

**Storm overflows consultation response- Martin Osborne (Hemdean Consulting)**  
**(09/05/23)**

**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.

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

The approach needs to recognise that breakdown on monitoring equipment is inevitable. Either the assumed number of spills for unmonitored periods needs to be reduced or there needs to be a grace period for carrying out repairs before the high level of assumed spills is applied.

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

Yes.

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

Yes.

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

There will be a move towards limits on total duration of spill or total volume of spill. The UWWTD now includes a requirement to spill no more than 1% of flow and load through overflows.

- The UK no longer needs to comply with the UWWTD but may wish to in order to comply with the level playing field.
- Monitoring or modelling to accurately demonstrate compliance with the 1% flow and load rule is almost impossible.

However an easy to implement performance measure to show movement in this direction would be to record the number of overflows that spill for more than 1% of the year. Although this might not have an ODI in the immediate future it would be useful to start gathering baseline data on this potential future measure.