Questions for South West Water (SWW) for East Devon DC Scrutiny Committee 1/2/24

1) In 2023 there were ten non-permitted spills from SWW assets that affected East Devon Bathing Waters. Communication from SWW is highly inconsistent, with an apparent reliance on the Environment Agency (EA) to notify Environmental Health Colleagues due to shellfish beds. The notifications to the EA are often hours after the original incident and do not take into account the Council's beach management function. Why is communication from SWW so inconsistent and how can you ensure you alert our beach safety officer immediately when there is a non-permitted spill affecting one of our bathing waters, rivers, or beaches?

   SWW is aware that the Environment Agency issued 10 PIRT's (Pollution Incident Report Tool) for East Devon beaches between 4 July 2023 and 20 December 2023. As these PIRTs have been issued by the Environment Agency, it would be appropriate to ask them about their reporting process.

   We do hold a BeachWise Forum every year to discuss partnership working and communications with beach manager /owners and Local Authority representatives. SWW would welcome a conversation with EDDC to explore this in more detail.

2) It was particularly disappointing to read in the media in reference to the spill on the 5th and 6th of January 2024 at Exmouth, that SWW were saying that advising the public of spills was the responsibility of beach managers. SWW had not notified EDDC that a second pipe burst had taken place or to work together to manage this issue. Why were we not informed of this occurrence?

   A separate response will be provided to this question.

3) When there was a manhole 'blow off' and discharge at the Hamm, Sidmouth on 4/12/23, it was reported to the EA as being 'minor with no significant release of effluent'. However, the entire river walk some 100m long was full to knee deep with discharge? Please can you clarify SWW definitions of the levels of discharge.

   SWW received a customer report on 4 December 2023 at 13.14 of surcharging manholes. Our operative attended site at 14.24 and found no manholes discharging. Photographs taken were at the time of the attendance and we provided this feedback to the Environment Agency.

4) Have the uprated pumps installed in Exmouth resulted in more breaches/bursts (due to increased flow rates)? Is this an issue you recognise and is it related to aging infrastructure? If so what specifically are you doing about it?

   A separate response will be provided to this question.

5) Is the combined system at its capacity? If not, why are we seeing more spills (consented and unconsented) and what are you doing about this specifically?

   The combined sewer is not at capacity.

6) In the Water fit document you say that you are working towards no more than 20 permitted discharges per bathing water per year. In 2022 you claimed that good progress had been made in this regard. Why in 2023 was this progress lost? For example, Exmouth had 40 discharges in 2023 vs 19 in 2022. Was this related to 2023 being a 'wetter' year and if so are you reviewing your conclusion that progress is 'being made' as it seems reliant on the weather?

SWW remain committed to achieve the ambition we have set out in our WaterFit Strategy.

7) Why have all EDDC bathing waters exceeded the 'no more than 20 permitted discharges' target in 2023 (Sandy Bay 21, Exmouth 40, Budleigh 44, Sidmouth 28, Beer 32, Seaton 31). What specifically are you doing to reduce discharges at our beaches going forward? Will SWW be subject to any punitive measures for breaching this target?

SWW remain committed to reduce spills as outlined in our WaterFit Strategy. Information related to these beaches is provided on our WaterFit pages.

8) In regard of the updates issued by Beach Live/Water Fit what does it actually mean when an Event Duration Monitoring (EDM) sensor is put in maintenance status? Given that many of these occur during the hours of darkness and high tide making it clear no actual maintenance is occurring?

The SWW Control Centre can access EDM data 24/7, 365 days a year. We may put EDMs into maintenance for a number of reasons including: to clean / maintain the EDM, faults with the sensor, communication issues i.e. with the BT network, where we believe the EDM is incorrectly measuring activations due to wet wipes or other foreign material effecting the operation of the EDM.

SWW are required by the Environment Agency to achieve >90% operability for all EDMs. Where this is not the case, we have to provide these reasons in our EDM Annual Return. The Annual Return is required to be submitted to the Environment Agency by 28 February 2024.

SWW plan to publish the 2023 Storm Overflow Annual Return on our website by 31 March 2024. Link here for 2022 Annual Return: storm-overflows-edm-monitoring-annual-report-2022.pdf (southwestwater.co.uk) The Environment Agency also publish all water company EDM data on gov.uk. Link here for gov.uk website: Environment Agency publishes Event Duration Monitoring data for 2022 - GOV.UK (www.gov.uk)

9) SWW state that the discharges from combined sewer outfalls are not sewage but 'storm water'. Given that the any discharge from a sewer is by definition 'sewage' how do you justify this? Whilst the overflow may be due to storm water, it is mixed with sewage and will pick up contaminants from this.

The majority of our storm overflows operate due to excess water in the network and occur when the permitted pumping capacity has been exceeded. This can come from a variety of sources including: surface water connections from development / large buildings, land drains connected direct in the network, ground water infiltration which are primarily as a result of heavy rainfall. In some circumstances blockages do occur due to wet wipes and/or fats, oils and greases which cause sewage to back up and discharge via a storm overflow. We are installing c. 20,000 sewer level monitors to help us better understand how our gravity sewers operate to give us an early warning. We are also working with Food Service Establishments (FSAs) in areas where we have a history of sewer blockages and/or sewer flooding. If we find FSAs haven't put in appropriate measure to stop FOG entering the sewer we can take enforcement action.

10) Can you explain why there have been spikes in E. Coli and Enterococci bacterial load at Exmouth following these 'discharges of storm water' ? data here Open WIMS data

E.coli and Enterococci can be derived form a number of source not just human.

This is Environment Agency data which they are collecting at a number of locations outside of the bathing season. SWW had asked the Environment Agency to include Exmouth Beach in their programme of additional monitoring. SWW can confirm that following a conversation with the EA, it is the EA's intention

to complete the sampling then to review the data along with other information e.g. catchment information, rainfall, hydrological data along with data provided by South West Water in order to characterise the bathing beach water quality. The EA are also collecting information on bathing beach use as part of their sampling programme and determining if it is feasible to collect samples safely during the winter period. All samples are taken in accordance with the bathing water sampling protocol.

11) We are concerned that SWW do not raise concerns with planning applications which will clearly add to wastewater flows within a network which clearly cannot cope. In relation to this:

    a. From previous Scrutiny meetings we understand that there are 12 SWW officers commenting on planning applications that affect SWW assets. What is the process for deciding which applications to comment on?
    b. How does SWW consider the cumulative effect of separate applications on the sewerage system?
    c. How does SWW take this information and plan for infrastructure improvements and capacity building?
    d. What are your plans to stop spills and ensure there is capacity in the network for future property growth?

    Please note: Our Planning Committee have previously asked for information from SWW on connections capacity and network upgrades with no response.

    Please can you provide a copy of your information request. SWW will then be able to review and respond accordingly.

    SWW wrote to all Planning Authorities in December 2023 following concerns raised regarding the planning process and engagement between Planning Authorities and SWW. A copy of this letter to East Devon District Council is attached. We have yet to receive a reply from EDDC and hence would welcome a conversation as offered in our letter to you. Your contact to arrange this is provided in our letter.

    SWW have produced a Storm Overflow Action Plan which sets out our approach to reduce the activation of storm overflows between now and 2040. This was in response to the Secretary of States request to reduce storm overflow activations. We have listened to our customers and stakeholders and they have said they would like us to focus and bathing waters and shellfish waters in the first instance. Each storm overflow that requires action will have a defined period for completion. We will share this when the SoS has given permission for all water companies to publish their plans.

12) There were over 4000 tanker movements in Exmouth in 2023. Why are you tankering Sludge from Kilmington STW to Maer Lane STW Exmouth, rather than to the STW at Countess Weir which has significantly better road access?

    This question was raised at a recent Exmouth online community meeting held on 11 January 2024. A Q&A pack is being produced following this meeting which we can forward on to EDDC when it is available.