

Wastewater WINEP

Addendum to SRN40 WINEP

– Storm Overflows

Enhancement Business

Case

28 February 2024
Version 1.0



from
Southern
Water 

1. Introduction

We have prepared this addendum to SRN40 Storm Overflows Enhancement Business Case in response to Ofwat’s query OFW-OBQ-SRN-205 (Query 205). It describes changes proposed to our WINEP in the light of discussions between Southern Water, Defra, the Environment Agency and Ofwat with respect to the scope of a WINEP which meets the latest understanding of statutory requirements. This is an interpretation of requirements and reflects the discussions through a series of meetings with regulators in December 2023 and January 2024. We refer to this as the “February 2024 draft WINEP” in this addendum. It is not the final signed-off WINEP as this is yet to be agreed with the regulators and there remains a high degree of uncertainty on the final scope of activity that could be phased into AMP9.

This document should be read in conjunction with the submitted October 2023 version of the enhancement business case which describes the comprehensive process we have carried out to appraise a range of options and develop efficiently costed solutions. Such processes are no different between the scope of the business plan submission and the scope of this February 2024 draft WINEP.

All costs provided in this document are in 2022/23 CPIH financial year average prices.

2. Summary of Programme Changes

Our Pathfinder programme started in 2022 to test more innovative approaches to reduce the number of spills in 5 pilot areas. This was in recognition that standard approaches are not always effective, incur very high costs and are not resilient to the more extreme weather we are experiencing. These pilot areas have been used to inform and develop cost effective solutions used in the development of our Storm Overflow programme.

Ideally, delivery of storm overflow reductions should be phased over 7 years, as illustrated in Figure 1 below.

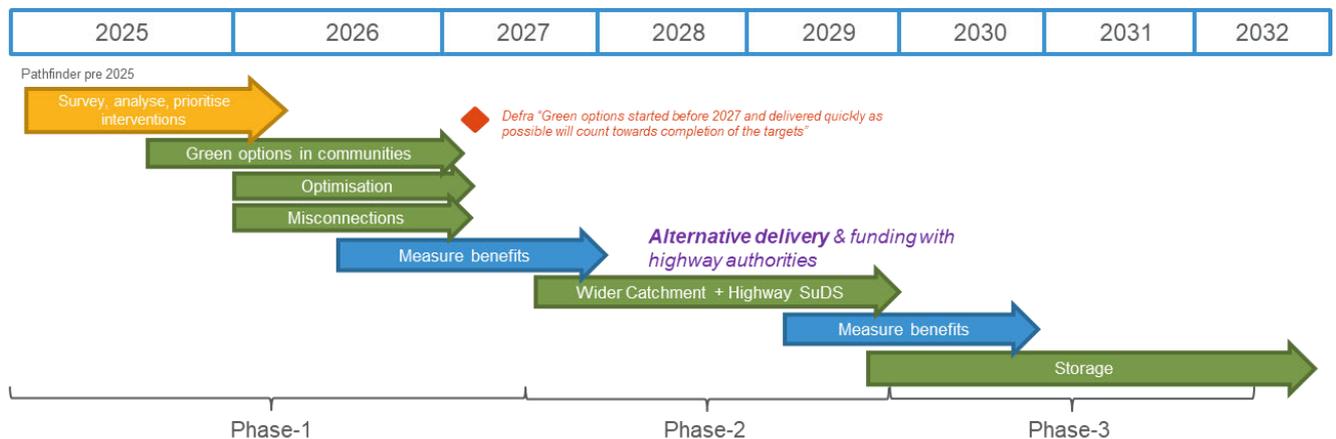


Figure 1: Recommended delivery phasing

This 7 year phasing approach was the basis of our PR24 submission in October 2023, with costs spread over AMP8 and AMP9, but mostly in AMP8 with schemes finishing in the first half of AMP9. Our storm overflows programme was reviewed in joint meetings with Defra, EA and Ofwat in January 2024, with more detailed technical engagement directly with EA. This has resulted in significant changes to our proposed programme of work in terms of phasing, but also includes additional overflows added to the AMP8 plan at the request of the EA for this February 2024 draft WINEP.

Changes to our Storm Overflow programme are summarised in table 1. The table is split into four categories, based on the regulatory completion date and reasons for their inclusion. The four groups are explained below:

- Water Framework Directive – No deterioration (SW_ND, BW_ND). The WFD overflows are a high priority for the EA, with 2027 delivery dates for activities preventing deterioration of shellfish and bathing waters.
- Priority waters – including shellfish improvements (EnvAct_IMP2). These are based on studies that have identified ecological harm and where overflows have been identified as the ‘Reason for Not Achieving Good’ ecological status. In our region, this is 3% of the waterbodies.
- Non priority waters and overflows that are priorities for our customers. Applying the February 2024 draft WINEP we would propose to start investing at these locations late in AMP8 and complete them towards the end of AMP9.
- The final group, EnvAct_INV4 are the studies that need to be completed by 2027. This includes 303 investigations, although an additional year may be needed to deliver all of the investigations due to potential supply chain constraints around delivering so many concurrent investigations. The outcome of these investigations could affect several sites where improvement is planned for AMP9.

Table 1 Summary of changes to October 2023 submission for storm overflows (£m)

Category	Reg Date	October 2023 business plan			February 2024 draft WINEP		
		No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)	No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)
Bathing Water – No Deterioration	2027	1	£2	£2	1	£4	£0
Shellfish – No Deterioration	2027	14	£86	£39	14	£108	£0
Shellfish ND – Portsmouth Harbour	2027	28	£67	£134	36	£125	£0
Priority Shellfish Waters - Imps	2030	2	£3	£3	2	£6	£0
Shellfish IMP – Langstone Harbour	2030	6	£26	£43	8	£56	£0
UPM	2030	17	£42	£33	17	£67	£0
SOAF – Ecological harm	2030	17	£27	£22	17	£42	£0
WFD - RNAG confirmed	2030	1	£1	£5	29	£27	£0
WFD - RNAG Probable	2030	0	£0	£1	56	£66	£0
Non-Priority Shellfish Water - IMP	2035	53	£172	£145	53	£70	£287
SOAF – Spills reduction	2035	19	£114	£141	26	£48	£196
High Spillers – Complex - start AMP8	2035	9	£18	£11	9	£8	£27
Coastal - Complex - start AMP8	2035	19	£99	£143	18	£52	£213
Investigations INV4	2027	223	£25	£0	303	£22	£0
TOTALS		186	£682	£722	286	£702	£724

Although this programme represents the February 2024 draft WINEP, there are high deliverability risks, not addressed in this addendum, which are subject to ongoing discussions with Defra and Ofwat. Of particular concern are the early 2027 delivery dates.

Important points for completion of CWW3

Throughout the development of the WINEP with our environmental regulators, we discuss overflows in terms of the regulatory drivers. Data table CWW3 is not structured around regulatory drivers, however, but by the solution type which makes it difficult to reconcile between the two. To support this submission, we have provided the lists of each overflow in the sections below. These show both statutory driver and solution type for reference.

In addition, we are proposing to deliver some schemes through an alternative delivery mechanism, similar to larger DPC schemes. In line with Ofwat's guidance, these costs are not included in table CWW3 but are reported through other tables including in particular SUP12 of the business plan. CWW3 therefore only includes the cost Southern will incur and not those of any third-party providers. The principles behind the use of alternative delivery routes can be summarised as:

- Schemes which were allocated for alternative delivery in October 2023 remain as alternative delivery in this submission (wetlands and highways surface water separation/SuDS).
- The overall value of schemes being delivered through alternative delivery has reduced to £247m as we are proposing to phase more into AMP9 some schemes that are within the scope of the alternative delivery programmes during in AMP8.
- AMP9 costs which have been accelerated for delivery in AMP8 have been allocated to conventional delivery and alternative delivery routes. The alternative delivery was applied to highways surface water separation/SuDs and wetland solutions in the same way as when we developed the business plan.

Each grouping of overflows is explained more fully in the following sections.

3. WFD No Deterioration

There are 51 locations that have been identified as deteriorating in terms of ecological condition ((SW_ND, BW_ND) in the following areas:

- North Kent and Solent
- Portsmouth Harbour

To meet the latest understanding of the timing and scope of the WINEP, the following changes are made to our PR24 October business plan WINEP regarding no deterioration overflows:

- All dates brought forward to meet the 2027 regulatory completion date. This includes some schemes which had a regulatory completion date of 2030 in our October submission.
- Inclusion of 8 additional overflows that discharge into Portsmouth Harbour. These overflows already spill less than 10 times per annum and had previously been excluded from our AMP8 programme but phased to a later date due to already meeting the Storm Overflow Discharge Reduction Plan (SODRP) requirements. However, they are required to be completed in AMP8 due to shellfish deterioration drivers which was confirmed during meetings with Defra, EA and Ofwat in January 2024.

These changes are captured in the business plan tables submitted to Ofwat on 16 February 2024. Changes to Section 2 of SRN40 Enhancing Storm Overflows Business Case to reflect the changes are described as follows.

Table 2 outlines the changes from October submission and the February 2024 draft WINEP.

Table 2 Changes between October business plan and February 2024 draft WINEP

Category	Reg date	October 2023 business plan			February 2024 draft WINEP		
		No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)	No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)
Bathing Water – No Deterioration	2027	1	£2	£2	1	£4	£0
Shellfish – No Deterioration	2027	14	£86	£39	14	£108	£0
Shellfish ND – Portsmouth Harbour	2027	28	£67	£134	36	£125	£0
Total		43	£155	£175	51	£238	£0

Since the submission in October 2023, there has been an increase in the number of overflows being addressed in AMP 8, with an increase of £83m for AMP8 in the February 2024 draft WINEP. All schemes previously in AMP 9 are brought forward into AMP8, and there is a significant difference to what is required to be delivered by 2027, in particular the overflows into Portsmouth Harbour shellfish waters.

The full list of overflows in these categories is provided in Table 3.

Table 3 WFD no deterioration overflows in February 2024 draft WINEP.

Storm Overflow Name	Solution Type	AMP8 Totex, £m (2022/23 prices)
Bathing water – no deterioration		
BOGNOR MAIN CEO	Storage Only	3.93
Shellfish water – no deterioration		
ABBAY ROAD FAVERSHAM CEO	SuDS + Storage	3.87
BOSHAM SSO	Wetland + Lining	2.75
COURT STREET FAVERSHAM CSO	Storage Only	0.75
DIAMOND ROAD WHITSTABLE CEO	SuDS + Storage	6.58
FAVERSHAM SSO	Storage Only	1.29
KINGS HALL HERNE BAY CEO	SuDS + Storage	17.49
QUEENBOROUGH SSO	SuDS + Storage	31.48
SCHOOL LANE HAMBLE CEO	SuDS + Storage	1.91
SINGLETON RELIEF CEO	Wetland + Lining	1.05
SITTINGBOURNE SSO	Storage Only	3.00
STOCKERS HILL BOUGHTON STREET CEO	SuDS + Storage	2.29
SWALECLIFFE CSO	Storage Only	16.34
TANKERTON CIRCUS CSO	SuDS + Storage	5.20
THORNHAM SSO	SuDS + Storage	14.48
Shellfish water – no deterioration – Portsmouth Harbour		
ARUNDEL DRIVE FAREHAM CSO	SuDS + Storage	1.11
BREWERS LANE GOSPORT CSO	Unknown	-
BRIDGEFOOT FAREHAM CEO	SuDS + Storage	4.07
BURY ROAD GOSPORT CEO	Screen Only (IMP5)	0.09
CAMBRIDGE ROAD GOSPORT CEO	SuDS + Storage	4.35
CAMS HILL FAREHAM CSO	Storage Only	6.00
COTSWOLD WALK FAREHAM CSO	SuDS + Storage	5.29
COURT LANE COSHAM SSO	SuDS + Storage	10.08
COW LANE PORTCHESTER CEO	Screen Only (IMP5)	0.09
ELMHURST ROAD FAREHAM CSO	SuDS + Storage	6.96
FAREHAM ROAD GOSPORT OUTSIDE 359 CSO	SuDS + Storage	11.27
FAREHAM ROAD GOSPORT OUTSIDE 68 CSO	SuDS + Storage	1.43
FOSTER ROAD GOSPORT CEO	SuDS + Storage	3.63
GLADYS AVENUE PORTSMOUTH CSO	Storage Only	1.16
GREEN CRESCENT GOSPORT CSO	SuDS + Storage	3.69

Storm Overflow Name	Solution Type	AMP8 Totex, £m (2022/23 prices)
GROVE ROAD GOSPORT CEO	SuDS + Storage	8.65
HIGH STREET FAREHAM CSO	SuDS + Storage	3.04
HOEFORD FAREHAM CEO	SuDS + Storage	1.26
HOLBROOK ROAD PORTSMOUTH CSO	Screen Only (IMP5)	0.09
LEES LANE GOSPORT CEO	Screen Only (IMP5)	0.09
MIDDLECROFT LANE GOSPORT CSO	Screen Only (IMP5)	0.09
MILE END ROAD PORTSMOUTH NO 1 CSO	SuDS + Storage	1.42
MILE END ROAD PORTSMOUTH NO 2 CSO	SuDS + Storage	5.37
NEWCOMEN ROAD PORTSMOUTH CSO	Screen Only (IMP5)	0.09
NORTH END AVENUE PORTSMOUTH CSO	SuDS + Storage	1.56
PIER ROAD SOUTHSEA CSO	SuDS + Storage	11.82
QUAY STREET FAREHAM CSO	SuDS + Storage	2.84
SALTERNS LANE FAREHAM CEO	Storage Only	6.55
SALTERNS LANE FAREHAM OUTSIDE 12 CSO	Storage Only	5.77
STAMSHAW ROAD PORTSMOUTH CSO	SuDS + Storage	5.65
THE GILLIES FAREHAM CSO	SuDS + Storage	1.49
WALLINGTON HILL FAREHAM CSO	Unknown	-
WICKHAM ROAD FAREHAM CSO	Unknown	-
WICOR MILL LANE PORTCHESTER CEO	SuDS + Storage	3.36
WIDLEY ROAD PORTSMOUTH CSO	SuDS + Storage	6.87
WINSTANLEY ROAD PORTSMOUTH CSO	Screen Only (IMP5)	0.09

4. Priority Waters

There are 129 locations (increase from 43) that have now been identified for improvements to reduce storm overflow spills to protect the environment so that they have no local adverse ecological impact.” (EnvAct_IMP2). In addition there are a small number of actions proposed to meet other drivers such as EnvAct_IMP3, EnvAct_IMP4 and SW_IMP).

The following changes to our October 2023 PR24 business plan would be required regarding improvements to our storm overflows into priority waters. The changes reflect the scope and costs of the February 2024 draft WINEP:

- Priority shellfish water improvements - 2 overflows in Whitstable and Chichester Harbour with delivery dates moved forward to 2030
- Langstone Harbour shellfish improvement schemes (SW_IMP) – the 4 existing overflows were moved to 2030 delivery dates. In addition, 4 overflows were added to our submission for the February 2024 draft WINEP. These had been excluded from our October 2023 submission as the spill frequency was less than 10 per annum. However, they have been included due to other concerns (not achieving good ecological status or compromising shellfish water quality).
- 34 overflows have been identified as priority overflows through the UPM and SOAF investigations in AMP7. The delivery date for improving all of these overflows was moved to a 2030 delivery date, rather than using the SODRP priorities to decide on the timing of improvements which was the basis of our business plan.
- 85 new overflows were added into the programme at the request of the EA, required under WFD as they are ‘Reasons for Not Achieving Good’ river water quality. These are overflows which are either confirmed or likely to be impacted ‘good ecological status’.

These changes have been captured in the business plan tables submitted to Ofwat on 16 February 2024. Changes to Section 3 of SRN40 Enhancing Storm Overflows Business Case to describe scope and costs of the latest understanding of the AMP8 WINEP are as follows.

Table 4 outlines the changes from October submission and the February 2024 draft WINEP.

Table 4 Changes for priority waters between October 2023 and February 2024 draft WINEP

Category	Reg Date	October 2023 business plan			February 2024 draft WINEP		
		No. Overflows in AMP8	AMP 8 (£m)	AMP9 (£m)	No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)
Priority Shellfish Waters - Imps	2030	2	£3	£3	2	£6	£0
Shellfish IMP – Langstone Harbour	2030	6	£26	£43	8	£56	£0
UPM	2030	17	£42	£33	17	£67	£0
SOAF – Ecological harm	2030	17	£27	£22	17	£42	£0
WFD - RNAG confirmed	2030	1	£1	£5	29	£27	£0
WFD - RNAG Probable	2030	0	£0	£1	56	£66	£0
TOTAL		43	£100	£107	129	£264	£0

The biggest change since the October 2023 Business Plan submission is the inclusion in AMP8 of schemes to address where our assets are assessed as “probable” reasons for not achieving good status under the WFD. However, further investigations are required to confirm whether the overflows are one of the reasons for not achieving good (RNAG) status, and if so which ones, before a solution can be designed to address the problem. There are 56 such cases of overflows which will require further investigation in AMP8, with potential work needed on all 56 cases depending on the investigation outcomes. In the October submission, we spread out the UPM and SOAF schemes over AMP8 and AMP9. In the January 2024 discussions, the EA has confirmed all must be addressed within AMP8.

The main other difference between the October business plan and the February WINEP is the inclusion in AMP8 of schemes that already meet the spill requirements (i.e., less than 10 a year), but are now included to meet other criteria i.e. to achieve good ecological status.

For these reasons, there is an increase of £164m in AMP8 under the revised February 2024 draft WINEP submission in this category of priority waters storm overflows.

Table 5 Priority Waters overflows in February 2024 draft WINEP

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
Shellfish Improvements – Langstone Harbour		
BUDDS FARM HAVANT SE7 CEO	SuDS + Storage	23.52
BUDDS FARM HAVANT SSO	SuDS + Storage	22.27
BURRFIELDS ROAD PORTSMOUTH CSO	Screen Only (IMP5)	0.11
FORT CUMBERLAND ROAD EASTNEY CSO	Storage Only	2.06
GREEN LANE HAYLING ISLAND CSO	Screen Only (IMP5)	0.11
KIRTLEY CLOSE DRAYTON CSO	Storage Only	2.75
MAINLAND DRAYTON SSO	SuDS + Storage	4.42
ST ANDREWS ROAD PORTSMOUTH CSO	SuDS + Storage	0.84
Priority Shellfish Waters - Improvements		
NORTHWOOD ROAD WHITSTABLE NO 1 CSO	SuDS + Storage	4.73
PRIORS LEAZE LANE NUTBOURNE CSO	SuDS + Storage	0.84
UPM		
BURITON CEO	Wetland + Lining	0.46
CUCKFIELD ROAD HURSTPIERPOINT 112 CSO	SuDS + Storage	2.06
CUCKFIELD ROAD HURSTPIERPOINT CEO	SuDS + Storage	1.81
FAIRLIGHT SSO	SuDS + Storage	3.08
FAIRPLACE HILL BURGESS HILL CEO	SuDS + Storage	13.65
FLORENCE FARM GROOMBRIDGE EMO	Storage Only	0.79
FOXHILL HAYWARDS HEATH CEO	SuDS + Storage	1.27
FREEKS LANE BURGESS HILL CSO	SuDS + Storage	6.89
LONDON ROAD BEXHILL CSO	SuDS + Storage	2.31
MALTHOUSE LANE BURGESS HILL CEO	SuDS + Storage	1.40
NEVILLE STREET TUNBRIDGE WELLS CSO	Storage Only	1.05
PETERSFIELD SSO	SuDS + Storage	9.46
RUMBOLDS LANE HAYWARDS HEATH CSO	SuDS + Storage	2.23
TUNBRIDGE WELLS SOUTH CSO	Wetland + Lining	14.40
TUNBRIDGE WELLS SOUTH SSO	Wetland + Lining	2.13
WILLOW WAY HURSTPIERPOINT CSO	SuDS + Storage	0.91
WIVELSFIELD SSO	SuDS + Storage	2.83
SOAF – Ecological harm		
ASHINGTON SSO	SuDS + Storage	1.71
BARCOMBE NEW SSO	SuDS + Storage	1.97
CALBOURNE SSO	Wetland + Lining	0.26
CHIDDINGFOLD SSO	SuDS + Storage	1.60

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
CRANBROOK SSO	Wetland + Lining	2.57
FELBRIDGE CSO	SuDS + Storage	2.20
FORDCOMBE CSO	SuDS + Storage	1.45
GUESTLING GREEN SSO	SuDS + Storage	0.62
HAILSHAM NORTH SSO	SuDS + Storage	4.69
HAILSHAM SOUTH STORM CSO	SuDS + Storage	3.44
HIGH HALDEN SSO	SuDS + Storage	3.01
LOXWOOD SSO	SuDS + Storage	2.21
MAY STREET HERNE BAY SSO	Storage Only	8.97
MILL CORNER NORTHAM CSO	SuDS + Storage	1.36
PRIORY MILL TONBRIDGE CEO	SuDS + Storage	2.72
SLINFOLD SSO	Storage Only	1.73
SMALL DOLE SSO	SuDS + Storage	1.47
WFD – RNAG confirmed		
BIDBOROUGH SSO	Storage Only	1.63
BLACKMORES FARM WIVELSFIELD CSO	SuDS + Storage	1.24
CASTLE TERRACE HAWKHURST CSO	SuDS + Storage	2.02
CHICHESTER ROAD BOGNOR CSO	Screen Only (IMP5)	0.11
FELRIDE HAYWARDS HEATH CSO	Screen Only (IMP5)	0.11
GLEBE COTTAGES PETT CEO	Screen Only (IMP5)	0.11
GLOUCESTER ROAD BOGNOR CSO	Screen Only (IMP5)	0.11
GODSTONE SSO	SuDS + Storage	4.35
GRASMERE ROAD CHESTFIELD STORM TANKS CSO	Screen Only (IMP5)	0.11
HAWKHURST NORTH SSO	SuDS + Storage	1.55
HOLDEN CORNER TUNBRIDGE WELLS CSO	SuDS + Storage	1.21
HURSTWOOD TUNBRIDGE WELLS CEO	Storage Only	1.26
LAKE ROAD TUNBRIDGE WELLS CSO	Unknown	-
LANGHOLM ROAD LANGTON GREEN CSO	Screen Only (IMP5)	0.11
LEEDS SSO	SuDS + Storage	1.18
LONDON ROAD BURGESS HILL CSO	Screen Only (IMP5)	0.11
LOWER WAITES LANE FAIRLIGHT NO 1 CSO	Storage Only	1.12
LOWER WAITES LANE FAIRLIGHT NO 2 CSO	Unknown	-
PARK ROAD BURGESS HILL CSO	Screen Only (IMP5)	0.11
ROLVENDEN LAYNE SSO	Wetland + Lining	0.38
SANDHURST SSO	Wetland + Lining	1.00
SHRIPNEY ROAD SOUTH BERSTED CEO	Wetland + Lining	0.77

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
SOUTH STREET DITCHLING CSO	SuDS + Storage	1.50
SOUTHBOROUGH CEMETERY TUNBRIDGE WELLS CSO	Storage Only	1.53
TANGMERE SSO	Unknown	-
TANYARD LANE SOUTHBOROUGH CSO	SuDS + Storage	1.68
TAYLOR STREET SOUTHBOROUGH CSO	SuDS + Storage	2.43
WAITES LANE FAIRLIGHT CSO	SuDS + Storage	1.51
WATERFRETS LANGTON GREEN CSO	Screen Only (IMP5)	0.11
WFD – RNAG probable		
AMBERSTONE VIEW HAILSHAM NEW CSO	SuDS + Storage	0.98
APPLEDORE ROAD WOODCHURCH CEO	SuDS + Storage	2.00
BROOKSIDE DAIRY WROXALL CSO	Screen Only (IMP5)	0.11
CHARCOTT PLACE CEO	Storage Only	1.08
CHARLWOODS ROAD EAST GRINSTEAD CSO	Screen Only (IMP5)	0.11
COLDHARBOUR LANE HILDENBOROUGH REAR 30 CSO	Screen Only (IMP5)	0.11
COPTHORNE ROAD DOMEWOOD CEO	Storage Only	1.34
CROUCH FARM MAYFIELD SSO	SuDS + Storage	0.84
DAMBRIDGE WINGHAM SSO	Unknown	-
EDEN VALE EAST GRINSTEAD SSO	SuDS + Storage	0.88
EGGPIE LANE LEIGH CSO	SuDS + Storage	2.04
FERNHILL CLOSE CRAWLEY DOWN OUTSIDE 10 CSO	Screen Only (IMP5)	0.11
FOADS LANE RAMSGATE CEO	Screen Only (IMP5)	0.11
FURNACE POND CEO	SuDS + Storage	1.04
FURZEFIELD ROAD BALDWINS HILL CEO	SuDS + Storage	3.76
GROSVENOR REC GROUND TUNBRIDGE WELLS CSO	Screen Only (IMP5)	0.11
HAILSHAM NORTH CEO	SuDS + Storage	0.88
HAYLIND ROAD HAYWARDS HEATH CSO	SuDS + Storage	2.57
HIGH STREET POLEGATE CSO	Screen Only (IMP5)	0.11
HILDEN BRIDGE CEO	Screen Only (IMP5)	0.11
HORSMONDEN ROAD BRENCHLEY CEO	SuDS + Storage	1.76
HOSPITAL FARM HARBLEDOWN CEO	SuDS + Storage	3.72
LEWES ROAD LINDFIELD CEO	Screen Only (IMP5)	0.11
LINGFIELD HOSPITAL SCHOOL CEO	Screen Only (IMP5)	0.11
LOWER ROAD WOODCHURCH CSO	SuDS + Storage	0.97
LYNHOLM ROAD POLEGATE NO.1 CSO	Storage Only	0.77

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
LYNHOLM ROAD POLEGATE NO.2 SSO	SuDS + Storage	3.11
MILL GREEN ROAD HAYWARDS HEATH CSO	Screen Only (IMP5)	0.11
MONTAGUE WAY WESTHAM CEO	Screen Only (IMP5)	0.11
NOAHS ARK LANE LINDFIELD CEO	Screen Only (IMP5)	0.11
NORTH FARM ROAD TUNBRIDGE WELLS CSO	Screen Only (IMP5)	0.11
NUTLEY SSO	SuDS + Storage	1.37
OXENDEAN GARDENS WILLINGDON CSO	Screen Only (IMP5)	0.11
PADDOCK WOOD SSO	SuDS + Storage	7.04
PASTURE HILL ROAD CSO	Storage Only	1.00
PELHAM ROAD LINDFIELD CSO	SuDS + Storage	0.76
PENN CRESCENT HAYWARDS HEATH OUTSIDE 31 CSO	Screen Only (IMP5)	0.11
PENN CRESCENT HAYWARDS HEATH OUTSIDE 53 CSO	Screen Only (IMP5)	0.11
PENNINGTON ROAD SOUTHBOROUGH CEO	Screen Only (IMP5)	0.11
PORTSMOUTH LANE LINDFIELD CEO	Screen Only (IMP5)	0.11
RATTLE ROAD WESTHAM CEO	SuDS + Storage	8.78
RIDING LANE HILDENBOROUGH CSO	SuDS + Storage	1.20
SOUTHFIELD POLEGATE CSO	Unknown	-
SOVEREIGNS WAY MARDEN OLD WORKS CEO	SuDS + Storage	1.33
ST LUKES ROAD TUNBRIDGE WELLS CSO	Unknown	-
STATION ROAD HAILSHAM CSO	Screen Only (IMP5)	0.11
STONE HILL ROAD EGERTON SSO	SuDS + Storage	0.82
TATT YALDING CEO	Wetland + Lining	3.39
TOWN FARM HAILSHAM CEO	Screen Only (IMP5)	0.11
TOWN ROW ROTHERFIELD NO 1 CSO	SuDS + Storage	1.92
TOWN ROW ROTHERFIELD NO 2 CSO	SuDS + Storage	1.35
TUNBRIDGE WELLS NORTH SSO	SuDS + Storage	3.12
WANNOCK ROAD WANNOCK CSO	Screen Only (IMP5)	0.11
WESTERN ROAD HAYWARDS HEATH CSO	Screen Only (IMP5)	0.11
WILLINGDON NO 2 CEO	SuDS + Storage	1.45
WROXALL CEO	SuDS + Storage	2.21

5. Non-priority waters

This group of overflows include the 2 drivers of non-priority shellfish waters and SOAF overflows required to reduce spills. Both of these were included in our Business Plan submission in October 2023, spread over 7 years across AMP8 and AMP9. The recent regulatory reviews with Defra, EA and Ofwat confirmed the delivery date for these overflows can be 2035. In this revised submission we have maintained the proposed 7 year delivery programme but delayed the start of the scheme until later in AMP8 with completion prior to 2035. This has reduced the costs of the programme included in AMP8.

These changes have been captured in the business plan tables submitted to Ofwat on 22nd February 2024. Changes to Section 3 SRN40 Enhancing Storm Overflows Business Case to describe scope and costs of the February 2024 AMP8 WINEP are as follows.

Table 6 outlines the changes from October submission and the February 2024 draft WINEP.

Table 6 Changes for non-priority shellfish and SOAF between October 2023 and February 2024 draft WINEP

Category	Reg Date	October 2023 business plan			February 2024 draft WINEP		
		No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)	No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)
Non-Priority Shellfish Water - IMP	2035	53	£172	£145	53	£70	£287
SOAF – Spills reduction	2035	19	£114	£141	26	£48	£196
Total		72	£286	£286	79	£118	£483

The biggest change between the two plans is the alteration of phasing over AMPs8 and 9. There has been a slight increase in the number of overflows, but the costs are now spread. Some of the spill reduction schemes have proven to cause no ecological harm, but will need to be completed to address the number of spills reduction category.

Table 7 lists the overflows and associated costs relating to non-priority shellfish and those relating to AMP7 SOAF investigations.

Table 7 Non-priority shellfish and SOAF overflows in February 2024 draft WINEP

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
Non-Priority Shellfish Water - Improvements		
ALBANY ROAD EAST COWES CEO	SuDS + Storage	1.89
APPLEY PARK RYDE TRANSFER CEO	SuDS + Storage	7.97
ASHLETT CREEK FAWLEY SSO	Storage Only	0.12
BARGE LANE WOOTTON BRIDGE OUTSIDE 5 CSO	SuDS + Storage	0.27
BARROWS BROOK EASTCHURCH CEO	SuDS + Storage	0.81
BEAULIEU VILLAGE SSO	SuDS + Storage	0.28
BLECHYNDEN TERRACE SOUTHAMPTON CSO	SuDS + Storage	1.76
BOW BRIDGE FRESHWATER CEO	SuDS + Storage	0.50
CHICHESTER WTW 1 SSO	Wetland + Lining	0.12
CHICHESTER WTW 2 SSO	Wetland + Lining	4.63
DODNOR CEO	SuDS + Storage	1.64
DODNOR LANE NEWPORT CSO	SuDS + Storage	0.26
EGYPT POINT COWES CEO Pumped	SuDS + Storage	0.57
ENSIGN PARK HAMBLE CEO	SuDS + Storage	0.66
FAIRLEE CSO	SuDS + Storage	5.98
FAIRLEE ROAD NEWPORT OUTSIDE 62 CSO	SuDS + Storage	0.19
FISHBOURNE LANE FISHBOURNE IOW CEO	SuDS + Storage	0.23
FISHBOURNE LANE RYDE CSO	SuDS + Storage	0.28
GAINSBOROUGH DRIVE HERNE BAY CEO	SuDS + Storage	0.30
GRAIN CEO	Storage Only	0.12
HENDERSON ROAD EASTNEY CSO	SuDS + Storage	2.72
HOOK PARK NO.1 CEO	SuDS + Storage	0.74
HOOK PARK NO.2 CEO	Storage Only	0.22
KITE HILL WOOTTON CEO	SuDS + Storage	0.19
LADIES WALK BINSTED CEO	SuDS + Storage	0.32
MAIN ROAD PORCHFIELD CEO	SuDS + Storage	0.41
MARKET HILL COWES CSO	Storage Only	0.36
MEDINA ROAD COWES CEO	SuDS + Storage	2.84
MILFORD ROAD PENNINGTON SSO	Wetland + Lining	4.61
MILL LANE SHALFLEET CEO	Storage Only	0.28
MILL SQUARE WOOTTON CSO	SuDS + Storage	0.24
MILLBROOK SSO	Storage Only	2.23
NEW ROAD WOOTTON CEO	SuDS + Storage	0.71
NORTON TRANSFER IOW INLET CEO	SuDS + Storage	0.51
NORTON TRANSFER IOW PUMPED CEO	SuDS + Storage	0.62
NORTON TRANSFER IOW SSSI CEO	SuDS + Storage	2.16

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
PARK ROAD SOUTHAMPTON CSO	SuDS + Storage	5.35
PEEL COMMON SSO	Storage Only	1.04
PRINCE CONSORT RYDE CEO	SuDS + Storage	1.94
PRIOR CRESCENT NEWPORT CSO	Storage Only	0.65
ROSANNA SAILING SCHOOL WOOTTON CSO	SuDS + Storage	0.20
SCHOOL GREEN ROAD FRESHWATER CEO	SuDS + Storage	0.28
SIMEON STREET RYDE CSO	SuDS + Storage	0.48
SLOWHILL COPSE MARCHWOOD SSO	SuDS + Storage	2.71
SOUTH STREET NEWPORT CSO	SuDS + Storage	0.20
SPRINGHILL COWES TRANSFER CEO	SuDS + Storage	1.78
ST MARYS ROAD COWES CSO	SuDS + Storage	0.61
TERMINUS ROAD COWES CSO	Storage Only	0.46
THE QUAY NEWPORT CEO	SuDS + Storage	0.64
THORLEY ROAD BOULDNOR CEO	SuDS + Storage	0.26
WARDS HILL ROAD MINSTER IOS CEO	Storage Only	0.35
WOODVALE TRANSFER CSO	Storage Only	2.57
WOOLSTON SSO	SuDS + Storage	3.20
SOAF – Spills reduction		
APPLE TREE LANE TUNBRIDGE WELLS CSO	SuDS + Storage	2.91
BILLINGSHURST SSO	SuDS + Storage	0.55
CANNON LANE TONBRIDGE CSO	SuDS + Storage	0.75
CHARING SSO	Wetland + Lining	0.42
FITTLEWORTH SSO	SuDS + Storage	0.39
HAWKHURST SOUTH SSO	SuDS + Storage	0.43
HILDEN PARK ROAD HILDENBOROUGH CEO	SuDS + Storage	0.69
LINGFIELD SSO	Wetland + Lining	1.83
MARSHALL CLOSE BARNHAM CSO	Storage Only	0.25
MONKS GATE SSO	Wetland + Lining	0.07
NEAVES LANE RINGMER SSO	SuDS + Storage	0.56
OXTED SSO	Wetland + Lining	3.63
PETWORTH CSO	SuDS + Storage	0.31
REDGATE MILL CROWBOROUGH SSO	Storage Only	2.41
STUBBS LANE BREDE SSO	Wetland + Lining	0.30
SUMMER LANE PAGHAM SSO	SuDS + Storage	0.38
WEST WELLOW SSO	SuDS + Storage	0.52
WESTFIELD SSO	SuDS + Storage	0.00
WICKHAM SSO	Wetland + Lining	0.42

6. Customer Priority overflows

This group of overflows are high priorities for our customers and stakeholders.

Top 30 highest spilling overflows

As set out in SRN40 Storm Overflow Business Case, our customers supported the inclusion of our top 30 highest spilling overflows. Of these 14 were already in our plan as they were required due to statutory requirements. Our submitted plan in October 2023 included an additional 16 high spilling overflows to ensure all 30 were being addressed in AMP8.

Through the regulatory reviews with national EA, 7 of the additional 16 are now also required to meet statutory drivers so are included within the previous groups of storm overflows. The programme submitted on 22 February 2024 includes the remaining 9 high spilling overflows. To support the deliverability challenges the February 2024 draft WINEP presents us with, these overflows have been phased to start later in AMP8 and with delivery completing by 2035. This enables us to maintain the recommended 7 year delivery programme, but with lower costs incurred in AMP8.

Coastal overflows

Our business plan submitted in October 2023 brought forward the start of investment for 19 additional coastal overflows that were previously planned for AMP9. This was in recognition that many of our larger wastewater systems and resident population centres are along the coast. Discharges tend to involve larger volumes and have more complex sewerage systems. Starting early enables us to meet the priorities of local customers, and support businesses and the coastal economy in the South East. This approach was supported by our customers.

Through the recent regulatory reviews we have made the following changes:

- Of the 19 proposed overflows, 1 was not discharging into a priority water and has been removed from our AMP8 plan
- The other 18 have been phased to start later in AMP8 with delivery completing by their required 2025 dates.

Table 8 outlines the changes from October submission and the February 2024 draft WINEP for customer priority overflows.

Table 8 Changes for Customer priorities between October 2023 and February 2024 draft WINEP

Category	Reg date	October 2023 business plan			February 2024 draft WINEP		
		No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)	No. Overflows in AMP8	AMP8 (£m)	AMP9 (£m)
High Spillers – Complex - start AMP8	2035	9	£18	£11	9	£8	£27
Coastal - Complex - start AMP8	2035	19	£99	£143	18	£52	£213
Total		28	£117	£154	27	£60	£240

The changes from October submission and the February 2024 draft WINEP for customer priorities is largely in the phasing of the schemes throughout AMP 8 and 9.

Table 9 outlines the overflows and associated costs for customer priority overflows investment in AMP8.

Table 9 Customer priority overflows in February 2024 draft WINEP

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
High Spillers – Complex - start AMP8		
Halland SSO	Wetland + Lining	0.11
KINGS SOMBORNE SSO	Wetland + Lining	1.24
LIDSEY SSO	Wetland + Lining	1.65
MOTNEY HILL NO.1 SSO	SuDS + Storage	1.44
QUICKBOURNE LANE NORTHIAM SSO	SuDS + Storage	0.40
REDLYNCH SSO	Wetland + Lining	0.22
SOUTH HARTING SSO	Wetland + Lining	0.20
ST HELENS SSO	Wetland + Lining	1.35
WEST HYTHE K CSO	Wetland + Lining	1.87
Coastal - Complex - start AMP8		
BEXHILL & HASTINGS CSO	SuDS + Storage	7.91
BROADSTAIRS CEO	SuDS + Storage	5.90
BROCKLEY ROAD BEXHILL CSO	SuDS + Storage	0.75
EAST BEACH ROAD SELSEY CEO	Wetland + Lining	0.57
EAST DEAN SSO	SuDS + Storage	0.15
HILLWAY BEMBRIDGE CEO	Storage Only	0.43
HYDE DESTRUCTOR SHANKLIN CSO	Storage Only	0.27
LANE END STORAGE TANKS BEMBRIDGE CEO	SuDS + Storage	1.61
LYDD ROAD CAMBER CEO	Storage Only	0.30

Storm Overflow Name	Solution Type	AMP8 Totex, £m 2022/23 prices
MADEIRA ROAD TOTLAND SSO	SuDS + Storage	0.35
OUTSIDE 83 EAST BEACH SELSEY CEO	Wetland + Lining	0.57
RANGE ROAD HYTHE K CSO	Wetland + Lining	1.61
SALTERNS ROAD HILL HEAD CEO	SuDS + Storage	0.54
SANDOWN NEW NO.1 SSO	SuDS + Storage	9.74
SHOREHAM CSO	Wetland + Lining	-
SOUTH TERRACE LITTLEHAMPTON CSO	SuDS + Storage	2.62
THE POINT BEMBRIDGE NEW CEO	Storage Only	0.28
WEST PARK BOGNOR REGIS CEO	SuDS + Storage	0.24

Within this group of overflows we will require an uncertainty mechanism to enable us to accelerate additional investment into AMP8, on condition we remain on track to deliver the other statutory overflows. We recognise the importance of delivering the statutory programme and have highlighted concerns around deliverability. However, the January review session with Defra, EA and Ofwat recognised these important customer priorities and proposed to address this through a suitable adjustment mechanism.

7. Remaining uncertainties

There remain some material uncertainties in the scope and costs of the WINEP that will not be resolved until the completion of the relevant studies and investigations due for completion in early 2027. In our Business Plan submitted in October 2023 we had proposed to phase these areas of uncertainties into AMP9 for delivery. To meet the earlier dates required by the EA these uncertainties will now require an appropriate adjustment mechanism for AMP8.

a. Portsmouth Harbour

There are 8 additional storm overflows in Portsmouth Harbour with annual spill frequencies already less than 10 per annum and therefore meeting storm overflow discharge reduction targets. Our proposed solutions and costs across the full programme have been based on reducing spill frequency to 10 spills per annum. This means the scope and costs required for these overflows is likely to be higher than the CWW3 costs, the investigation to confirm requirements is not due for completion until early AMP8. For example, the current costs may only allow for a new screen but the investigation may show that further work is required to achieve a lower spill frequency – as yet uncoded.

b. Langstone Harbour

There are 4 additional storm overflows in Langstone Harbour with annual spill frequencies already less than 10 per annum and therefore meeting storm overflow discharge reduction targets. Our proposed solutions and costs across the full programme have been based on reducing spill frequency to 10 spills per annum. This means the scope and costs required for these overflows is likely to be higher than the CWW3 costs. The investigation to confirm requirements is not due for completion until early AMP8.

c. WFD – Reasons for not achieving good ecological status (RNAG)

There are 29 overflows which are confirmed as being the reason the local watercourse does not meet good ecological status. However, there are a further 56 overflows which are probable but not confirmed as the RNAG. Our programme includes investigations to review and assess needs which concludes in early AMP8. This will enable determination whether all the 56 overflows require schemes to reduce spills.

Uncertainty mechanisms have been proposed as part of our submission to take account of changes to either the need for schemes or the scope and cost of schemes that could happen during AMP8. These need to remain symmetrical and allow for investigations to be completed and changes in the programme to be agreed with regulators.

d. Further acceleration of customer priority overflows

We recognise the importance of delivering our statutory obligations as part of our storm overflow programme and the deliverability challenges to meet the early delivery dates and a larger WINEP programme. There are two priority areas for our customers and

stakeholders – the highest spilling overflows and coastal overflows potentially impacting local amenities. Customers have been clear that they want us to address these quickly. Following the reviews with Defra, EA and Ofwat we have amended the phasing of investment in these areas in order to prioritise the early statutory delivery dates. However, we also agreed in those sessions with regulators to include an appropriate adjustment mechanism to enable further acceleration of investment on condition we remain on track to deliver our statutory schemes.

e. Transition funding

We are reviewing the full extent of our transition programme for 2024-25, in the light of the WINEP to ensure we focus the funding on delivering the AMP8 investigations and earliest storm overflows regulatory delivery dates.