

Storm overflow reduction plan

How regulatory requirements help us prioritise

In the UK, water companies are governed by strict guidance, frameworks and regulations that we must follow. This supports good decision making, making sure we take into consideration a range of factors including any benefit to the environment and impact on customer bills.

Ofwat, one of the water sector's regulators, sets out how much water companies can invest in their networks every five years – and how they should set customer bills.

Working with our regulators, we prioritized reducing the use of storm overflows in line with <u>Government and regulatory targets</u> to reduce impact on shellfish waters, environmentally sensitive sites and bathing waters.

While we're focusing on reducing high frequency release sites, because of our long stretch of coastline we operate a significant number of storm overflows that release into shellfish areas. We're required by our regulators to look at these sites first.

We agree with what our customers are telling us, that we need to increase our investment now so we can deliver real change in our communities.

Our <u>Clean Rivers and Seas Plan</u> includes a record investment of £1.5 billion between 2025 and 2035, focusing on delivering long-term solutions that get to the root cause of these storm overflows.

Introduction to WINEP

One of the frameworks that UK water companies must follow is the Water Industry National Environment Programme (WINEP).

Developed by the Environment Agency (EA) it sets out the environmental improvements water companies in England must deliver within each five-year Asset Management Period (AMP).

For us, the WINEP process has been key in prioritising which storm overflows we focus on by assessing environmental and ecological impact.

How the process works

1. Evidence-based prioritisation

We use monitoring data, advanced modelling, and environmental impact assessments to identify which storm overflows are causing the most harm – for example, frequent releases near ecologically sensitive or recreational areas.



2. Risk-based prioritisation from the Environment Agency

The WINEP directs investment to the highest-risk storm overflows first, such as those:

- Affecting bathing waters or shellfish waters
- Near Sites of Special Scientific Interest (SSSIs) or Natura 2000 sites
- With high release frequency or volumes.

3. Regulatory drivers taken into consideration

Storm overflows included in WINEP are often tied to specific environmental drivers, such as the Water Framework Directive, Shellfish Waters Directive, and Bathing Water Directive. This ensures that actions are legally aligned and outcome-focused.

4. Collaboration to decide on which overflows to address

We've worked with the EA, to consider the above three factors and agree on which storm overflows should be improved, monitored or investigated. These are then included in the WINEP for delivery within the five-year Asset Management Period (AMP).

5. Phased investment and delivery

Due to the scale and cost of addressing all storm overflows, investment is prioritised and delivered in phases.

- High-priority storm overflows identified through WINEP are addressed in the current five-year investment period (2025–30), the remaining overflows are deferred to future business plans based on emerging evidence and funding.
- Where possible, we must be flexible to make sure that we can respond to new risks or priorities
 within the regulatory guidance. In certain circumstances, we can request additions to the WINEP
 programme during an investment period, as part of an independently audited delivery plan.

Looking to the future

We have almost 1,000 storm overflows in our region and 50% of these are already hitting the Government's 2050 target, for example releasing 10 times or less a year. Our <u>Clean Rivers and Seas Plan</u> sets out how we'll tackle the remaining storm overflows that need attention in our region.

We'll deploy a range of solutions into our communities to prevent or slow the flow of rainwater and/or groundwater entering the network. This will include <u>natural solutions</u> alongside improvements to assets. Collaboration is key, and we must work with local authorities, communities and partners across our region to establish the right solution, in the right place and at the right time.

By 2035, 75% of our high priority overflows will meet the <u>Government's 2050 target</u>, therefore, reducing storm overflow releases by an average of 8,000 a year. This represents an 81% reduction in releases in bathing water areas and an 80% reduction in releases in shellfish areas by 2035.

