

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Ansawdd dŵr a gollyngiadau carthion / Water quality and sewage discharges
WQSD 02
Ymateb gan Hafren Dyfrdwy / Evidence from Hafren Dyfrdwy

RHAGOROL O'R TAP
WONDERFUL ON TAP



severn dee

Packsaddle
Wrexham Road
Wrexham
LL14 4EH

hdcymru.co.uk

Dear Committee,

Re: Water quality and sewage discharges: Invitation to give evidence to the Climate Change, Environment and Infrastructure Committee

We are grateful for the opportunity to provide evidence to the committee's inquiry into river water quality on 3rd February 2022.

Hafren Dyfrdwy serves around 108,000 customers in Mid and North-East Wales, including over 20,000 waste wastewater customers across Powys and Montgomeryshire. We are responsible for a total of 50 sewage treatment works and 50 storm overflows, all of which are monitored electronically and are fully in line with requirements. Further, we have committed to eliminating all harm our operations may cause rivers by 2030, as well as contributing positively to the environment by being Net Zero by the same date. Hafren Dyfrdwy is part of the Severn Trent Group, we offer our customers the lowest bills in Wales and England at less than £1/day.

The main points we wish to make to the committee are:

1. During the period 2020-25 Hafren Dyfrdwy's total investment on waste and environmental improvements will be nearly £17m, significant for a business of our size, equating to £200 investment per connected property. This includes £7.6m spent on improving 46km of river, including investment in flow to full treatment ('FFT') and event duration monitors (EDM) and £3.3m on waste network and treatment works enhancements, including investigations and storm overflow improvements, and compliance and pumping station maintenance
2. The latest data from Natural Resources Wales (NRW) shows that 40 percent of water bodies in Wales are at Good or better status. (The WFD only awards Good status if all 60 or so chemical, biological and physical sub-measures are at Good; in Wales 93 percent of these sub-measures achieve Good or better status.)

3. The key question is: what is stopping all rivers in Wales achieve Good status? The data from NRW (Dec 2020) shows the main causes are:

- agricultural pollution accounts for 21 percent of the reasons for failure,
- the water sector accounts for 15 percent,
- mining operations account for 14 percent,
- urban land and transport networks account for 12 percent.

(Note: in the **HD waste area, just seven percent of Reasons for Not Achieving Good Status (RNAGS) are attributable to water company operations**, and we have action already underway to reduce this to 3.5 percent)

4. There has been much focus on combined sewer overflow (CSO) spills, all sewer and sewage treatment works infrastructure has a finite capacity. Storm overflows act as 'pressure release valves' to prevent flooding of homes and businesses during wet weather through permitted discharges. The frequency of discharges from storm overflows are a function of a number of macro factors;

- Climate Change – extreme rainfall events are 30% more likely in the next decade (intensity and duration), February 2020 was the wettest on record
- Urban Creep - Big increase of impermeable areas in urban areas, in 2015 one in four front gardens had been paved over.
- New and Mis/illegal connections – Surface water from home extensions, new builds, land and highways drainage

5. The diagnosis clearly shows that water companies have action to take, but unless the issue of agricultural pollution is also addressed, health of rivers in Wales are unlikely to improve materially. The main measures we would like to see actioned are:

1. Ensuring compliance with existing environmental standards, especially for landowners receiving public subsidies.
2. Promoting low input and regenerative farming: the problem is not farming; it is intense, unsustainable farming.
3. Restoring soil health by rebuilding soil organic matter and increasing soil biology.
4. Rolling out appropriately designed and placed nature-based 'river protection strips'.
5. Encouraging the placing of livestock fencing (in conjunction with river protection strips) between farmed land and streams and rivers.

6. Furthermore, improved management of surface water drainage from highways and developments will reduce pollution run off from these areas but also reduce the burden on the combined sewer system and lead to reduced propensity for spills. Removing the automatic right to connect surface water drainage to the sewer network and legislative changes to further incentivise the use of green/blue infrastructure solutions for surface water management are potential opportunities.
7. The committee will be aware of the work that has been undertaken between Natural Resources Wales, Welsh Government, OFWAT, Consumer Council for Water, Afonydd Cymru, DCWW and Hafren Dyfrdwy.

The subsequent storm overflow roadmap forms part of a wider ambition to achieve longer term sustainable improvements to river water quality. The taskforce will be making a number of recommendations focused on; reducing visual impact, environmental regulation, network capacity, improved monitoring and stakeholder and customer engagement. We are developing a programme which augments our current plans and delivers against these recommendations, there are some other considerations.

- The principal measure by which water companies should be judged by is harm their operations cause rivers, as measured by Reasons for Not Achieving Good Status (RNAGS). To achieve the right result, it is necessary to be guided by the right measures, and that is ultimately a measure of any harm caused.
- The Welsh Government could set a national target to eliminate all harm to rivers caused by water companies by 2030 (measured by Reasons for Not Achieving Good Status, or RNAGS).
- The Welsh Government could determine strategic guidance to set potential targets for the progressive reduction in use of storm overflows, prioritising the reduction of use in environmentally sensitive areas.
- Subsequent investment needs by water companies – supported by regulators – should explore Nature Based Solutions (NBS) as their first choice to address environmental challenges. The burden of proof should effectively be reversed to requiring an explanation of why a NBS is not appropriate.
- Water companies enhance their customer engagement programmes to help customers to help themselves. Sewer blockages very often cause spills to the environment – and it is estimated that 70 percent of sewer blockages are caused by inappropriate flushing away of wet wipes, fat and other materials. Customer education programmes about what they can and cannot flush away, help customers to help themselves.

RHAGOROL O'R TAP
WONDERFUL ON TAP



severn dee

- Working in partnership. Tackling water management issues with local community groups, local authorities, local business and individuals ensuring land and water management actions are integrated.

We look forward to discussing these and other issues with the committee on 3 February.

Kind regards

A handwritten signature in black ink, appearing to read 'J. Jesic', written in a cursive style.

James Jesic
Managing Director