

Blueprint for Water response: Storm Overflow Assessment Framework (SOAF)

24th January 2025

This consultation response is on behalf of Wildlife and Countryside Link (Link), a coalition bringing together 86 organisations to campaign for the natural world.

This response is supported by Angling Trust, Campaign for National Parks, Friends of the Earth England, Institute of Fisheries Management, Marine Conservation Society, Paddle UK, River Action, The Rivers Trust, The Wildlife Trusts.

Summary

Blueprint for Water¹ welcomes the the opportunity to respond to this consultation on the Storm Overflow Assessment Framework (SOAF).

Notwithstanding concerns² held by some Blueprint members regarding the Storm Overflows Discharge Reduction Plan (SODRP), we broadly agree with the proposals to revise the SOAF to align with the SODRP, to seek a greater consistency of approach and to increase efficiency.

We suggest that a further beneficial revision could be to incorporate the ‘high priority sites’ identified in the SODRP into Stage 1 of the SOAF, such that storm overflows spilling into these sites are prioritised for swift investigation. We would also welcome further evidence and clarification on the Ecological Impact Assessment Approach, particularly around modelling, and assertions that a target of 10 spills is sufficient ‘in most cases’ to prevent ecological harm. Furthermore, clarity on the process and timescale for developing an ecological standard for coastal and estuarine waters, and what this standard is expected to include, would be welcome.

¹ [Blueprint for Water](#), part of Wildlife and Countryside Link, is a unique coalition of environmental, water efficiency, fisheries and recreational organisations that come together to form a powerful joint voice across a range of water-based issues.

² For example, see Blueprint for Water’s responses to consultations regarding the SODRP: [Blueprint for Water SODRP Consultation Response 12_05_2022.pdf](#) & [WCL Response Storm Overflows Discharge Reduction Plan Consultation July 2023.pdf](#)

Any review and update of the cost-benefit analysis ratios and analysis should better incorporate natural capital into these processes, to ensure that the full range of benefits and impacts on nature and people can be taken into account when assessing improvement options. We would welcome the opportunity to share thoughts and comments on the proposed updates once these have been developed.

Given the technical nature of the questions, we suggest further opportunities to workshop the proposals with stakeholders including eNGOs would be helpful. We also note that with the Environment Agency and Defra consulting on related documents at the same time, it would be helpful for the final published versions to clarify any relationships between the three documents as well as with further documents set to be consulted on.

We would be pleased to discuss any of the points raised in our response further.

Questions

Q: Is it appropriate for us to revise the trigger thresholds for a SOAF investigation? Are these the right trigger thresholds to move to?

Yes. It is appropriate to revise the trigger thresholds for a SOAF investigation to reflect growing expectations on water companies to reduce discharges from storm overflows, growing understanding of spills with the introduction of EDM, and to align with targets and expectations set within the Storm Overflows Discharge Reduction Plan (SODRP).

We see the logic of aligning the trigger threshold for 3 or more years (where the duration of monitoring gives increased confidence in the average figure) with the SODRP target of 10 spills, as overflows exceeding this threshold now are extremely unlikely to meet the 2050 target of 10 spills without action, and therefore need to be investigated. It also follows that a higher threshold should be required to trigger an investigation based on fewer years of data, where confidence in spill frequency is naturally lower.

However, we suggest that the threshold should be reduced if the period includes years which are drier than average. For example, if data from the first year of monitoring showed an overflow discharging 28 times in a dry year, this should be cause for concern, but would not exceed the threshold for investigation as currently proposed. We suggest that reduced trigger levels are considered; for example, of 25 (1 year's data), 18 (2 years' data) and 9 (three years' data) if the period in question includes a dry year. In addition, EDM mapping platforms show

that monitors are often off-line for various reasons and would miss any spills in the period during which they are not operational. We therefore suggest that the same reduced triggers are used if the monitor has been non-operational for more than 10% of the monitoring period in question.

Q: Do you think we should make any changes to Stage 1?

We agree that overflows should be identified for investigation based on spill frequency triggers as set out in the consultation document, and as per our above comments. However, we suggest that further measures of likely risk/impact could be incorporated into this first step.

For example, the SODRP identifies ‘high priority sites’ that have stricter targets for improvement, given the greater potential impact of harm caused to people and the environment. These sites include bathing waters, chalk streams, Sites of Special Scientific Interest (SSSIs), marine protected areas, and Shellfish Water Protected Areas. This concept of ‘high priority sites’ could be incorporated into Stage 1 of the SOAF with a lower investigation trigger, such that storm overflows spilling into these sites are prioritised for swift investigation.

This would sit a step earlier than the Environmental Impact Assessment, in recognition of the increased potential for harm at these sites, and therefore the importance of an investigation taking place. This would also keep the SOAF in line with priorities as set out in the SODRP.

Higher priority should also be given to sites within national parks and national landscapes. Companies wholly or mainly in England that have operations within National Parks or National Landscapes must consider their statutory obligations to seek to further the purposes of these landscapes.³

Under section 245 of the Levelling Up and Regeneration Act (2023) water companies in exercising or performing any functions in relation to, or so as to affect, these landscapes, must seek to further the purpose of conserving and enhancing:

1. Wildlife, natural beauty, cultural heritage and promoting opportunities for public enjoyment in National Parks, and;
2. Natural beauty in National Landscapes.

³ [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](https://www.gov.uk/guidance/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes)

Q: Should we align our approach for Stage 2 (environmental impact assessment) with the SODRP and increase the focus on water quality modelling?

We can see the merits of aligning approaches for the environmental impact assessment (SOAF Stage 2) with the SODRP, given the suggestion that this will increase efficiency and reduce duplication of efforts and monitoring.

Q: Do you have any comments on the Ecological Impact Investigation Approach?

The document states that “Experience shows that in many cases a ten spills target goes beyond the requirements of protecting ecological use as defined by the UPM standards.” However, it notes that due to a focus on high spilling overflows ‘there is not sufficient data for a robust conclusion at all spill frequencies and environments’.

As such, we agree that any future UPM studies should seek to plug this gap by focusing on overflows where this assessment has not yet been made and where there may be a risk of exceeding the ecological harm standards at spill frequencies *below* 10 spills per year. This information should also be used to revise either the EIIA approach (via the recommended revisiting of the approach ahead of PR29 / PR34) or the SODRP targets when reviewed in 2027.

We recognise that in cases where protracted investigations would delay investment, wherever improvements can instead be made on a ‘no regrets’ basis, this would be the preference. However, we also note that in the parallel consultation on permitting, UPM investigations may play an important role in making the case for setting a permit threshold of lower than ten; where such investigations serve a dual purpose there is a stronger case for them to go ahead.

We note that the UPM review identified for low dilutions that the 10 spills threshold may not be sufficient to protect against ‘no adverse ecological impact’. We therefore welcome consideration of dilution ratios in the proposed investigation process, noting that low dilution is more likely to be a factor in smaller streams and tributaries with low flow rates. These locations are often overlooked in policy terms, as set out in our [‘Charter for Small Waters’](#), but are a crucial repository of freshwater biodiversity.

We would also welcome further detail to explain how water quality modelling will be checked/tested against ‘real life’ outcomes to ensure that assumptions and modelled

predictions are correct, particularly where EDM data is not available/sufficient. For example, the graphic explaining the proposed investigation process states in Stage 3 that 'where the 10 spills (average over 10 years) design is *predicted* to meet standards, then no further study is required'. How are these predictions made, and what action will be taken to assess whether they are accurate?

Finally, we suggest that some consideration of the specific impacts to the SODRP's priority sites (described above) is included in the assessment. This could include, for example, predictions about the impacts of SOs upon Bathing Water parameters such as E.Coli, as is currently being investigated by Wessex Water, using AI to predict where a risk to bathers may occur.

We would welcome an update on the process and timescale for developing an ecological standard for coastal and estuarine waters, and further detail on what this standard is expected to include.

Q: We are reviewing the BCRs in the SOAF CBA. Do you have a view on what they should be?

The benefit cost ratios need to incorporate natural capital, to ensure that these reflect the full range of benefits and impacts from all potential storm overflows improvement options.

In the absence of a full natural capital-led approach, we would want to ensure in the interim that the methodology includes some process for ensuring that proposals with a BCR of slightly below 1 are considered for action if they will also deliver additional non-monetised benefits that do not feature in the formal cost benefit assessment. For example, a revised BCR approach should allow for schemes which are *nearly* cost-beneficial, and which also deliver additional biodiversity / carbon / flood risk / etc. benefits which are not accounted for, to go ahead despite not *quite* meeting BCR thresholds.

We would welcome the opportunity to share thoughts and comments on the proposed updates once these have been developed.

Q: Do you have any comments on factors we should consider when reviewing and updating the cost benefit analysis, including the associated valuations documents and its practitioners' guide?

As set out above, natural capital accounting must be fully integrated into the cost-benefit analysis, to ensure that the full range of benefits and impacts on nature and people can be taken into account when assessing improvement options.

We suggest that flood risk is one of the key areas where benefits must be included. Any solutions that prevent spills may also have scope to reduce sewer flooding, and as the Risk Management Authority with responsibilities in this field, water companies are well placed to understand the scope for risk reduction and to factor this into their assessments.

In addition, solutions which prevent water ingress to the sewer system in the first place (keeping rainwater and sewage separate) should be highly valued by the cost benefit analysis process. Such approaches are distinct from storage solutions that hold combined rainwater and sewage back within the system, until it can be later treated. Whilst both routes could deliver reductions in spills and sewer flooding, the latter has few if any additional benefits and so should be disfavoured through the benefits assessment process. By contrast the former can reduce not only the risk of SO spills and sewer flooding but also wider flood risk to communities, such as from Surface Water flooding, and may also have other water quantity benefits such as groundwater recharge and benefit to water-dependent habitats. Such considerations should be factored into value assessments, favouring a holistic approach to water management rather than one which treats rainwater as a problem to be disposed of.

We would welcome the opportunity to share thoughts and comments on the proposed updates once these have been developed.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 86 organisations to protect the natural world. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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This response is supported by the following organisations:

- Angling Trust
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- River Action
- Surfers Against Sewage
- The Rivers Trust
- The Wildlife Trusts