to support more ambitious water efficiency standards in Local Plans and this is something we have raised through the Suffolk Growth Board Water Forum, which is attended by representatives from Anglian Water and Essex & Suffolk Water.

We don't have exact locations for investments during the next AMP period (2025 – 2030) yet as we work on an adaptive programme of work to ensure we invest in the right places at the right time. We have, however, reviewed all of our catchments as part of the Drainage and Wastewater Management Plan and identified where we feel we are likely to need to undertake some work within the medium term (AMP8 and AMP9).

Our draft DWMP is published here [Drainage and wastewater management plan \(anglianwater.co.uk\)](https://www.anglianwater.co.uk), and our final DWMP will be published in May. We will then continue to monitor growth and promote investment as required.

I should also highlight the £400 million investment we are making in installing the Anglian Water Strategic Pipeline which will be complete by the end of 2025 and will enable a step change in water supply resilience by connecting water resources in Lincolnshire with water stressed areas of Suffolk and Essex. Longer term, two new reservoirs are also planned in Lincolnshire and the Cambridgeshire Fens to increase supply options by the late-2030s.

We would welcome future engagement when the Council seeks to review its Local Plans and to bring forward a new Local Plan for East Suffolk. We are, in particular, keen to work with the Council to address the scarce water resources in Suffolk and reduce the amount of water required by new development.

I hope this response underlines our commitment to protect, restore and improve our region's environment and we look forward to working more closely with East Suffolk Council on this. As I have

mentioned, we would be very happy to meet to discuss the issues outlined above in more detail and the next steps in what I hope will be a successful partnership.

Yours sincerely

A handwritten signature in blue ink that reads "Peter Simpson". The signature is written in a cursive style with a period at the end.

Peter Simpson