

Storm overflows consultation response- Respondent 2 (15/05/23)

I write, not as a member of any "campaign group" but as a member of the general public in response to your consultation invitation dated 9 May 2023 about the a/m topic (attached), but I fail to understand why you should believe that only the former should be representing the public at large, especially when so many of such groups are clearly partly politically motivated.

In my case, I live beside the River Arun in Arundel, West Sussex, and I am concerned about the enormous number and duration of CSO spills that take place each year into the Rivers Arun and Western Rother in the Arun & Western Streams Catchment in this area of the country serviced by Southern Water Ltd. The local problem involves polluted water from Horsham to the north and Petersfield to the west, all of which flows via the internationally important environmental sites located alongside the River Arun just to the south of Pulborough on its way to the coast at Littlehampton.

I am therefore keen to see the number and duration of such spills reduced as soon as possible, and thus welcome your increased interest in making this happen. I would also add that during my working life I was involved with the design and successful operation of management information systems starting as far back as the mid-1960s.

As far as I can tell from your somewhat confusing (multi-topic) consultation document, you seem to be seeking a single, mythical, figure which will give you an effective indication of water company performance in relation to CSO spills, but you have muddied the picture by including links to pollution incidents, unmonitored overflows, unserviceable monitors and emergency overflows. As a result, in my view and experience, you seem (as they say) to be "mixing apples with oranges", which will produce a number that will tend to add confusion to the topic.

I therefore offer the following comments:

- a. In respect of CSO spills, the vast majority of which are authorised by the Environment Agency, your proposal for an "overall measure" seems to be reasonable, although I would also prefer to see some linked measure which highlights those few specific CSOs which have the very highest number of spills and the longest duration of such spills in any given year.
- b. You already seem to have an effective system for highlighting (unauthorised) pollution incidents, which have their own performance commitments, and these should therefore not be amalgamated with CSO spills.
- c. In respect of the installation of event duration monitors, there is already a requirement to fit these to all CSOs. This should therefore be a stand-alone performance commitment, and should not be combined with the CSO spill commitment. The concept of making an "unmonitored overflows adjustment" to the

CSO spill performance measure should be discarded. This is simply a statistical "trick" which will tend to confuse rather than clarify the situation.

d. In respect of the unserviceability of event duration monitors, there should be a separate performance commitment, especially in view of the current poor performance figures highlighted.. This situation should not be allowed to continue without an annual stand-alone performance measure / commitment.

e. In respect to your proposal concerning "mid-period changes", you already say that you "expect relatively few closures prior to 2030", and I therefore suggest that you should leave this aspect for consideration into the run-up period prior to PR25.

f. As far as "Emergency Overflows" are concerned, I am under the impression that these are covered by the extant Pollution Incident control system which already has its own performance targets separate from the CSO spill control system. This is certainly so in respect of Southern Water Ltd, which has what it calls its Pollution Incident Reduction Plan (PIRP) about which it produces annual reports, and which seems to be an excellent way of managing the problems relating to PIs. If Emergency Overflows are the same as PIs, why is there a need for a new reporting requirement? Or is the SW PIRP control system unique and thus needs to be introduced across the industry?

Q1: Do you agree with our proposals to set a performance commitment based on average spills, with financial consequences for companies that do not meet their targets?

Yes. But I would also wish to see the very worst CSO spill sites highlighted somehow.

Q2: Do you agree with our proposed approach to unmonitored storm overflows?

No. This is where you are mixing apples with oranges.

Q3: Do you agree with our proposed approach to mid-period changes?

Unnecessary until PR25.

Q4: Do you agree with our proposed approach to emergency overflows?

Unsure. If the same as PIs, then simply extend the excellent SW control system across the industry. Otherwise, more explanation is needed before you invent a new control metric.

Q5: Do you have any further comments on this performance commitment?

Yes. For goodness sake "keep it simple" and thus understandable.