

1. Regarding item number 3 (discharge from Torrington), re settling of raw sewage in the storm tank:

a) what are the known health risks associated with dilute storm sewage being discharged?

Whilst SWW are not public health experts the Environment Agency (EA) permits are established to protect compliance of the receiving waters with the environmental standards that are relevant for that water. Where the standards include bacteriological standards (e.g. for bathing waters) the EA must take a proportionate approach in the control of all sources to help achieve compliance (subject to technical feasibility and/or disproportionate cost). It is important to appreciate that the EAs own investigation work into the bacteriological sources in the Torridge catchment indicate that over 90% is as a result of diffuse agricultural pollution and not sewage related sources.

b) if 'in principle only dilute storm sewage will be discharged', what evidence do you have about what actually happens in practice?

The operation of storm overflows is governed by flow control at the inlet of sewage treatment works (STW). The amount of flow treated by the STW is governed by EA flow to treatment policy and is dependent on the population served by the STW. The overflow to the storm tank can only occur when the levels in the sewer at the inlet are increased in wet weather above the level of the weir. As many historic networks are combined i.e. they include both the foul flow (that might normally be received in dry weather) and surface water (received during rainfall events), the overflow to the storm tank will be dilute sewage. The only time this might not be the case is if the STW inlet becomes blocked as a consequence of the STW receiving materials that are inappropriately disposed of to sewer (e.g. wet wipes / facial wipes etc.). Having overflowed to the storm tank, the tank itself will provide both screening and further settlement, resulting in a more dilute effluent being discharged.

2. By what date will our rivers and estuary be free of sewage?

Whilst this might seem to be a desirable objective in reality it is not a realistic target given the how sewerage systems and sewage treatment have evolved and the current legal and legislative framework that governs such processes. The centralisation and urbanisation of populations has resulted in the need to collect and treat waste, including sewage. Whilst initially this may have simply been piping sewage away from population centre; to discharge untreated into rivers and the sea, much has changed since the 1930's through the application of both health and environment standards, resulting in significantly improved levels of containment and treatment.

The key principle of protecting environmental compliance is through the setting of standards for discharges to minimise their impact on their receiving waters. EU and domestic legislation sets out the environmental standards expected for our rivers and estuaries and the Environment Agency (EA), through the setting of permits, establish the quality and containment conditions for discharges to help ensure environmental compliance is achieved. It is important within this process that the EA recognises all factors that might influence environmental quality (diffuse agriculture, diffuse urban, private sewerage as well as public sewerage) and takes a proportionate approach on the management/controls of these sources. All of SWWs discharges are covered by EA discharge permits and their performance and compliance is monitored and reported to the EA.

Improvements to discharges are governed by three principle factors; environmental quality standards not being met, new or tighter environmental standards and/or population growth/system capacity. This process is strongly regulated by the EA and Ofwat (the financial regulator), supported by the WaterFuture panel (an independent group of consumer

representatives, customer and community stakeholders), to help ensure any investment programme is economically, socially and environmentally sustainable.

3. What, in lay terms, are the main factors that constrain the achievement of sewage-free watercourses?

The levels of treatment and containment of sewage are principally set through the application of EU and domestic environmental legislation. Whilst it may be technically feasible to have sewage-free watercourses it would be cost prohibitive and unsustainable to deliver given the levels of infrastructure investment and disturbance necessary to fully separate surface water and foul flows, then contain all flows for treatment and to treat to a level that would allow alternative reuse of effluent that did not entail discharge to the environment. The existing regulatory framework provides a strict process for the continued sustainable improvement of environmental quality through the controlled and permitted discharge of effluent to meet relevant environmental standards.

4. What can TDC do to facilitate the achievement of sewage-free watercourses?

Whilst sewage-free watercourses may not be an achievable objective there is much that Torrington District Council can do to help minimise risks to the sewerage network to ensure that sewage can be collected and treated effectively. One of the key aspects of sewerage management is the extent to which surface water enters the network during storm events, ultimately taking up sewer capacity. In many areas this is an historic issue as the system was developed as a combined network. However all new developments should have fully separated surface water and foul systems, enforceable under existing planning controls. Furthermore helping to identify where surface water may have been inappropriately connected to the sewers can help in the remediation/removal of these flows thereby improving capacity.

Ensuring the continued free flow of the sewerage system also minimises the risks of blockages which can cause networks and treatment processes to discharge prematurely. Blockages are caused by two key issues; the disposal of inappropriate materials down the sewer and the discharge of fats, oils and grease (FOG), often in combination with each other. Whilst SWW actively campaigns (Love Your Loo ([http://www.southwestwater.co.uk/index.cfm?articleid=12365&searchkey=love\\_your\\_loo](http://www.southwestwater.co.uk/index.cfm?articleid=12365&searchkey=love_your_loo)), Think Sink (<http://www.southwestwater.co.uk/index.cfm?articleid=13370>), Dirty Dozen) to promote appropriate use of the sewerage network it is always helpful if these campaigns are also supported by others such local authorities and the EA. This can be achieved through linking materials and websites to appropriate resources and helping customers find these resources, to more direct information to food outlets/processors about FOG control during environmental health inspections.

5. The last couple of days there have been utterly foul smells permeating Torrington town. It's happened before and I initially thought it was silage but I am informed that it is the sewage works. Is this the case, and if so what is the issue/proposed resolution?

We have been unable to identify any particular reason why there would have been odours from the works at this time so it is difficult to determine if the works would have been the cause.