Meeting of:	**Cabinet**
Date of Meeting:	**Thursday, 06 October 2022**
Relevant Scrutiny Committee:	Homes and Safe Communities
Report Title:	Dwr Cymru Welsh Water Consultation on the Drainage and Wastewater Management Plan (DWMP)
Purpose of Report:	To seek Cabinet approval for the Council's response to the above consultation.
Report Owner:	Cabinet Member for Community Engagement, Equalities and Regulatory Services
Responsible Officer:	Miles Punter Director of Environment and Housing Services
Elected Member and Officer Consultation:	Head of Legal and Democratic Services/Monitoring Officer Section 151 Officer
Policy Framework:	This is a matter for Executive decision by Cabinet.

Executive Summary:

- This report seeks Cabinet approval for a Council-wide response to the Dwr Cymru Welsh Water (DCWW) consultation on their Drainage and Wastewater Management Plan (DWMP) for Wales.
- The Drainage and Wastewater Management Plan is a 25-year plan with reviews to be held every 5 years. DCWW's intention is to publish the first cycle of this plan at the end of March 2023, and they are seeking views as part of the consultation process.
- The Plan considers how DCWW intend to manage future challenges brought about by population growth, urban creep and climate change. The Plan sets out DCWWs preferred approach, to maximise the benefits they can deliver for both customers and the environment at the same time. The plan proposes that DCWW will initially concentrate on the places with the worst levels of sewer flooding and the greatest environmental sensitivity.
- The Consultation document contains some 30 questions, most of which are in a closed, yes / no type format. Officers have endeavoured to answer as many questions as possible although some questions are not strictly relevant as they are directed at households. For at least one question, more detail is required than it is possible to provide within the design and layout of the questionnaire, and for this reason it is suggested that a supplementary letter of response be provided to the questionnaire in the name of the Leader of the Council. In addition, Officers will seek meetings with DCWW officials to discuss, in particular, their plans to significantly reduce or

eliminate future untreated sewage discharges into our seas, rivers and local land environments.

- It should be noted that in the Plan, DCWW has not identified the need for additional improvement schemes within the Vale of Glamorgan.
- The deadline for responses to the consultation is 7th October, 2022 and this unfortunately precludes further consideration of the responses by Scrutiny Committees, therefore it is requested that use of the Council's Urgency Procedure is agreed.

Recommendations

1. That Cabinet considers the contents of this report together with the draft consultation responses at Appendix 1 and agrees the same, for submission to Welsh Water Dwr Cymru.
2. That Cabinet agrees the content of the supplementary response letter attached at Appendix 2 to this report.
3. That Cabinet agrees for Officers to engage directly with Welsh Water to encourage ongoing dialogue around future wastewater management and environmental protection.
4. That use of the urgent decision procedure as set out in section 15.14 of the Council's constitution is exercised in relation to recommendations 1-3 above.

Reasons for Recommendations

1. To enable the Council to respond to the Consultation on The Drainage and Wastewater Management Plan from Welsh Water.
2. To ensure that the Council has the opportunity to express its views in detail in respect to the threat of sewage discharges on both land and water environments in the Vale of Glamorgan.
3. To assist in ensuring that the Council's continued interests in reducing and, at some point, eliminating sewage discharges into the local environment are best considered.
4. To enable responses to the consultation to be returned to DCWW by the closure date of 7th October, 2022.

1. Background

1.1 The Drainage and Wastewater Management Plan (DWMP) is Dŵr Cymru Welsh Water's (DCWW) long-term management plan for drainage and wastewater systems in Wales and parts of England. It is a 25-year plan with reviews of the plan held every 5 years. DCWW's intention is to publish the first cycle of this plan at the end of March 2023. The current consultation is non-statutory and led by DCWW to discuss the approach it has taken in this first phase.

1.2 The aim of the plan is to set out how DCWW intends to manage and improve its drainage and wastewater systems in the long-term.

1.3 The plan consists of three levels:

Level 1 – COMPANY OPERATIONAL LEVEL.
Strategic high-level plan covering all of DCWW operational area. Data from level 2 and 3 below will inform the aims and challenges.

Level 2 – STRATEGIC PLANNING UNIT
River basin catchment level, e.g. Tawe to Cadoxton, South-east Valleys. Outline of combined significant identified risks and consultation with relevant stakeholders to explore collaborative opportunities where possible.

Level 3 – TACTICAL PLANNING UNIT
Wastewater Treatment Works(WwTW) catchment levels. e.g. Cadoxton river catchment. Assessments of the risks and opportunities. Long term plan of interventions of specific catchments.

1.4 The primary issues that the plan seeks to address are the long-term challenges surrounding, population growth, urban creep and the reduction of green space, and climate change. Specifically, the plan looks at the:

Removal of surface water from sewerage systems by working with others, e.g. Local Authorities in transitioning to separate foul and surface water sewers;
Improving Combined Sewer Overflows (CSOs);
Reducing nutrients entering rivers;
Using nature based / low carbon solutions;
Reduction in sewer flooding; and
Enabling growth in sewerage catchments that is sustainable.

1.5 The draft plans set out key future trends which have been considered by DCWW to develop the draft DWMP:

Regulatory Changes
The UK Environment Act (2021), and several other regulatory changes which will become law in a post-Brexit Wales by 2025, are likely to bring tighter environmental standards, driving significantly increased monitoring and investment costs.

Increasing customer and stakeholder expectations
Keeping up with accelerating customer expectations around service levels and technology, while ensuring DCWW retain customer and stakeholder trust.

Combined storm overflows (CSOs)
Managing issues of river water quality and pollution, linked to many of DCWW's oldest sewers, which accept rainwater from roads and property and combine it with sewage. CSOs potential impact on the environment will grow with climate change.

Changing climate patterns
The increasing frequency and severity of extreme weather events such as drought and flooding, which affect rivers and other drainage systems that Welsh Water does not manage, together with their sewers.

Environmental responsibility
Managing the impact of DCWWs activities on freshwater biodiversity and ecosystems.

Affordability and potential trade-offs
The constraints of balancing affordability concerns for customers, price caps imposed by regulators limiting necessary investment, and the need to invest in initiatives such as improving infrastructure and environmental protection.

1.6 The plan proposes to demonstrate benefits in relation to creating appropriate plans, making better informed decisions and improving transparency and consistency.

1.7 A number of stakeholders with an interest in drainage and wastewater are involved in the process, e.g.
Local Authorities;
Flood Risk Management Authorities;
Highway Authorities;
Local Planning Authorities ; and
Natural Resources Wales.

2. Key Issues for Consideration

2.1 As part of the consultation, DCWW has produced a detailed questionnaire with 30 questions, and a draft completed version of the questionnaire is included as Appendix 1.

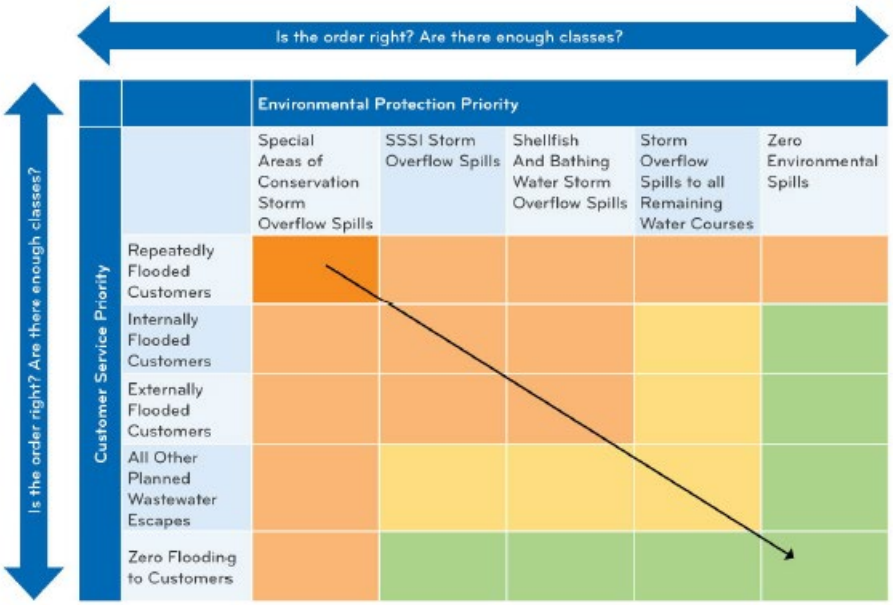
2.2 Whilst every effort has been made to answer each of the questions, there are a number that have not been answered as it is felt that further dialogue and discussions with DCWW are warranted around these particular questions. In particular question 18.

2.3 DCWW has indicated that it needs to invest in the region of £1.29 billion which would facilitate the delivery of 117 projects across Wales to reduce the risk of customer flooding (costing £348 million), and 53 projects to reduce discharges from storm overflows (CSOs) (costing £942 million). The cost of the first scenario would be around £36 per customer every year for the 25 years of our programme. This could result in some increases to customer bills or mean that DCWW would need to curtail some of its other activities to fund this.

2.4 As part of the development of the Plan, DCWW has indicated that it wants to work with stakeholders, and develop joint working groups including Programme Boards, Project Boards and Community Project Boards. The Vale of Glamorgan Council welcomes this approach and in responding to the consultation indicates a willingness to actively participate with DCWW on these boards where appropriate.

2.5 In developing and prioritising schemes for investment, DCWW has used an assessment matrix as detailed in Figure 1.

Figure 1 - DCWW Assessment Matrix



Above: Matrix showing customer service and environmental protection priorities.

2.6 In reviewing the plans it would appear that DCWW has not identified any additional schemes for the Vale of Glamorgan where it would be investing to improve its waste water treatment arrangements in the authority's area , as set out on Page 12 of the DWMP Tactical Planning Catchment Summary for Cadoxton.

2.7 However, the plan does provide details of the funding required for DCWW to maintain their existing performance of CSOs in this catchment area with costs of £55m for a 2030 scenario, increasing to £73m under the 2050 scenario. DCWW classify 'maintain' as a scenario where they will continue to maintain the current level of service within the region and improve the network and address known and emerging risks.

2.8 Whilst it is disappointing that no immediate additional investment is currently projected by DCWW, they have used the above matrix to identify future priorities. This has resulted in them concentrating on the places with the worst levels of flooding, and those areas which are the most environmentally sensitive from the effects of storm overflows first, in line with above matrix.

2.9 An area of concern which the Council feels needs to be highlighted to a greater extent is the potential impacts from combined storm overflows (CSOs) and their impact on local bathing water quality. The importance of recreational bathing waters in encouraging healthy lifestyles for people is of paramount importance to the Council and we will continue to promote active and healthy choices

through leisure and cultural activities. The land and water environments are one of our greatest assets and we are committed to protecting and enhancing them for future generations. We are very conscious of the fact that health and well-being are inextricably linked with the quality of the local environment.

2.10 High quality bathing waters can contribute to a sense of ownership and pride of place for local residents and communities. Beaches also offer an ideal environment for children and adults to learn about coastal environments, giving rise to educational benefit. It should be noted that the primary sources of pollution at bathing waters are:

Pollution from sewage – bacteria from sewage can enter waters as a result of system failures or overflows or directly from sewage works;

Water draining from populated areas - water draining from urban areas following heavy rain can contain pollution from a variety of sources, including animal and bird faeces;

Domestic sewage – misconnected drains and poorly located and maintained septic tanks can pollute surface water systems;

Water draining from farms and farmland – manure from livestock or poorly stored slurry can wash into rivers and streams resulting in faecal material entering the sea; and

Animals and birds on or near beaches - dog, bird and other animal faeces can affect bathing water as they often contain high levels of bacteria (much higher than treated human waste).

2.11 Anecdotal evidence suggests that the primary impacts on the bathing waters in Barry are affected by weather and due to the urban catchment where the water quality could be impacted by storm overflows and urban diffuse pollution such as road run-off and misconnected drainage.

2.12 The following table summarises recent Bathing Water Quality for the four Designated Bathing Water beaches in the Vale of Glamorgan up to 2021[1].

Bathing water	2018	2019	2020	2021
Barry's Cold Knap	Excellent	Excellent	Excellent	Excellent
Whitmore	Good	Excellent	Good	Good
Jackson Bay	Sufficient	Good	Sufficient	Sufficient
Southerndown	Excellent	Excellent	Excellent	Excellent

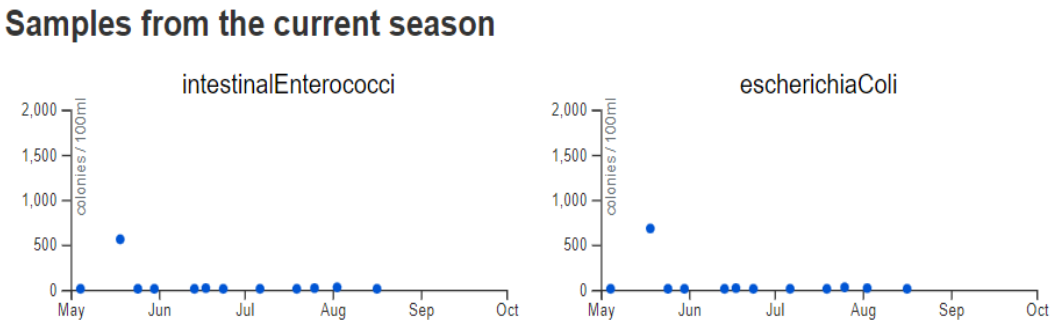
[1] In 2022 two additional beaches, namely Penarth and Llantwit Major have been designated as Bathing Waters following applications to the Welsh Government.

2.13 The impact that pollution incidents have upon Bathing Water Quality and Blue Flag status cannot be overstated, as even one sample with elevated bacteriological contamination will impact the classification for the following season.

2.14 The purpose of the bathing water classification is to represent 'the relative risk to the average bather on an average bathing-season day', using a nationally consistent description which corresponds to a specific 'probability of contracting a gastrointestinal illness' during a typical bathing visit. An 'excellent' classification corresponds to a probability of less than 3%. The classification applies for the duration of current bathing season and is re-calculated before the next season, based on water quality monitoring undertaken over the previous four seasons. The standards use two microbiological parameters, E. coli and intestinal enterococci, and are based on 95th and 90th percentile values.

2.15 The results to date for the 2022 season for Whitmore Bay are detailed below in Figure 2 as published by NRW[2]. These results will be considered with the preceding 3 years data to calculate the 2023 classification, but it is anticipated that owing to the one elevated result in May, that the classification will remain as 'Good' and thus prevent Whitmore Bay from obtaining Blue Flag Status for the 2023 bathing season.

Figure 2 - Summary of Bathing Water Samples Whitmore Bay 2022



2.16 As part of the Replacement Local Development Plan, a draft Integrated Sustainability Appraisal (ISA) has been produced and is currently out for consultation[3]. This draft ISA, identifies the need to maintain good water quality as a key issue and an objective of the ISA is to conserve, protect and enhance the water environment, water quality and water resources across the authority.

2.17 As such the Council is committed to working with DCWW's ambition to improve drainage and wastewater management throughout the county thereby reducing the likelihood of pollution incidents to protected habitats, SSSIs and bathing waters.

[2] https://environment.data.gov.uk/wales/bathing-waters/profiles/profile.html?site=ukl2202-36200
[3] https://www.valeofglamorgan.gov.uk/en/living/planning_and_building_control/Planning/planning_policy/Integrated-Sustainability-Appraisal.aspx

2.18 Whilst the bathing waters within the Vale of Glamorgan are not specifically mentioned in the DCWW Plan, the Council will seek to work in a collaborative manner with DCCW and NRW, regarding the ongoing issues. Where feasible it will ensure that future investment and improvements in local DCWW assets is considered to ensure that pollution incidents are reduced and bathing water quality in the area maintained and ideally enhanced.

2.19 In addition officers believe that the closed nature of certain important questions in the questionnaire, in particular question 18, does not allow the Council to properly articulate just how important significantly reducing or eliminating future sewage discharges into our rivers and seas is to residents of and visitors to the Vale of Glamorgan. It is therefore suggested that a supplementary letter is sent to DCWW to accompany our questionnaire response, detailing our views. This letter is attached at Appendix 2.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

3.1 There are clear synergies between this consultation and many of the Five ways of Working, with particular relevance to collaboration. Local Authorities have well established collaboration arrangements across various footprints and functions. Up until now, this Council has very much focussed its approach around collaborating where it makes sense to do so and where it adds value.

3.2 This consultation provides an ideal opportunity for the Council to work directly with DCWW and other stakeholders, namely NRW and Welsh Government on improving future drainage flooding and pollution issues, to ensure the environment and bathing waters in the authority are protected and improved.

4. Climate Change and Nature Implications

4.1 The DWMP Plan has considered future trends, such as climate change, and it sets out an approach of how Welsh Water will work together with partners to plan for the future and identifies options for the sustainable management of drainage and sewerage services.

4.2 The DWMP will therefore be vital to help the Council meet one of its key Climate Change challenges which is to reduce the risks from flooding as in the Project Zero Climate Change Plan.

5. Resource and Legal Considerations

Financial

5.1 The consultation and Council's response has no direct financial or legal implications for the Authority.

Employment

5.2 The consultation has no direct employment considerations for the Council.

Legal (Including Equalities)

5.3 There are no immediate legal implications associated with this report.

Background Papers

DCWW Main Plan https://www.dwrcymru.com/-/media/Project/Files/Page-Documents/Our-Services/Wastewater/DWMP/English/The-Main-Plan.ashx

River Basin Catchment Summary Tawe to Cadoxton https://www.dwrcymru.com/-/media/Project/Files/Page-Documents/Our-Services/Wastewater/DWMP/English/Locations/Tawe-to-Cadoxton.ashx

River Basin Catchment Summary South East Valleys https://www.dwrcymru.com/-/media/Project/Files/Page-Documents/Our-Services/Wastewater/DWMP/English/Locations/South-East-Valleys.ashx

DRAFT

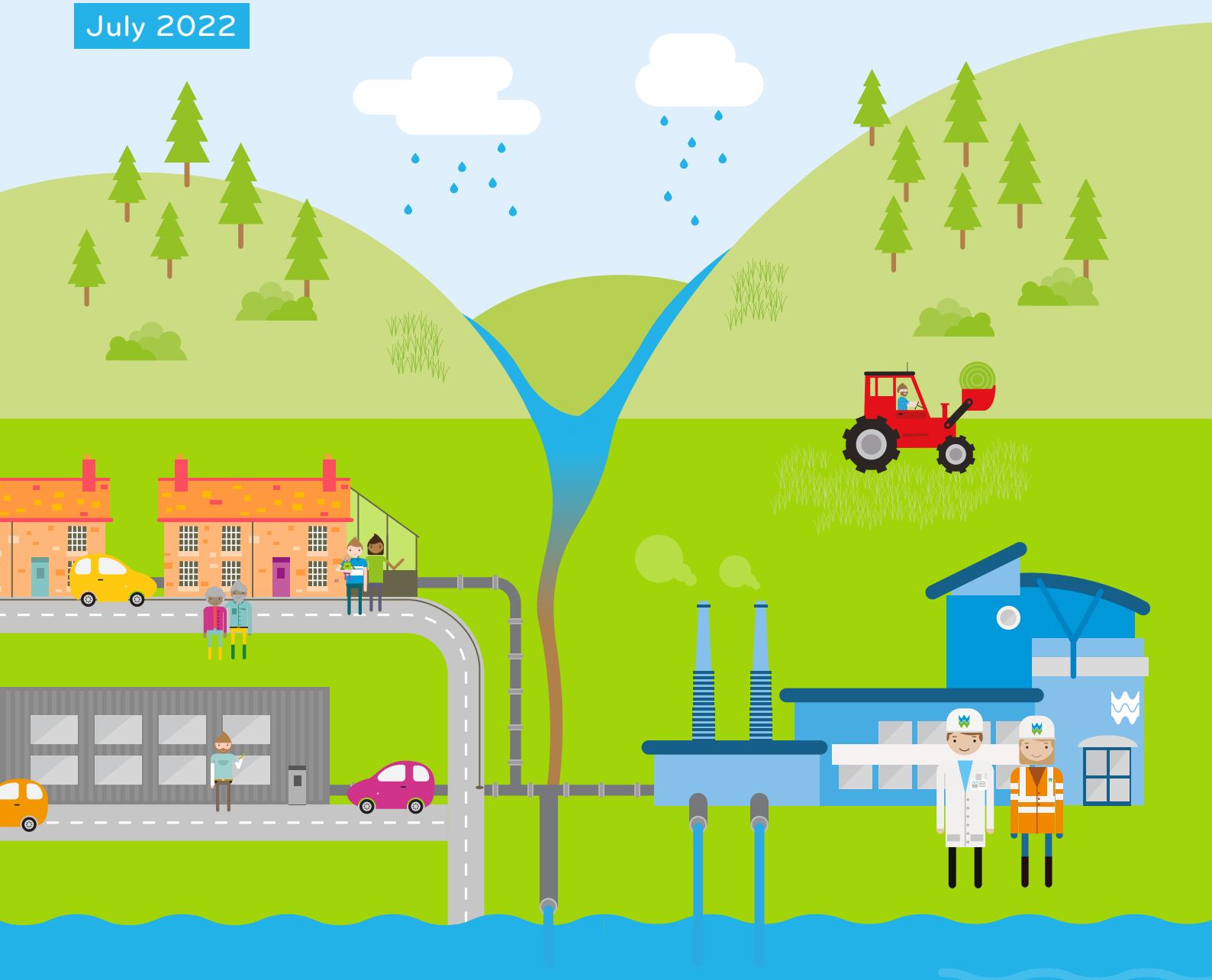
DRAINAGE & WASTEWATER MANAGEMENT PLAN

Dwr Cymru Welsh Water

Introduction to the Draft Drainage and Wastewater Management Plan 2024

Public Engagement Feedback Form: Stakeholders and Regulators

July 2022



IN PARTNERSHIP WITH

rps ATKINS Member of the SNC-Lavalin Group wsp

Dŵr Cymru Welsh Water would like to hear your thoughts and feedback on our Drainage and Wastewater Management Plan (DWMP)

The DWMP is a long-term planning study which identifies our urban drainage, wastewater and sewerage needs over the next 25 years.

With this plan, Welsh Water combines previous methods of sewerage planning with the latest regulations and outlines how it will meet the requirements of the Welsh and UK governments to respond to the socioeconomic and environmental challenges of population growth, urban creep, and climate change.

> A drainage and wastewater management plan (DWMP) will set out how water and wastewater companies intend to extend, improve and maintain a robust and resilient drainage and wastewater system. The plan must take a long-term view ... with a minimum period of 25 years. The framework for DWMPs has been developed in response to the need to improve the approaches taken by the water sector to long-term drainage and wastewater planning with a view to providing greater transparency, robustness and line of sight to investment decisions that lead to cost to customers.
>
> *Water UK, September 2021*

The DWMP is a framework for developing a shared vision for environmental water quality, drainage, and wastewater management. Ultimately, the DWMP is a plan driven by the water company for the benefit of the environment and customers in Wales and adjacent regions of England.

The DWMP will cover the following:

- How we intend to manage future challenges to the operation of our assets, in response to three principal threats: population growth, urban creep and climate change.
- How we intend to extend, improve, and maintain drainage and wastewater systems across the company area.
- How we will plan for the long-term, with proposals for investment that are relevant to the risks we face over a minimum of 25 years, to 2050.
- How we demonstrate greater transparency, robustness, and line of sight for investment decisions that affect our customers.

The DWMP is a blueprint for achieving the strategic vision which we set out in our Welsh Water 2050 document. This document sets out 18 strategic responses which outline how we intend to respond to future trends that are likely to have a significant impact on the delivery of our service. They cover a range of areas, including wastewater, customers, communities, and the environment. The DWMP is a best practice response to these, based on established processes, such as Water Resources Management Plans (WRMP) and Sustainable Drainage Plans (SDP).

This first version of the DWMP is referred to as 'Cycle 1'. Some key elements of the plan have been developed in this cycle whilst other areas are still being developed. Trials will be conducted during this phase, and best practices will be drawn and then incorporated into future cycles. Those cycles are expected to align with the 5 yearly Price Review (PR) cycle, through which we are funded.

Services Covered by The Plan

DWMPs will examine wastewater networks (foul, combined, and surface water), interconnections with 3rd party and privately owned drainage systems, Wastewater Treatment Works and the effects on the waters we discharge to (i.e., rivers, streams, groundwater, estuaries, and coastal waters).

The DWMP is designed as a single overarching plan for the management of sewerage and drainage. However, these two aspects are distinct and require subtly different consideration.

Sewerage (foul, combined and surface water) – how to collect, transport, treat and return it to the environment.

Drainage – how to manage other drainage networks that impact our wastewater system across a geographical area

To consider both sewerage and drainage elements the DWMP looks at future trends and embeds an approach of working together with others to plan and identify solutions.

Wastewater Affects Everyone

You may be asking yourself how this work may affect you, or why you should read on to find out more; the answer is simply that wastewater affects everyone. One of the most important things that we do to protect public health at Welsh Water is taking away wastewater from homes, business, and communities so it can be treated and safely returned to our rivers and the sea.

We all use water every day to drink, cook, clean, bath and flush the toilet. Many of us enjoy living by the sea, fishing, or relaxing near canals and rivers. Clean water is also important for running businesses; without it, restaurants can't supply food and drinks, hospitals can't perform vital operations or clean equipment and fire services can't put out fires. It's also vital for farming because without it, you can't grow grass and crops or clean and sustain livestock.

Ensuring we have a clean water supply depends heavily on the way we manage drainage and wastewater. As the demand for clean water continues to go up, the amount of untreated sewage from homes and businesses will go up too. The way we manage this is important as it will shape the future well-being of Wales and the environment that we all share. It will also play a key role in meeting growing demand for water and supporting more sustainable industry and farming.

Find out more about the importance of drainage and wastewater to our lives by checking out our e-learning course.

How to Provide Your Feedback

Each survey is classed as one consultation response. If you are completing this form on behalf of another person or group of people, please submit separate feedback forms to help us analyse your feedback.

The consultation will run for 10 weeks starting on 27 July and closing on 7 October 2022 at 4pm.

1. Complete our consultation feedback questionnaire online at **https://www.dwrcymru.com/en/our-services/wastewater/drainage-and-wastewater-management-plan**
2. Complete the PDF version of the consultation feedback questionnaire below and email it to **DWMP@Dwrcymru.com**
3. Return a printed version of the consultation feedback questionnaire below by post to **Mr Steve Wilson, Dŵr Cymru Welsh Water, Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT**

Finding Out More About The DWMP

As well as the DWMP itself, we have published a number of documents that will provide you with information to help inform your response to the questions below, including:

- Virtual exhibition
- E-learning course
- Customer summary
- Technical summary
- Non-technical summary
- Area summaries

You can view these documents online at **https://www.dwrcymru.com/en/our-services/wastewater/drainage-and-wastewater-management-plan.** If you need a paper copy of the DWMP or of this brochure, please email us at DWMP@dwrcymru.com

Data privacy notice

Welsh Water is committed to protecting your personal information. Whenever you provide such information, we are legally obliged to use it in line with all applicable laws concerning the protection of personal data, including the UK General Data Protection Regulation (GDPR).

How will Welsh Water use the information we collect about you?

We will use your personal data collected via this consultation for a number of purposes, including:

- to analyse your feedback to the consultation
- to produce a Consultation Report, based on our analysis of responses (individuals will not be identified in the Report)
- to write to you with updates about the results of the consultation and other developments
- to keep up-to-date records of our communications with individuals and organisations

Any personal information you include in this form will be handled and used by (or made available to) the following recipients to record, analyse and report on the feedback we receive:

- Welsh Water
- WSP

What rights do I have over my personal data?

Under the terms of the UK GDPR you have certain rights over how your personal data is retained and used by Welsh Water. For more information, see our full data privacy statement on our website.

1. Under GDPR legislation, we cannot accept consultation responses from people under the age of 13.

[x] Please tick this box to confirm that you are aged 13 or older.

2. Are you responding as a stakeholder, local representative group, customer or regulator? (please tick only one box)

- [x] Stakeholder responding on behalf of an organisation
- [ ] Personal response as an informed individual
- [ ] Local representative group
- [ ] Customer of Welsh Water
- [ ] Customer of other water company
- [ ] Regulator

Consultation period (27 July - 7 October 2022)

3. If you are responding on behalf of an organisation or interest group, please write the name of that group below

Vale of Glamorgan Council

4. Have you heard of Welsh Water's DWMP before?

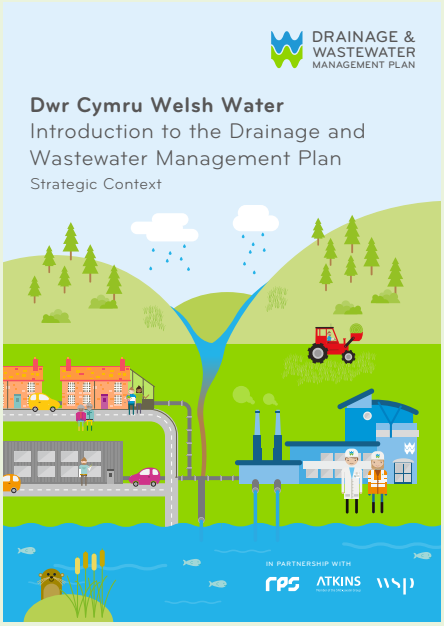
[x] Yes [ ] No [ ] Don't know

5. If so, how did you hear about it? (tick all that apply)

- [ ] Attended presentation
- [x] Received an email
- [ ] Visited the website
- [ ] Completed the e-learning course
- [ ] Other (please specify) _____

6. How often would you like us to engage with you about the DWMP in future cycles?

- [x] At key milestones of the Plan, i.e. as the Risk, Options and Programme Development stages are completed (three updates every five years)
- [ ] Annually (five updates every five years)
- [ ] Once a cycle (once every five years)



As part of introducing everyone to the first Plan we created summary documents and published them on our website. We have created the 'Strategic Context' document and the 'How and where we want to work with you' document. We plan to continue developing documents for the remaining stages of the Plan; Opportunities, Options and Programme; along with 'What we have developed and when we plan to deliver them'.

7. If you have read these documents, did you find them useful?

- [x] Yes
- [ ] No
- [ ] I couldn't access them
- [ ] Don't know

8. Would you like us to continue using them to update you?

- [x] Yes
- [ ] No
- [ ] Don't know

9. When we make updates to our documents or website, how would you like to be informed? (please tick all that apply)

- [ ] Twitter
- [ ] Facebook
- [ ] Water bill
- [ ] Posters in libraries or supermarkets
- [ ] Roadshows in supermarket car parks or town halls

The Stages of the DWMP

There are five stages to the DWMP:

1. Objective setting – Identifying the big issues faced now and in the future, as well as actions to address them.

2. Risks assessment – Outlining information about drainage and wastewater issues that are already being experienced or have been identified. It will also analyse current and future risks and their causes.

3. Options development – Outlining the process of developing solutions to address the risks and their degree of uncertainty.

4. Programme appraisal – Combining solutions into a plan that gives the best value to customers, communities, the environment, regulators and government.

5. Consultation period – Public consultation of the draft DWMP, which will involve extensive public consultation with customers, stakeholders and regulators.

10. In terms of the stages of the DWMP when would be the most meaningful time for your organisation to contribute?

The Vale of Glamorgan Council would welcome the opportunity wot work very closely with DCWW from the outset of developing the DWMP, as we recognise the strategic importance this plan has in relation to future drainage, flooding and pollution management. Thus we welcome early engagement with DCWW to ensure that where possible we can align our corporate objectives to ensure a desirabe outcome in improving drainage/ flooding issues and protecting the environment and bathing waters.

11. If you were willing to help us reduce the amount of rainfall that enters our sewers, would you consider introducing any of the following three measures? (tick all that apply)

- [ ] Permeable surfaces for driveways
- [ ] Installing water butts to collect and reuse rainwater
- [ ] Installing sustainable drainage systems around your home to manage rainwater and natural drainage locally

12. Do you agree that we should deliver customer education campaigns to give advice in local areas prone to blockages caused by items from the list below?

- **Baby wet wipes (flushable)**
- **Cotton pads**
- **Sanitary products**
- **Nappies**
- **Paper towels and tissues**
- **Medication**
- **Oils, fats, and greases**

- [x] Yes
- [ ] No
- [ ] Don't know

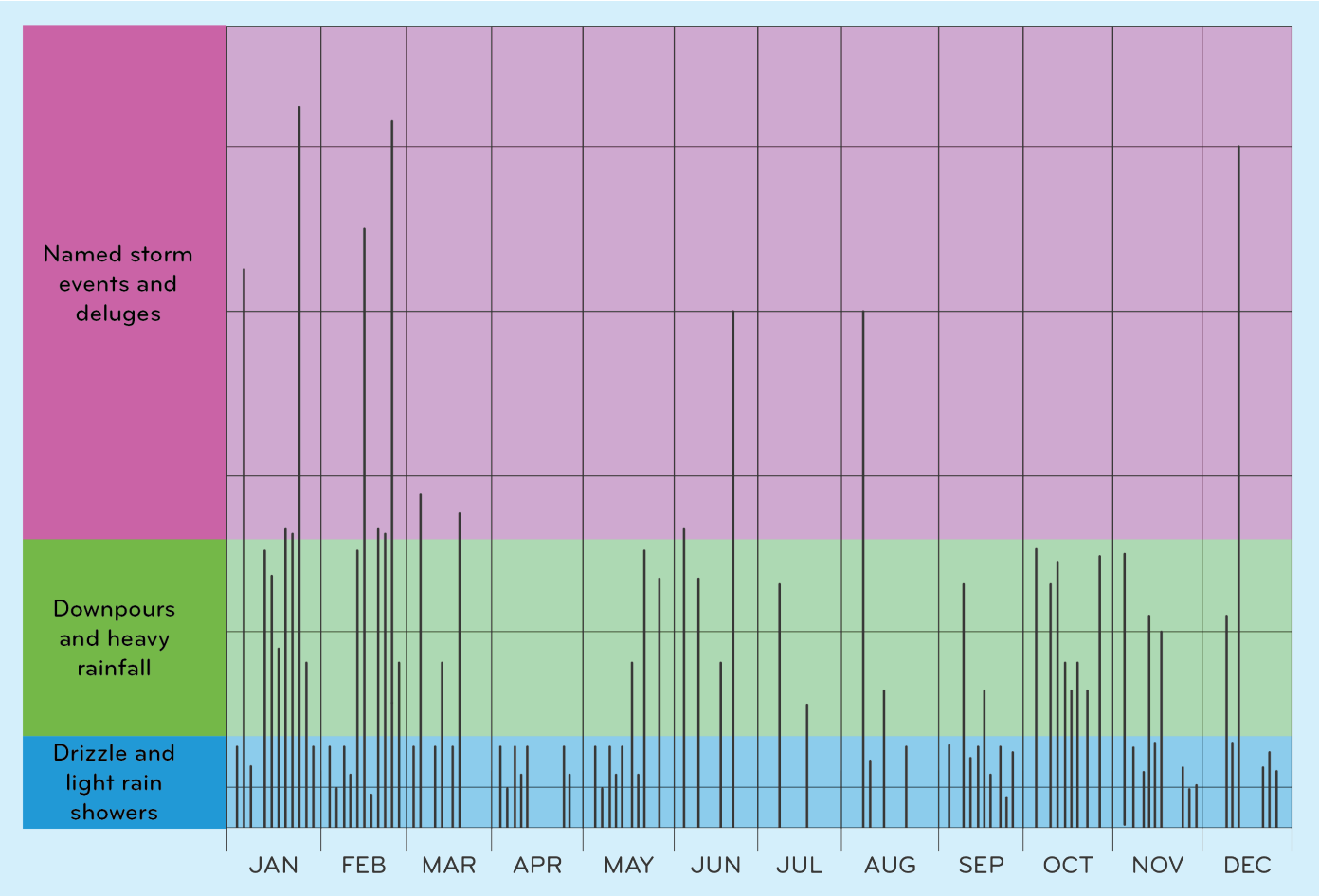
Objective Setting

As part of the Plan, we have created planning objectives which measure risk across the different areas where we operate, and to feed into the development of options. By options, we mean steps which we will take, both now and in the future, to meet these objectives and address the key challenges we face including climate change and a growing population.

Our objectives are made up of national standards to allow for industry comparison, together with locally focused objectives which are tailored to the needs of stakeholders and customers. Our planning objectives have three key themes: water quality, water quantity and resilience.

The graph below shows three areas of rainfall and a separation of the type of rainfall that occurs in that zone. Our intention is to develop plans for all areas but to set the milestones to be achieved at these rainfall events.

The solutions in each zone can also be very different, for example, in the blue zone it is appropriate to build capacity into the sewer, as this zone refers to containment of sewage with a small amount of rain. In the Green area we assume that sewage is being contained but it's the combined heavy rainfall that needs to be managed by re-routing it back to nature. In the pink area, when there are named storms, these are events that become an emergency, such as Storm Dennis and we need to put in place plans to return to a normal service as soon as possible by working with the emergency services.



13. **Do you support the principle of managing wastewater separately to sewerage?**

- [x] Yes
- [ ] No
- [ ] Don't know

14. **Do you agree with setting targets for managing sewage and rainfall? i.e. contain sewage and rainfall (the Blue zone), re-route to back to nature rainfall (the Green zone) develop plans to get the service back to normal as fast as possible after a named storm such as Storm Dennis.**

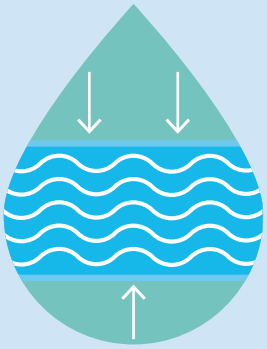
- [x] Yes
- [ ] No
- [ ] Not sure

15. **If you would like to make any further comments, please use the box below:**

Risk Assessment

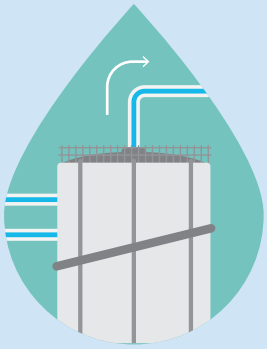
After assessing current demand and capacity of the drainage and sewerage network, we can next look at risks which we need to consider throughout the development of the Plan.

Our measures are made up of national standards to allow for industry comparison, together with local measures which are tailored to the needs of stakeholders and customers. Our measures have three key themes: **water quality, water quantity and resilience** as shown below.



Water Quantity
Reduce the risk of (internal and external) flooding to communities

Water Quality
Management of our water quality, services and the environment



Resilience
Adaptiveness to change while maintaining critical services and protecting the environment

We have looked at a range of different areas as part of an overall assessment of risk:

- **A 'risk screening' process** to identify areas most at risk now and where we need to focus most of our efforts.
- **Baseline Risk and Vulnerability Assessment** - A tool to bring together different elements and help us consider what the key problems are both now and in the future.
- **Characterising problems** which we need to solve in terms of how complex they are.

16. Should we be investing in additional capacity in our sewers to provide time to react when something goes wrong?

- [x] Yes
- [ ] No
- [ ] Don't know

Options Development

The option development stage of the Plan sets out the scope, cost and likely timing of different options, which could be put in place to help us meet our long-term objectives. It looks at the value of different options - not just in terms of the cost; but also looking at other areas such as the likely impact on flooding and pollution, together with wider benefits which may be delivered for local people and nature.

We have started with a long list of options and, through a series of steps, shortened this down to the best value, preferred options that could address the risks we have identified. Through each step of the option development process, we have gone into more detail and considered more assessment criteria to further shorten the list.

17. Do you agree that we should prioritise customers who experience the most frequent sewer flooding over highway sewer flooding?

- [x] Yes
- [ ] No
- [ ] Don't know

18. Do you agree that we should prioritise the most environmentally sensitive areas over bathing waters?

- [ ] Yes
- [ ] No
- [ ] Don't know

Growth, urban creep and climate change are creating added pressures on our network. All these pressures are happening at different speeds across the whole operating area, which means that we need to carry out improvements and investments in more places, more often. We need to choose if we should make more small interventions in a wider area, or fewer interventions with greater benefit in a smaller number of areas.

Storm Overflows

Storm overflows, or combined storm overflows (CSOs), are designed to operate when it's raining, or shortly after, to help the sewerage system cope. They provide pressure relief and protect customers from flooding by allowing the excess rainfall and sewage spill to go to the nearest water course. They typically have a limited environmental impact, but some are now operating regularly throughout the year, not just during heavy rainfall events as they were initially designed for.

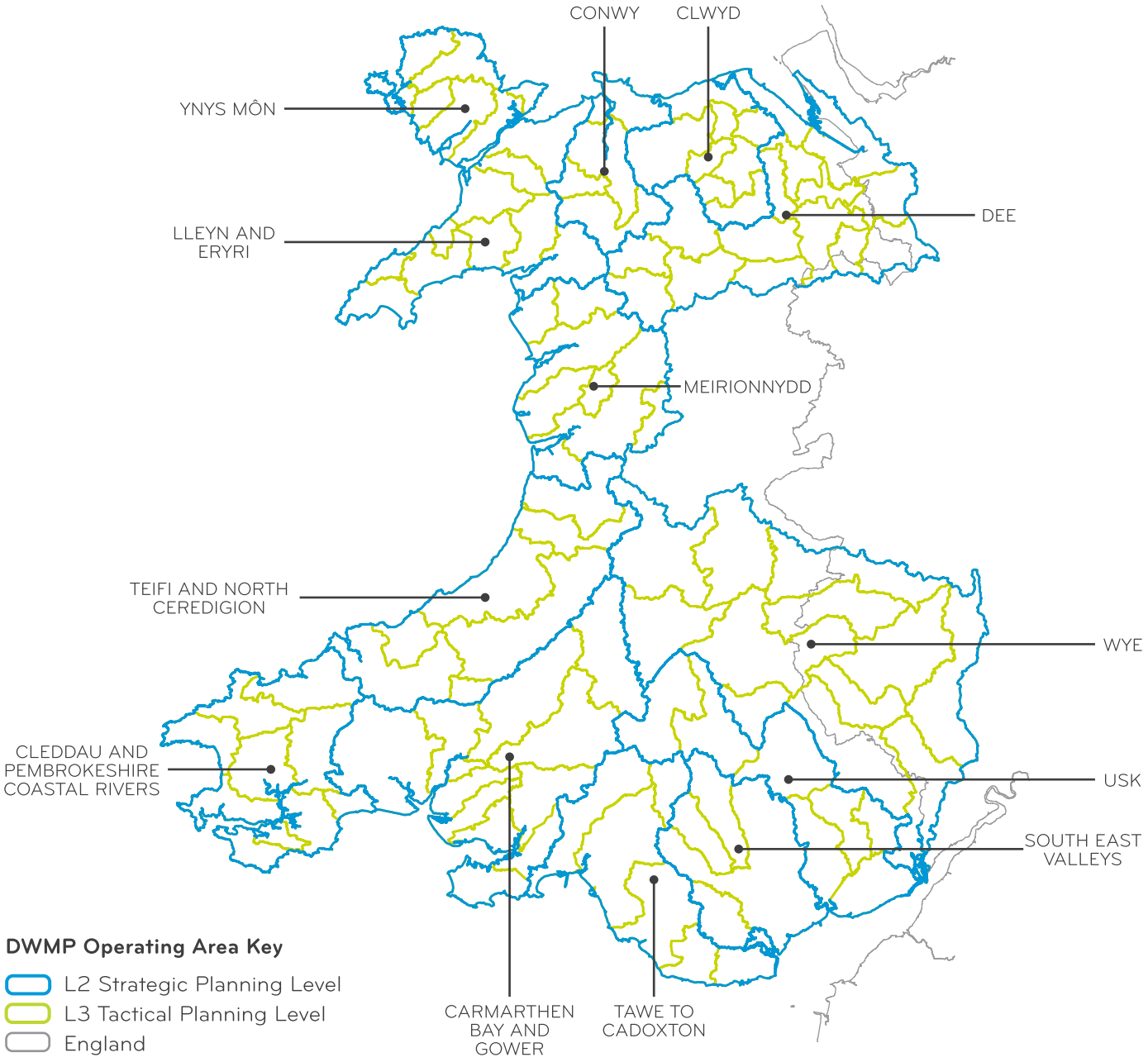
This highlights the need to review how storm overflows currently work, their impact on the environment and whether they meet the needs of today and tomorrow. This is considered as part of the Plan.

Incremental steps to the 'Final Environmental Destination'

- A short summer rainstorm with CSOs in compliance and no flooding internally or externally
- A drizzle with CSOs in compliance and no flooding internally or externally
- A downpour with CSOs in compliance and no flooding internally or externally
- A deluge with the CSOs in compliance (our legal requirement) and no flooding (internal or external)
- A named storm with only emergency spills or floods.

(Please note we are limiting the assessment in this cycle of all of the above to 60 minute storms only)

Complete our e-learning module to find out more about the possible impact of growth, urban creep and climate change in the next 25 years



Given that Welsh Water has 106 Level 3 areas, each with varying degrees of risk related to storms, we recognise that to achieve a greater resilience to worst case storms will cost more money than achieving a lower resilience to average storms. By choosing a lower resilience we can make an improvement in more areas. And once we've completed this incremental improvement we will be moving on to the next incremental improvement – through the blue, green and pink zone, i.e. storms with less and less likelihood of occurrence.

19. In your opinion, which should we prioritise?

- [x] Protecting a wide area against the impact of storms in an average year
- [ ] Protecting a smaller number of areas against the impact of a less frequent, but more severe storm

Added Value

We have looked at the least cost options first. We then compared this list with the environmental and social benefits that the different options bring over both a 5- and 25-year plan period.

We have created both a traditional and a sustainable solution. We have compared the benefits from each and chosen a sustainable solution where it is either least cost or close to the least cost traditional solution. Where the sustainable solution is not close to the traditional solution in cost, we have chosen the traditional solution.

BY ENVIRONMENTAL BENEFITS we mean anything that relates to the environment – this could include rivers, coastlines, and natural habitats. By social benefits we mean anything that relates to people and people's activities – this could include preventing flooding of homes and businesses.

The most environmental harm takes place when rivers and streams are at their lowest levels, usually in the summer. This is also when the weather is dry so people are more likely to be walking, fishing, swimming or kayaking near the water and the amenity importance of the river or stream is at its greatest.

By least cost we mean the list of solutions that when compared to each other are ranked in order of their cost. Versus an Environmental and Social Cost we mean the list of solutions that when compared to each other are ranked in order of the environmental and social benefit.

20. Do you agree with our approach to prioritise the most beneficial and sustainable options unless the costs are excessive?

☐ Yes ☐ No ☒ Other (please specify)

Ultimately the Council would agree that prioritsing options with the most benefits and the most sustainable option is a pragmatic approach. . The Council would expect that for each option robust business cases would be developed setting out these priorities against the costs to enable DCWW to make the most appropriate investment.

Programme Appraisal

As part of the Plan, each area that we cover has a list of drainage and wastewater solutions that we could introduce to improve the service in that area.

These lists are brought together to form the overall programme.

We then evaluate the programme as a whole, to produce a prioritised list of solutions in an order of greatest cost benefit.

21. We have chosen our best value schemes and have ranked these schemes by environmental benefit. Do you agree with this approach?

- [x] Agree
- [ ] Disagree
- [ ] Don't know

22. If you disagree, how would you prefer us to create the programme, e.g. least cost?

Engagement

The Plan will only reach its full potential in delivering a robust and resilient drainage and wastewater service if we work together with key stakeholders both nationally and locally. By working with others, we can help raise awareness of the plan with customers and stakeholders. We can also work across different organisations to deliver improved, and more sustainable, drainage and flood management.

Our aim is to set up 13 Project Boards to work as enablers between Programme Boards and Community projects to agree resources plans and build business cases.

Programme Boards

Manage joint funds and agree programmes of work.

Project Boards

Work as enablers between Programme Boards and Community Projects to agree resource plans and build business cases.

Community Projects

Work with Project Boards to develop and implement solutions to local pollution and flooding issues.

23. We are interested in talking to the community about flooding and pollution. If you are interested in one of our team coming to speak at your community group, please put the name and contact details of the group in the space below.

The Vale of Glamorgan Council welcomes the opportunity to discuss issues around flooding and pollution with DCWW, and would look to engage more closely with DCWW on these issues

24. Would you like us to trial the following initiatives in Cycle 2? (tick all that apply)

- [x] Community project
- [x] Talks to community groups
- [x] Community Project Management Group
- [x] Citizen Science Project
- [ ] Other _____
- [ ] None of the above

25. Do you agree with our recommendation to set up a community Board trial in each of the river catchment areas?

- [x] Agree
- [ ] Disagree
- [ ] Don't know

26. If you disagree, how do you think community Boards should be set up?

Proposal for Cycle 2

The current approach to planning is based on cost benefit and planning trajectories, where we have a large number of conflicting objectives that are competing for funds.

As an example, internal sewer flooding has a company target that Ofwat is willing to fund to achieve but that's in conflict with another objective which says you need to reduce spills from storm overflows, which in turn is in conflict with another target that states we need to protect customers from a severe storm.

This approach works for short-term business planning but is very complicated and costly to carry out for plans over 25 years.

Our preferred approach is based on improving the minimum level of service using a customer and environmental destination combined, i.e. to reduce pollution and flooding.

Customer destination is a time in the future when customers will no longer have flooding from sewage inside their homes that is due to a lack of capacity in the sewer network.

Environmental destination is a time in the future when our rivers and seas receive treated flows from our sewerage system at a quality that is protective of for biodiversity and ecology.

Our intention is to establish the level of service of each river and community in terms of the four levels of service below. We then plan to incrementally improve each river and community through the levels.

1. We can contain sewage in the pipework consistently on days when there is no rainfall
2. We can contain sewage in the pipework consistently on days when there is a short, sharp rain shower during the summer
3. We can contain sewage in the pipework consistently on days when there is a number of hours of drizzle
4. We can contain sewage in the pipework consistently on days when there is a heavy rainfall for a couple of hours

27. Do you agree with this incremental approach to improvements?

- [x] Yes
- [ ] No
- [ ] Don't know
- [ ] Not applicable

We've presented two choices, which are:

1. Our preferred approach is to progressively reduce risk in the following way:

   A. Gradually improve all areas slowly over time by increasing overall capacity in the network (pipes).

   B. Tackle smaller 'worst risk' areas first to achieve future government policy in those areas one step. Other areas with better performance would not be improved until later.

2. To carry on the way we have been doing with tackling discrete problems in isolation.

28. Which of the two choices listed above do you prefer?

- [x] Choice 1: Incremental (preferred approach)
- [ ] Choice 2: Standard approach

Anything Else?

29. Do you have any further comments about our proposals that you wish to provide?

About You

30. If you are are responding from an organisation, please let us know which organisation you are representing

Vale of Glamorgan Council

We would be grateful if you could please provide your details so that the age range and diversity of respondents can be captured as part of our consultation.

We will use the information we receive to help understand whether our consultation has been useful to people of different backgrounds and requirements.

We may publish a summary of the results, but no information about an individual would be revealed.

The answers you provide to these questions are defined as 'special category data'. If you agree to provide Inclusion and Diversity Information, you can withdraw your permission at any time. To withdraw your details, **please contact us via email at DWMP@dwrcymru.com or write to us at Mr Steve Wilson, Dŵr Cymru Welsh Water, Linea, Fortran Road, St Mellons, Cardiff, CF3 0LT**

If you are a customer, please answer the following three questions.

31. Age group (please tick):

- ☐ 13-17
- ☐ 18-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65-74
- ☐ 75-84
- ☐ 85+
- ☐ Prefer not to say

32. What is your gender?

- ☐ Male
- ☐ Female
- ☐ Non-binary
- ☐ Prefer not to say

33. What is your ethnic group?

- ☐ Asian or Asian British includes Indian, Pakistani, Bangladeshi, Chinese or any other Asian background
- ☐ Black, Black British, Caribbean or African includes Black British, Caribbean, African or any other Black background
- ☐ Mixed or Multiple ethnic groups includes White and Black Caribbean, White and Black African, White and Asian or any other Mixed or Multiple background
- ☐ White includes British, Northern Irish, Irish, Gypsy, Irish Traveller, Roma or any other White background
- ☐ Other ethnic group includes Arab or any other ethnic group

If you have any difficulties completing this feedback form or accessing the consultation documents, or require the documents in an alternative format, please contact the project team via the contact details below.

Dŵr Cymru
Welsh Water

DWMP@dwrcymru.com

www.dwrcymru.com/dwmp

Date/Dyddiad 6 October, 2022

Ask for/Gofynnwch am Executive Leader and Cabinet Member for Performance and Resource

Telephone/Rhif ffôn (01446) 700111

Fax/Ffacs

Your Ref/Eich Cyf

My Ref/Fy Nyhyf

e-mail/e-bost

The Vale of Glamorgan Council
The Alps, Wenvoe CF5 6AA

Cyngor Bro Morgannwg
Yr Alpau, Gwenfô CF5 6AA

www.valeofglamorgan.gov.uk
www.bromorgannwg.gov.uk

Steve Wilson
Managing Director of Wastewater Services,
Developer Services & Energy
Dwr Cymru
Fortran Road,
St Mellons,
Cardiff,
CF3 0LT

Dear Mr Wilson,

RE: Dwr Cymru Welsh Water's Consultation on the Drainage and Wastewater Management Plan (DWMP)

Firstly, thank you for the opportunity to contribute to your Wastewater Management Plan. The Council has returned our completed questionnaire with our responses approved by the Council's Executive at its meeting of 6th October 2022, in recognition of the importance of your management of waste water to our local environments.

The purpose of this letter is to enable the Council to provide a more detailed response, primarily in relation to Question 18 which asks the following:

18. Do you agree that we should prioritise the most environmentally sensitive areas over bathing waters?

The Council fully appreciates the need to protect environmentally sensitive areas, such as SACs, SSSI and protected habitats. However, for the Vale of Glamorgan our designated bathing waters are of particular importance, and therefore it was difficult to answer the question in suitable detail owing its closed nature.

As I am sure you will be aware the beaches in Barry are potentially impacted by numerous storm, emergency and surface water outfalls, both along the foreshore and within the freshwater streams and watercourses, particularly during heavy rainfall.

Whilst the Council recognises the importance of the storm overflows to protect domestic properties in the Vale of Glamorgan from being flooded by sewage during periods of heavy rainfall, we are also acutely aware that said overflows can result in a deterioration in the quality of the water in the River Cadoxton and Barry bathing waters.

Whilst it is appreciated that in recent years, telemetry equipment has been installed in all the overflows, which enables DCWW to respond to warnings of blockages in the sewerage system and has reduced the number of actual spills, the Council was disappointed that the DWMP has not identified any additional investment schemes for Cadoxton which could look to further improve the performance of the CSOs and reduce the impacts on our bathing waters.

As detailed in our Cabinet Report that approved our Consultation response, the impact that pollution incidents have upon Bathing Water Quality and Blue Flag status cannot be overstated, as even one sample with elevated bacteriological contamination will have the potential to impact the classification of the Bathing Waters for the following season. This is particularly an issue at Whitmore Bay where the Blue Flag status has not been achieved owing to the bathing water only being classified as Good and not Excellent.

Whilst the Council commends the overall commitment from DCWW in developing the DWMP to achieve the best outcome for the environment and your customers, we would welcome further opportunity to discuss concerns around the continuing use of the CSO, as it is in our view that neither long or short sea discharges are viable long term solutions if the ambition of the DWMP is to be met.

I would therefore welcome an initial discussion between my officials at the Vale of Glamorgan and DCWW to address the concerns detailed above and to ensure a collaborative approach is taken to identify future improvements and necessary investments so as to further reduce the impacts from wastewater on our land and water environments.

Yours sincerely

Councillor Lis Burnett
Executive Leader and Cabinet Member for Performance and Resource
Arweinydd Gweithredol ac Aelod Cabinet dros Berfformiad ac Adnoddau