

DRAFT DRAINAGE AND WASTEWATER MANAGEMENT PLAN

- IN-HOUSE CONSULTATION RESPONSES E063a

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EXECUTIVE SUMMARY

Our first draft Drainage and Wastewater Management Pland (dDWMP) surveys went live on 8 July 2022 and closed on 30 September 2022. Our consultation was formed of three tailored surveys; customers, stakeholders and employees, with the shared aim of gaining feedback on our dDWMP.

The consultation focused on our four options for ending the use of Storm Overflows, a major statutory component of the dDWMP, and reducing the risk of sewer flooding. The options are summarised in the following table:

	Storm Overflow Reduction Plan met in the cheapest possible way – concrete tanks	Storm Overflow Reduction Plan met using natural solutions	Working with others to reduce the risk of flooding from all sources	Reduced risk of internal flooding for at risk properties	Delivered by	Total increase to average bills by 2030	Total increase to average bills by 2045
Option 1	V			0%	2045	£9	£49
Option 2	V		V	27%	2045	£12	£64
Option 3		V	V	75%	2045	£18	£123
Option 4		V	V	90%	2040	£34	£138

The customer consultation, which could be found on the <u>DWMP part of our website (now closed</u>), introduced customers to our four proposed options and asked which they preferred, as well as their views on the affordability and value for money of each option.

Stakeholders were invited to attend a webinar which introduced the plan and then asked to provide detailed feedback, either via a survey or in a written response.

The employee consultation, which could be found via an article on <u>The Source</u>, asked employees to choose their preferred option and to share their views on the affordability of each option.

18 Stakeholders began the survey, with 5 completing every stage. 60 Northumbrian Water customers began the survey, with 48 completing every stage. 24 NWG employees began the survey, with 18 completing every stage.

The findings suggest that the overall preferred option was option 4 - this was voted highest by all three groups. However, when asked specifically about affordability option 1 was considered the most affordable by customers and employees, given the current cost of living crisis.

Throughout this document we report on customers', employees', and stakeholders' responses to the dDWMP consultation in further detail.

INTRODUCTION

In July 2022, every water and wastewater (WaSC) company in England and Wales published their dDWMP for six weeks of consultation. We <u>published three main documents</u>, which together formed our dDWMP. These were a technical report, a non-technical report, and a <u>customer-friendly summary</u> of the plan. Our consultation opened on 8 July 2022 and closed on 30 September 2022.

Our dDWMP focuses on three main areas of improvements: flooding, the environmental and wastewater treatment. Our plan was developed in collaboration with customers and stakeholders with an interest in planning, development, risk management and the environment.

The dDWMP sets out the level of investment needed to make sure the drainage and wastewater system can manage in the future, balancing this against making sure that we work at a pace which is affordable to our customers, fair to the communities we serve, whilst seeking the highest environmental performance. Our drainage and wastewater services are important to our environmental and personal health. By planning, we can ensure we continue to provide these services effectively.

Our consultation was designed in-line with the government's <u>Guiding principles for drainage and wastewater</u> <u>management plans</u>, which states:

We expect companies to carry out meaningful and effective engagement with their customers in developing their draft plans, and through this be able to demonstrate that their final plans are acceptable to customers overall.

This consultation allows us to gain the insight and feedback of stakeholders, customers, and employees to establish the level of work that is fair and affordable while achieving the highest environmental performance.

This report sets out the findings of our consultation.

OUR APPROACH TO CONSULTATION

We took a two-phase approach to consultation.

- 1- The first phase was managed in-house. We hosted three online surveys, one for customers, one for employees and one for stakeholders. Participants were asked about their thoughts on option choices as well as the level of affordability they believe each option gave. Stakeholders were asked further information including the value for money of each option and how well our non-technical dDWMP described our approach
- 2- Phase two was delivered by our expert research partner, Explain. Explain hosted online and face-to-face deliberative workshops with household customers. They also engaged customers with experience of a wastewater failure and non-household participants via telephone interviews.

NUMBER OF RESPONSES

We invited stakeholders, employees and customers to take part in our consultation. Employees could take part in the consultation via an<u>article</u> on the source. Customers were invited to take part via a link published on our website as part of the dDWMP customer summary.

Stakeholders were invited via events to launch the draft plan. We kept stakeholders informed and engaged through our quarterly Strategic Planning Groups and through 18 separate stakeholder engagement workshops in August 2021. Once the dDWMP was published, but before the start of the official consultation period, we held four stakeholder workshops (two in person and two online) to go through the contents of the dDWMP and give people the opportunity to ask any

questions before they provided official feedback. We also recorded one of the online sessions and posted it on the dDWMP website so stakeholders who could not make the sessions could watch it back.

Responses to our dDWMP consultation were collected through three separate online surveys (these can be found in appendix 4), these were for Northumbrian Water stakeholders, customers, and employees. We had the following responses from each group:

- 18 Stakeholders began the survey, with 6 completing every stage
- 60 Northumbrian Water customers began the survey, with 40 completing every stage
- 24 NWG employees began the survey, with 14 completing every stage

Stakeholders representing the organisations listed below responded to our consultation. We also received responses from individuals who preferred not to state their organisation.

- Environment Agency (EA)
- Northumberland Inshore Fisheries Conservation Authority (IFCA)
- Durham County Council
- North Yorkshire County Council
- Gateshead Council

A further three stakeholder responses were received via email. they are included in full in Appendices 1-3. Those responses came from:

- CCW
- South Tyneside Council
- Northumberland County Council

PREFERRED OPTIONS

Respondents were given a choice of the four options below.

- **Option one** Our plan will work to achieve the targets the Government has proposed in its Storm Overflow Discharge Reduction Plan in the cheapest way possible (predominantly by building concrete tanks underground to temporarily store rainwater). No other benefits are achieved so this option includes little flood risk reduction benefits to local properties. We estimate this option will increase the average bill by 13% (around £49 a year) by 2045. This doesn't include the rate of inflation.
- **Option two** This option includes everything in Option one and in addition, we would work collaboratively with the Northumbria Integrated Drainage Partnership to reduce flooding risk from all our operations together. This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for 2,464 properties from 2025-30 and for an estimated 2,200 2,500 properties every five years from then up until 2045.We estimate this option will increase the average bill by 17% (around £64 a year) by 2045. This doesn't include the rate of inflation.
- **Option three** Our plan will look at the best value way to achieve the targets the Government has proposed in its Storm Overflow Discharge Reduction Plan by looking at the cost against each drainage community. These are typically an area around a storm overflow, sewage pumping station or wastewater treatment works.

Communities are more likely to enjoy the societal benefits of using, natural solutions to solve problems, rather than built infrastructure (such as creating natural habitats such as swales and ponds to store water). We would also work collaboratively, as described in option two. This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for:

- 8,084 properties in 2025-30
- 4,560 properties in 2030-35
- 9,884 properties in 2035-40
- 5,475 properties in 2040-45

We estimate this option will increase the average bill by 34% (around £123 a year) by 2045. This doesn't include the rate of inflation.

- **Option four** This option includes faster delivery of everything in options one and two and everything in Option three. In addition, we would work towards our ambitious goal of having zero internal property flooding by 2040. This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for:
 - 11,527 properties in 2025-30
 - 10,786 properties in 2030-35
 - 11,285 properties in 2035-40

We estimate this option will increase the average bill by 38% (around £138 a year) by 2045. This doesn't include the rate of inflation.

The infographic below represents the options preferred by stakeholders, customers, and employees' and an overall scoring¹. Please note, these figures are based on **small sample sizes**.



¹ Please note that some of the figures presented in the sections may not add up to 100% i.e., 99%/101%. This is due to the rounding.

Across all groups Option 1 was the least preferred option (joint with Option 2 for employees). Option 4 received the highest share of preference for stakeholder and customers, but not by huge margins. Option 3 was the preferred choice of the employees who took part.

In comments left to explain their choice, customers and stakeholders expressed concerns around affordability and a view that customers should not bear the full cost, with suggestions that some of the burden should be placed on stakeholders.

Customers' views

Option 1	Option 2	Option 3	Option 4
"Cheapest version but will it be enough[?]"	"Options 3 and 4 are too expensive in my view." "Option 2 is the best as it means Northumbrian Water collaboratively working with other authorities to meet the goal." "Due to current increases in energy and inflation I don't believe such a large increase would be beneficial to the company profile as it would receive more negative press than the positive the project may produce." "This seems a balanced approach for cost versus reward and will see around 1/3rd of customers relieved from flooding."	"I believe this option can be implemented first and then reviewed later" "Highly support options with multiple benefits and working with the environment and nature based solutions. Bill increase seems inevitable let's maximise value." "I think general public would pick the cheapest option. I'm lucky I have disposable income so could afford the increase." "I like the idea of using, creating natural areas to help with this."	"Having zero internal property flooding is the best option as the cost of repairs would exceed the increase in our bills" "Why only do part of a job when doing the whole lot has far greater benefits" "This seems to be the best option because it incorporates everything in the other options but does it faster, hopefully."

Thirteen customers left comments to explain why they had chosen their preferred option:

Six customers selected 'none', meaning that none of the options were acceptable to them. Four customers' reasons centred around opposition to bill increases, one customer felt that any increase to bills above inflation was unacceptable. Three customers felt that stakeholders should bear some of the cost or expressed concern that shareholders would take some of the funding as profit.

"I do not support an increase in bills above inflation."

"Because you have diverted the money you should have been investing, instead paying grossly inappropriate dividends."

"I would support option 1 in shareholders bore some of the cost.

"You are expecting us to pay for further improvements but all that will happen is the shareholders will get bigger payments. Time they put money back into the upgrades and repairs."

Two customers felt that the information we provided was not sufficient or clear enough for them to make a decision.

"The options other than option 1 which is easy to understand make no sense to me at all. It's just not clear at all."

"Not enough information is given for the actual societal benefits discussed to make a choice."

Stakeholder views

Durham County Council did not wish to support an individual option, but did note that option 1 would be unacceptable and that **Option 2 is viewed as meeting their minimum requirements** for acceptability with a preference towards seeking funding to deliver in elements of option 3 and 4 at a lower cost for customers.

"[Durham County Council] DCC does not wish to support an individual option however we do not support option 1 and our reasoning is set out in the comments box below...

DCC would accept Option 2 as a minimum due to the importance of the NIPD projects which reduce flood risk and access government funding. However, we would welcome a more holistic cost benefit approach to the option choice. Whilst it is appreciated that socially the cost of living crisis is likely to impact the choice of option for individual customers, generally the overall benefits to society, businesses and the environment could be greatly improved with option 3 or 4, particular given the relatively small increase between these two options. Working in Partnership with other relevant stakeholders to share resources and access greater funding opportunities can ensure multiple benefits to be realised, such as flood alleviation, environmental improvements /BNG, community and business resilience and/or growth, health and wellbeing." **Brian Weatherall (Durham County Council)**

Gateshead Council expressed a preference for **Option 3**, but similarly to DCC felt that customers should not bear the full cost and that some funding should be sought from stakeholders.

"Gateshead Council recognises that a balance needs to be struck between providing customers with an affordable, resilient wastewater service, and delivering on environmental performance; and therefore, prefers Option 3 given the additional flood management and wider environmental benefits. Gateshead Council supports the collaborative working of Northumbria Integrated Drainage Partnership and catchment partnerships: recognising the benefits of flood alleviation and environmental schemes for our residents, businesses and wildlife. However, customer bills should not bear the burden of generating revenue required to invest in NWL's assets, to deliver necessary environmental improvements. Northumbrian Water has a responsibility to protect the environment, and funding for additional investment should come from NWL's shareholders." Gayle Wilson (Gateshead Council)

A final stakeholder, who wished to give their views anonymously selected Option 4 and commented that.

"Internal sewer flooding for a 1 in 20 year event should be eliminated. Options 1 and 2 may compromise medium and long term surface water flood alleviation schemes, has this been considered and assessed?"

Employee views

Three employees left comments to explain why they had chosen their preferred option. Two of these employees had chosen option 1, on the basis of it being the cheapest, despite preferring option 4.

"Option 4 sounds to have very good outcomes but does not give enough details of it would be achieved and the extra cost would be a lot of money for the average household to find."

"Option four would be the best for everyone but is quite expensive."

The other participant, who'd chosen Option 4, stated:

"It's time to move from utilising and 'bodging' Victorian relic infrastructure into modern, environmental solutions."

AFFORDABILITY – CUSTOMERS AND EMPLOYEES

Participants in the customer and employee surveys were reminded how much each option would increase the average bill by and asked to rate how affordable they would find each option, if it were added to their bill from 2025 on a scale of affordability ranked from 1-10, with 1 being affordable and 10 being not affordable.

As a reminder, the options and associated costs presented were:

• Option one

We estimate this option will **increase the average bill by 13% (around £49 a year**) by 2045. This doesn't include the rate of inflation.

Option two

We estimate this option will **increase the average bill by 17% (around £64 a year)** by 2045. This doesn't include the rate of inflation.

• Option three

We estimate this option will **increase the average bill by 34% (around £123 a year)** by 2045. This doesn't include the rate of inflation.

• Option four

We estimate this option will **increase the average bill by 38% (around £138 a year)** by 2045. This doesn't include the rate of inflation.

The total number of participants responding to each question is fairly low (presented in brackets next to each option) as such we have taken the decision to 'band' the data into scores of 1-3, suggesting the option is considered more affordable, 4-6 for mid-range responses and of 7 to 10, suggesting the option is considered less affordable. These results should not be considered as representative of either customers or employees, instead they give an indication of views.



The infographic shows that scores indicating affordability descend from option 1 to option 4 for both customers and employees, with option 1 ranking as the most affordable option and option 4 the least for both parties. It is also notable that employees consistently rated each option as less affordable compared to customers.

Participants were invited to leave a comment to explain the scores they had given. Ten comments were left by customers and three by employees. The majority of comments (five) related to the cost-of-living crisis and concerns around future rises in inflation.

"Currently affordable but if bills continue to rise, it may not be." (NWG employee)

"If inflation increases rapidly by then I would imagine a lot of people would not be able to comfortably afford this along with other increases in the cost of living." (NW Customer)

"I understand infrastructure must improve however substantial increases in cost aren't sustainable in the current economic environment" (NW Customer)

Three participants suggested that profits should be used instead of increasing customers' bills.

"Cost to customers should kept to absolute minimum due to current strength of feeling around historical profit/investment levels." (NWG employee)

"You're already making profits; take the money out of them." (NW Customer)

"Time the profits already made are used for upgrades and repairs and not to increase payments to shareholders." (NW Customer)

Four comments expressed a willingness to pay for the options, due to the environmental benefits, with one participant setting a condition that the money was spent equitably across the region.

"It is the responsibility of everyone to protect the environment and this does inevitable means increasing bills" (NW Customer)

"Having a system in place by 2040 that would help both your customers and the environment is a great way of spending money" (NW Customer)

"Approx an extra £12 a month [option 4]? very affordable but ensuring customer's see the value for money in their communities will be essential (don't just promote work in the urban centres/population dense areas)." (NWG employee)

"Water is an undervalued resource, delaying making our water supplies resilience to population growth and climate change will only get more expensive the longer we delay. Increases in water bills should be born by those most able to afford the increases required. (NW Customer)

VALUE FOR MONEY - STAKEHOLDERS

Stakeholders were asked a similar question to the one posed to customers and employees on affordability, but instead of thinking about individual affordability stakeholders were asked to consider to what extent each option represents value for money for society and the environment over the long term. Stakeholders were asked to rate each option on a scale of 1-10 where 1 represents value for money and 10 does not represent value for money.

The number of stakeholders responding to this question was <u>very low</u> (presented in brackets next to each option) as such we have taken the decision to colour and band the data into scores of 1-3, suggesting the option is considered more affordable, 4-6 for mid-range responses and of 7 to 10, suggesting the option is considered less affordable. These results should not be considered as representative of stakeholders, instead they give an indication of views of those who responded to this question (Durham County Council, Northumberland Inshore Fisheries and Conservation Authority (IFCA), North Yorkshire County Council, a housing developer and two stakeholders who chose to respond anonymously).

	Option 1 (5 responses)	Option 2 (3 responses)	Option 3 (3 responses)	Option 4 (4 responses)
Durham County Council	1	-	-	-
Northumberland Inshore Fisheries and Conservation Authority	4	3	4	3
North Yorkshire County Council	6	6	-	6
A housing developer	2	2	5	6
Anonymous stakeholder	-	-	-	1
Anonymous stakeholder	1	-	1	-

STAKEHOLDERS FURTHER QUESTIONS

Stakeholders were asked to rate their level of agreement ranging from strongly agree to strongly disagree on seven statements. The response rate to these questions ranged from nine to 14. Responses were received from a housing developer, Northumberland IFCA, Durham County Council, North Yorkshire Council, Gateshead Council and individual stakeholders.



DRAFT DWMP CONSULTATION RESPONSES

Stakeholders were invited to comment on the scores they had given. Very few comments were received with Durham County Council accounting for the majority of comments and Gateshead Council leaving one:

Statement	Durham county Council's comments	Gateshead Council's comments
The plan takes into account the potential impacts of increased 'urban creep' (this is where land that naturally soaks up rain water is covered with impermeable surfaces such as flagstone, block paving or hardstanding	Agree "we welcome the inclusion of urban creep within the network models."	-
The plan provides a clear, transparent and consistent planning approach that is adaptable to respond to long- term drivers for drainage and wastewater services	Unsure "Whilst it is acknowledged that the government have prioritised CSO operation reduction as a key driver as a local authority and LLFA there are other priorities such as flood risk reduction and nutrient neutrality mitigation. From a planning perspective we welcome the ongoing dialogue with NWG to manage long term growth for housing and industry."	-
The plan facilitates partnership working between organisations	Strongly agree "We will continue to work with NWG and other relevant stakeholders to improve drainage and wastewater management."	-
The plan takes into account customers' rising expectations of the wastewater services Northumbrian Water provides	Agree "NWG has engaged stakeholders and customers quite thoroughly. However it is acknowledged in the DWMP that customers views on billing increases to improve drainage and wastewater management is unclear. Due to the timescales involved the plan does not take into account recent legislation such as Nutrient neutrality and/or the governments potential drivers to encourage growth."	Agree "Further integration with the Tyne Catchment Partnership and sub-groups including Team, offers opportunities to address flood and water management holistically and use nature-based solutions. Further consideration should also be given to integration with the preparation of Local Nature Recovery Strategies & Networks, Surface Water Management Plans and Green Infrastructure Delivery Plans, particularly linked with the alignment of blue-green corridors"

Statement	Durham county Council's comments	Gateshead Council's comments
The plan takes into account the potential impact of population growth'.	Agree "The plan uses a generalised population growth however we accept that that is likely the best and most consistent data available at this time."	-
The plan takes into account the potential impacts of climate change	Agree "Brava data has been utilised to determine priorities, we welcome that the data will be reanalysed due to recent changes in legislation and CC scenarios. It has not been possible to comment on specific data sets used.".	-
The plan provides a long-term view of drainage and wastewater management in the North East of England	Agree "This is the long term view of NWG not necessarily the views of all RMAs. It has a more of a focus on wastewater."	-

CONCLUSION

Across all groups Option 1 was the least preferred option (joint with Option 2 for employees). Option 4 received the highest share of preference for stakeholder and customers, but not by huge margins. Option 3 was the preferred choice of the employees who took part.

Option 1 was considered the most affordable option and option 4 the least for customers and employees. Employees consistently rated each option as less affordable compared to customers.

APPENDIX 1 - CCW'S COMMENTS ON NORTHUMBRIAN WATER'S DRAFT DWMP



CCW's comments on Northumbrian Water's draft DWMP

Date: September 2022

Customer Engagement.

We recognise the significant quantity and quality of the customer engagement the company has undertaken to help inform the development of your draft plan. This evident from the content the non-technical summary.

In the final plan, we would like to see a clear link between the feedback given by those who participated in the wide range of engagement activities the company undertook and how these views have influenced the plan. Evidence of who the company has tried to engage with, even if this was unsuccessful, would also demonstrate the company's commitment to engage with a wide range of stakeholders and customers.

Customer Summary

The customer summary is well written in plain English and therefore should be readily understood by customers. We are pleased to note that the company has carried out research with customers to test their views on these documents, the language used and the DWMP website.

We suggest the following may improve the document:

- Additional information is included to explain the issue of internal sewer flooding. At present Storm Overflows is the only subject covered in any detail and this doesn't seem balanced
- Summarise the present position regarding the number of properties at risk of sewage flooding, the number of storm overflow spills and wastewater treatment works at risk of not operating effectively. This will provide context and a baseline and help people understand the scale of the challenge.
- Prior to the four options given, it needs to be explained more clearly that bills are increased by inflation every year. It should also be mentioned that there are many other competing priorities that will affect customer bills, not just drainage and wastewater, and to outline what these are likely to be.

We would like to see the company develop this document further for the final plan, notably to include further detail on likely bill impacts. There is also further potential to use videos and clips to make the plan easier to access and understand.

General Comments

The company has a well established partnership with key stakeholders to develop cocreated solutions and that these have demonstrated wider benefits to communities. We note that through the wider engagement processes the company has identified more than "700 opportunities which were then categorised as 'Impact', 'Inform' or 'Record', depending on how they matched our identified risks". In the final plan we would like to see the further details about the potential opportunities to collaborate with others that these schemes present.

It is disappointing to note the company's statement that "The Storm Overflow Discharge Reduction Plan targets also lead us to produce options that require more traditional storage solutions, utilising concrete tanks with pumping stations, **rather than the green solutions**

our customers told us that they prefer". Nature based and catchment wide solutions can represent the best value long-term solutions, and we would encourage the company to look to the long term outcomes that can be achieved rather than adopting traditional engineering solutions that might offer an earlier output but come at a cost to the environment.

Storm Overflows and sewer flooding are some of the most visible service failures. However, the company needs to draw on the findings of customer research to establish customers' priorities as they develop their plan. Our <u>river water quality awareness research</u> can give some insight. Internal sewer flooding is unacceptable in any circumstances because of its impact on the individuals and families who suffer. Storm overflow discharges and wider sewer flooding directly affects the level of trust consumers have in the company. Our Water Matters research has seen satisfaction in sewerage services decline significantly during the last year with overall satisfaction with at 78% compared to 85% in the previous year. Themean score for trust in water companies is at its lowest since 2011. This has occurred during a time when storm overflows have featured heavily in the media.

We are pleased that the company has included an indication of high-level costs and bill impacts in the plan. Ultimately, there has to be a compromise between the company's ambition and the impact of investment costs on customers' bills. This should be informed by engagement with customers to establish and their willingness to pay, across all areas of expenditure not just drainage, and the pace with which they want to see improvement. It must also run in tandem with measures to protect financially vulnerable customers who may face affordability issues with increasing bills. The single water affordability scheme, which Defra is considering, is key to unlocking investment by protecting those least able to pay, which we know the company are supportive of.

Enquiries

Steve Grebby Policy Manager CCW <u>steve.grebby@ccwater.org.uk</u> 07778 198 228 28th September 2022

APPENDIX 2 SOUTH TYNESIDE COUNCIL'S RESPONSE TO OUR dDWMP CONSULTATION



Heidi Mottram Northumbrian Water Northumbria House Abbey Road, Pity Me Durham DH1 5FJ Date: Our ref: Your ref: 05th October 2022 DWMP/CONS/2022

Dear Ms Mottram,

Northumbrian Water Consultation on the draft Drainage and Wastewater Management Plan-South Tyneside Council's response

Thank you for consulting South Tyneside Council on the draft Drainage and Wastewater Management Plan (DWMP).

South Tyneside Council welcomes a DWMP that provides a long-term plan to create sustainable and resilient drainage and wastewater systems. It aligns with one of South Tyneside Council's community priorities to invest in our natural and built environment. Additionally, Sandhaven was recently recognised as best beach in the Sunday Times Award, and we are keen to ensure that combined sewer overflows (CSO's) are reduced overall in South Tyneside to avoid environmental impacts to our watercourses and beaches.

It is understood that four options are proposed to reduce CSO impacts to meet the targets set out in the Government's proposed Storm Overflow Discharge Reduction Plan. It is noted that no option considers complete disconnection of an outfall and also that on smaller tributaries the rate of dilution will be lower. It would be appreciated if Northumbrian Water could consider some disconnections as part of their detailed plans. For example, there are drainage communities where a number of CSO's exist on a short stretch of watercourse, such as East Boldon (DC 19) and near Brockerly Whins (DC5). Its if felt that it is not in the spirit of the Combined Sewer Overflow Reduction Plan to allow nine combined sewer overflows to spill ninety times when they are so close to each other and it is suggested that this should be considered as a single CSO location.

In relation to DC1 it has not been possible to identify the CSO's on the Howdon Drainage community maps but assume these are those identified in AMP 9 (2030-2035).

In relation to DC2 it has not been possible to identify the CSO's on the Howdon Drainage community maps but it is assumed that this spills to the River Don near the Tyne Tunnel entrance, which is currently proposed within AMP 10 (2035-2040).

There are no observations on DC3.

In relation to DC4 it is assumed the one identified CSO spills to Calf Close Burn which is a particularly small tributary of the river Don. In the draft Local Plan a large development is proposed south of Fellgate and it is not clear whether this proposal would require a larger scheme if the local plan is approved. It is also noted that this asset has a high spill frequency (363) so it is encouraging this is proposed early in AMP 8 (2025-2030).

In consideration of DC 5, as previously identified, 9 CSO's are present on a short stretch of watercourse and it is understood that options may include surface water separation. Although this approach is welcomed, it is important that this goes hand in hand with education and engagement with local residents and communities. It is also encouraged that properties are checked for misconnections which has the potential to undo the positive work a CSO reduction in terms of the outcomes for rivers.

There are no observations for DC6.

It is not clear where the 1 CSO in DC7 Simonside is located and would welcome clarification.

In relation to DC8 it is understood that 2 CSO's are identified as spilling into the Tyne Dock area which is proposed in AMP 9 (2030-2035). South Tyneside Council have continued flooding issues on the strategic road network in this location and this most recently flooding occurred in September 2022 (on 2 occasions) which also affected the metro line. As you are aware work has previously been undertaken in this location through the Northumbria Integrated Drainage Partnership and further discussion around how we can address this issue jointly would be welcome to ensure that the CSO reduction work does not worsen the flooding issue for Tyne Dock area.

There are no observations for DC 9.

In consideration of DC10 Marsden it is noted that on the drainage community summary map, it is identified as a high priority area, however the recommendation is for no investment which would appear contradictory. We also have concerns around the deterioration of Marsden Bay Bathing Water status. In relation to the point around no investment, Richard Woodhouse has advised this was an error and that there are plans to review this CSO. However, we would seek clarification of this in the final documentation to ensure this CSO is to be addressed.

There are no observations for DC11.

There are no observations for DC12.

In relation to DC20, from the Hendon Drainage community maps, it has been difficult to identify where the 1 CSO is location but it is assumed this is situated on Cutthroat Dene. Proposals for reduction have not been identified in this location within the documentation therefore clarification is sought.

In relation to DC21 it is believed that Whitburn Steel outfall is incorrectly identified on the Hendon Drainage Community maps and in the BRAVA data spreadsheet. It is shown as spilling to a river and it is understood that this spills to a bathing water. In light of this, it is asked that the spills reduction target is revised in this location and that the priority is moved from AMP 10 (2035-2040) to AMP 8 2025-2030.

It is reported that significant investment is required to reduce the impact of CSO's, and that the intention is that this investment will be reflected in bill increases for residents for all options. Whilst it is appreciated that significant investment is needed in this infrastructure these proposals come at a time when many residents are facing pressures with increased inflation and rising fuel costs. Can you confirm if any proportion of these costs are being met from the business profits from Northumbrian Water.

South Tyneside Council is committed to achieving its net zero ambitions and therefore we would welcome and support low carbon measures. However there is concern that whole life costs have not been considered in costing the options which may skew the costs presented currently to the customer. It is not clear what risk allowances have been included in cost estimates and whether

these are on a worst-case scenario basis for residents and businesses. In addition, can you confirm whether the efficiencies from partnership working have been included in these costs. It is expected that many schemes could bring in external funding such as Environment Agency Flood Defence Grant and Aid, local levy or other contributions, particularly for option 4. There is concern that by the time the detailed costs are known that residents will have already chosen their preferred option, a decision that potentially could affect bills for many years to come.

It is noted that many bill payers may choose costs purely based on least cost option without understanding the bigger picture as the documents are very technical.

In terms of South Tyneside Councils preferred option, as a stakeholder, options that address flood risk, water quality and sustainable solutions would be supported such as those outlined in options 3 and 4.

I trust this information is of use in finalising the DWMP however we are happy to discuss any comments in further detail. Please do not hesitate to contact Michelle Hogg, Operations Manager – Environmental Protection at michelle.hogg@southtyneside.gov.uk.

Yours sincerely,

Laura Turvey Service Lead-Environmental Sustainability

APPENDIX 3 – NORTHUMBERLAND COUNTY COUNCIL'S RESPONSE TO OUR dDWMP CONSULTATION



Northumberland County Council Comments on Northumbrian Water's draft Drainage and Wastewater Management Plan

Introduction

Having reviewed Northumbrian Water's draft Drainage and Wastewater Management Plan, Northumberland County Council's Planning Policy and Flood Risk Management teams have coordinated our comments below.

General comments

We would like to emphasise that issues relating to funding of the proposals in terms of costs and sources of funding are principally a matter for Northumbrian Water and Ofwat to consider. Our response should not be taken as an endorsement or preference for any particular increase in customer bills.

From a technical standpoint it is our opinion that the proposals should seek to provide best value and enable wider benefits to be achieved alongside the primary aim of reducing storm overflow discharges.

By seeking to provide best value solutions and wider benefits (including reducing flood risk, ecological improvements, social value and more) Northumbrian Water has the opportunity to leverage their funding by working with other organisations and funding streams to achieve more than they would be able to by working alone.

To this end, we would encourage Northumbrian Water to continue to identify opportunities to source additional funding and contributions from other sources. In particular, the beneficiaries and promotors of the wider benefits in reducing flood risk, improving ecology and providing social value. Opportunities should be taken to tie the DWMP programme in with other development schemes in the area and to maximise nature-based solutions.

Having been a partner in the Northumbria Integrated Drainage Partnership and seeing the value it has provided throughout Northumberland in terms of reducing flood risk, we are keen for this to continue.

NCC as Lead Local Flood Authority are aware of the serious consequences of flooding and the importance of Northumbrian Water continuing to fund works to reduce the risk of flooding from their network.

28th September 2022.

See over for comments on specific drainage communities...

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Comments on specific Drainage Communities

NORTHUMBERLA	NORTHUMBERLAND DWMP AREA			
Drainage Comm. Ref.	Area description	Comment		
Alnwick – most areas	Areas of the town close to the Northumberland Estate and covering a large number of housing and employment allocations,	While these areas are generally flagged as 'low priority' based upon them "containing a river water asset discharging to an area without environmental concerns", and although "storage at the storm overflow(s) and storage in the catchment" are recommended, we nevertheless wonder, given the high number of allocations and new development planned, whether the prioritisation could be raised. Has NWL consulted with the Northumberland Estate? They may have some suggestions for more environmental schemes within the Estate that could assist alleviating some of the problems. Has there been any coordination with the recent/ongoing NIDP study in Alnwick. Given we are aware of integrated issues in the area can this information be used to raise the prioritisation or inform the chosen option? There could be potential for works in this area to provide significant reductions in flood risk.		
Amble DC_03	Low Hauxley area	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the mapping shows it to lie alongside the sea and the sensitive coastal environments.		
Amble/Warkworth generally		There is an NIDP study in the current programme, with the study due to start in 2026/27. There could be significant opportunities to reduce flood risk. The study will look at Amble & Warkworth, both of which feed into the Amble STW.		
Belford – all areas	Belford and surroundings.	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the Belford Burn is in the highly sensitive area in terms of nutrient neutrality.		
Berwick-upon- Tweed – most areas	Berwick-upon- Tweed	Much of the town falls into the high priority category and requires substantial investment – presumably as soon as possible – to store both at the storm overflow(s) and in the catchment, in order to manage and improve spill and flooding performance. While it is fully understood that outflow will need to be intercepted in the most efficient manner close to the river estuary and sea, where the built-up areas abut these waterbodies, it is hoped that the element that comprises the more open catchment area further inland, could incorporate 'green' solutions - e.g. making use of riverbank areas to absorb excess river water. Areas DC_05, DC_06, DC_07, DC_08, DC_09 are all covered by an ongoing NIDP project and there are significant integrated flood risks throughout these areas which the options could seek to address. The most significant issues are along North Road, Berwick; and along Main Street, Spittal. The issues on Main Street Spittal are a partly result of issues in adjacent Highcliffe catchment.		
Blyth DC_01	Area along South Newsham Rd plus southern half of South Beach estate.	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone runs through to the sensitive coastline. Also, works are being done to alleviate the risk of flooding around Newsham station on the Northumberland Line. One wonders if there may be an opportunity for some of the necessary storage to be incorporated in the SuDS associated with the new station at minimal cost to the Water Authority.		

NORTHUMBE	RLAND DWMP AF	REA contra
Drainage Comm. Ref.	Area description	Comment
Blyth DC_03	Plessey Road /	There seems to be a contradiction between the stated amount of
	Ridley Park area	investment and the statement that no investment is required.
Blyth DC_06	Blyth Town Centre area	It is noted that there is a recommendation that, as a high priority "storage at the storm overflow(s) and storage in the catchment is created to manage and improve spill and flooding performance". Given the large amount of investment likely to go into the town centre, might there be a way of incorporating the necessary works within one
		or more of the redevelopment sites maybe even expedite the works further?
Blyth generally		There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk.
Boulmer DC_02	Water course between RAF Boulmer and the coast	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone runs through to the sensitive coastline.
Cambois DC_10	Coastal strip between the River Wansbeck and River Blyth	It is noted that there is a recommendation that, as a high priority "storage at the storm overflow(s) and storage in the catchment is created to manage and improve spill and flooding performance". Given the large amount of investment likely to go into the Cambois area, might there be a way of incorporating the necessary works within one or more of the redevelopment sites maybe even expedite the works further?
Cambois generally		There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk. The study will look at Bedlington & Cambois, both of which feed into the Cambois STW.
Cramlington DC_05	Beaconhill and surroundings	It is noted that this drainage community is classified as "low priority based upon it containing a river water asset discharging to an area without environmental concerns." However, given that the DWMP recommends that "storage at the storm overflow(s) and storage in the catchment is created [presumably later rather than sooner] to manage and improve spill and flooding performance" and given that large amounts of construction are planned for SW Cramlington just to the south, it is hoped that this might afford the opportunity for the works to be brought forward / incorporated into works required for that area, perhaps as part of future blue-green infrastructure. NCC's FCERM team are due to commence a study on flood risk throughout Cramlington and this could provide an opportunity to identify integrated risks and take coordinated actions to maximise the benefits.
E <u>II</u> ingham DC_03	Western end of Ellingham village	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Embleton DC_05	Newton-by-the- Sea	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone runs through to the sensitive coastline.
Etal DC_01	Etal	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.

NORTHUMBE	NORTHUMBERLAND DWMP AREA cont'd			
Drainage Comm. Ref.	Area description	Comment		
Felton	Area E of	There seems to be a contradiction between the stated amount of		
DC_03	Longframlington towards the A1	investment and the statement that no investment is required.		
Felton generally		There is an NIDP study in the current programme, with the study due to start in 2023/24. There could be significant opportunities to reduce flood risk.		
Haggerston Castle DC_01	South Low watercourse to the south of the holiday park.	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		
Hepscott DC_01	Hepscott	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		
Kirkwhelping- ton DC_03	Kirkwhelpington	There is no benefit recorded. Presumably there would be for the village?		
Lowick	Lowick sewage	There seems to be a contradiction between the stated amount of		
DC_02	works	investment and the statement that no investment is required.		
Lynemouth DC_06	Hadston to E Chevington plus A1068 corridor	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone runs through to the sensitive coastline.		
Morpeth DC_09	North Morpeth	It is noted that this area of the town falls into the high priority category and requires substantial investment – presumably as soon as possible – to store both at the storm overflow(s) and in the catchment, in order to manage and improve spill and flooding performance. While it is fully understood that outflow will need to be intercepted in the most efficient manner close to the river, where the built-up areas abut these waterbodies, it is hoped that some of the catchment area work, could incorporate 'green' solutions, possibly involving areas where development has yet to take place.		
Netherton	Netherton	There seems to be a contradiction between the stated amount of		
DC_01		investment and the statement that no investment is required.		
Netherton DC_02	Netherton eastern end	There seems to be a contradiction between the high priority status with the significant stated amount of investment associated with this, and the statement that no investment is required.		
Newbiggin DC_07	Newbiggin seafront area	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.		
Newbiggin DC_08	Newbiggin south	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.		
Newbiggin DC_09	Newbiggin – area around sewage works	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.		
Newbiggin generally	Ashington	NCC's FCERM team are due to commence a study on flood risk throughout Ashington and this could provide an opportunity to identify integrated risks and take coordinated actions to maximise the benefits.		
Norham generally		There is an NIDP study in the current programme, with the study due to start in 2027/28. There could be significant opportunities to reduce flood risk.		
Pegswood DC_01	Pegswood – area around sewage works	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		

NORTHUMBE	NORTHUMBERLAND DWMP AREA cont'd			
Drainage Comm. Ref.	Area description	Comment		
Pegswood DC_03	Pegswood – NW of village	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		
Powburn DC_01	Powburn	There is an NIDP study in the current programme, with the study due to start in 2025/26. There could be significant opportunities to reduce flood risk.		
Seahouses DC_01	Small area of coastline	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.		
Seahouses DC_06	Beadnell – harbour area	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.		
Shilbottle generally	Shilbottle	There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk.		
Whittingham DC_02	Whittingham	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		
Wooler DC_01	Wooler – area around sewage works	There seems to be a contradiction between the 'high priority' status, along with the stated amount of investment, and the statement that no investment is required.		

RURAL TYNE	RURAL TYNE DWMP AREA			
Drainage Comm. Ref.	Area description	Comment		
Allendale DC_03	Catton	It is noted that this this is flagged as 'high priority'. It is hoped that the location will allow a 'nature-based' solution – e.g. involving the flood plain areas of the East Allen Valley.		
Barrasford DC_01	Barrasford	While no investment is needed, it is noted that a 'blue-green corridor is marked and it is wondered whether there was any intention to invest in enhancing this.		
Broomhaugh DC_02	Riding Mill	The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.		
Broomhaugh DC_03	Stocksfield	The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.		
Broomhaugh DC_04	New Ridley to Broomhaugh	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required. The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.		
Fourstones DC_01	Newbrough	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		
Gunnerton DC_01	Gunnerton	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		
Haydon Bridge generally		The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.		

RURAL TYNE	RURAL TYNE DWMP AREA			
Drainage Comm. Ref.	Area description	Comment		
Hexham DC_03	Central, south and west Hexham	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.		
Hexham DC_05	Egger factory and the Anick area	While this is flagged as 'low priority' based upon it "containing a river water asset discharging to an area without environmental concerns", and although "storage at the storm overflow(s) and storage in the catchment" are recommended, we nevertheless note the high number of 'spills'. We wonder if the proposed gravel extraction in the haugh area SE of the Egger factory (Local Plan Policy MIN 8 – see map extract below) and its likely restoration to wetlands, may create the opportunity for more environmentally beneficial solutions at potentially no extra cost to NWL?		
Hexham generally		There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk.		
Wark on Tyne DC_01	Wark	Even though the required works are a low priority, it is hoped that enhancement of the marked blue-green corridor could form part of the eventual works.		

Comments on specific Drainage Communities cont'd...

TYNESIDE DWMP AREA		
Drainage Comm. Ref.	Area description	Comment
Howdon A-	Seaton Valley /	There is an NIDP study in the current programme, with the study due
Leg DC_05	Seghill	to start in 2022/23. There could be significant opportunities to reduce flood risk.
Howdon A-	Seaton Delaval	There seems to be a contradiction between the stated amount of
Leg DC_06	south / Hollywell	investment and the statement that no investment is required.
Howdon A- Leg DC_07	Seaton Delaval north / New	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns".
	Hartley / Seaton	However, the zone includes the sensitive coastline.
	Sluice	
Howdon A-	Seaton Burn	There seems to be a contradiction between the stated amount of
Leg DC_20	roundabout area	investment and the statement that no investment is required.

TYNESIDE DWMP AREA		
Drainage Comm. Ref.	Area description	Comment
Howdon C- Leg DC_11	Ponteland / Darras Hall	It is noted that the required works are a high priority; it is hoped that enhancement of the marked blue-green corridor could form part of these works. There is an NIDP study in the current programme, with the study due to start in 2028/29. There could be significant opportunities to reduce flood risk.
Howdon C- Leg DC_16	East of Heddon on the Wall	It is noted that the required works are a high priority; it is hoped that enhancement of the marked blue-green corridor could form part of these works.
Howdon EW- Leg DC_06	Wylam	Even though the required works are a low priority, it is hoped that enhancement of the marked blue-green corridor could form part of the eventual works.
Howdon EW- Leg DC_07	Wylam / Ovingham / Ovington	It is noted that the required works are a high priority; it is hoped that enhancement of the marked blue-green corridor could form part of these works.
Howdon EW- Leg DC_08	West Prudhoe / Mickley area	Even though the required works are a low priority, it is hoped that enhancement of the marked blue-green corridor could form part of the eventual works. There is an NIDP study in the current programme looking at the area around Prudhoe, with the study due to start in 2024/25. There could be significant opportunities to reduce flood risk.



Northumberland County Council Comments on Northumbrian Water's draft Drainage and Wastewater Management Plan

Introduction

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From a technical standpoint it is our opinion that the proposals should seek to provide best value and enable wider benefits to be achieved alongside the primary aim of reducing storm overflow discharges.

By seeking to provide best value solutions and wider benefits (including reducing flood risk, ecological improvements, social value and more) Northumbrian Water has the opportunity to leverage their funding by working with other organisations and funding streams to achieve more than they would be able to by working alone.

To this end, we would encourage Northumbrian Water to continue to identify opportunities to source additional funding and contributions from other sources. In particular, the beneficiaries and promotors of the wider benefits in reducing flood risk, improving ecology and providing social value. Opportunities should be taken to tie the DWMP programme in with other development schemes in the area and to maximise nature-based solutions.

Having been a partner in the Northumbria Integrated Drainage Partnership and seeing the value it has provided throughout Northumberland in terms of reducing flood risk, we are keen for this to continue.

NCC as Lead Local Flood Authority are aware of the serious consequences of flooding and the importance of Northumbrian Water continuing to fund works to reduce the risk of flooding from their network.

28th September 2022.

See over for comments on specific drainage communities...

Comments on specific Drainage Communities

NORTHUMBERLAND DWMP AREA		
Drainage Comm. Ref.	Area description	Comment
Alnwick – most areas	Areas of the town close to the Northumberland Estate and covering a large number of housing and employment allocations,	While these areas are generally flagged as 'low priority' based upon them "containing a river water asset discharging to an area without environmental concerns", and although "storage at the storm overflow(s) and storage in the catchment" are recommended, we nevertheless wonder, given the high number of allocations and new development planned, whether the prioritisation could be raised. Has NWL consulted with the Northumberland Estate? They may have some suggestions for more environmental schemes within the Estate that could assist alleviating some of the problems. Has there been any coordination with the recent/ongoing NIDP study in Alnwick. Given we are aware of integrated issues in the area can this information be used to raise the prioritisation or inform the chosen option? There could be potential for works in this area to provide significant reductions in flood risk.
Amble DC_03	Low Hauxley area	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the mapping shows it to lie alongside the sea and the sensitive coastal environments.
Amble/Warkworth generally		There is an NIDP study in the current programme, with the study due to start in 2026/27. There could be significant opportunities to reduce flood risk. The study will look at Amble & Warkworth, both of which feed into the Amble STW.
Belford – all areas	Belford and surroundings.	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the Belford Burn is in the highly sensitive area in terms of nutrient neutrality.
Berwick-upon- Tweed – most areas	Berwick-upon- Tweed	Much of the town falls into the high priority category and requires substantial investment – presumably as soon as possible – to store both at the storm overflow(s) and in the catchment, in order to manage and improve spill and flooding performance. While it is fully understood that outflow will need to be intercepted in the most efficient manner close to the river estuary and sea, where the built-up areas abut these waterbodies, it is hoped that the element that comprises the more open catchment area further inland, could incorporate 'green' solutions - e.g. making use of riverbank areas to absorb excess river water. Areas DC_05, DC_06, DC_07, DC_08, DC_09 are all covered by an ongoing NIDP project and there are significant integrated flood risks throughout these areas which the options could seek to address. The most significant issues are along North Road, Berwick; and along Main Street, Spittal. The issues on Main Street Spittal are a partly result of issues in adjacent Highcliffe catchment.
Blyth DC_01	Area along South Newsham Rd plus southern half of South Beach estate.	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone runs through to the sensitive coastline. Also, works are being done to alleviate the risk of flooding around Newsham station on the Northumberland Line. One wonders if there may be an opportunity for some of the necessary storage to be incorporated in the SuDS associated with the new station at minimal cost to the Water Authority.

Comments on specific Drainage Communities cont'd...

NORTHUMBERLAND DWMP AREA cont'd		
Drainage Comm. Ref.	Area description	Comment
Blyth DC_03	Plessey Road / Ridley Park area	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Blyth DC_06	Blyth Town Centre area	It is noted that there is a recommendation that, as a high priority "storage at the storm overflow(s) and storage in the catchment is created to manage and improve spill and flooding performance". Given the large amount of investment likely to go into the town centre, might there be a way of incorporating the necessary works within one or more of the redevelopment sites maybe even expedite the works further?
Blyth generally		There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk.
Boulmer DC_02	Water course between RAF Boulmer and the coast	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone runs through to the sensitive coastline.
Cambois DC_10	Coastal strip between the River Wansbeck and River Blyth	It is noted that there is a recommendation that, as a high priority "storage at the storm overflow(s) and storage in the catchment is created to manage and improve spill and flooding performance". Given the large amount of investment likely to go into the Cambois area, might there be a way of incorporating the necessary works within one or more of the redevelopment sites maybe even expedite the works further?
Cambois generally		There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk. The study will look at Bedlington & Cambois, both of which feed into the Cambois STW.
Cramlington DC_05	Beaconhill and surroundings	It is noted that this drainage community is classified as "low priority based upon it containing a river water asset discharging to an area without environmental concerns." However, given that the DWMP recommends that "storage at the storm overflow(s) and storage in the catchment is created [presumably later rather than sooner] to manage and improve spill and flooding performance" and given that large amounts of construction are planned for SW Cramlington just to the south, it is hoped that this might afford the opportunity for the works to be brought forward / incorporated into works required for that area, perhaps as part of future blue-green infrastructure. NCC's FCERM team are due to commence a study on flood risk throughout Cramlington and this could provide an opportunity to identify integrated risks and take coordinated actions to maximise the benefits.
E <u>ll</u> ingham DC_03	Western end of Ellingham village	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Embleton DC_05	Newton-by-the- Sea	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone runs through to the sensitive coastline.
Etal DC_01	Etal	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.

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NORTHUMBERLAND DWMP AREA cont'd		
Drainage Comm. Ref.	Area description	Comment
Felton	Area E of	There seems to be a contradiction between the stated amount of
DC_03	Longframlington towards the A1	investment and the statement that no investment is required.
Felton		There is an NIDP study in the current programme, with the study due
generally		to start in 2023/24. There could be significant opportunities to reduce flood risk.
Haggerston	South Low	There seems to be a contradiction between the stated amount of
Castle	watercourse to	investment and the statement that no investment is required.
DC_01	the south of the holiday park.	
Hepscott	Hepscott	There seems to be a contradiction between the stated amount of
DC_01		investment and the statement that no investment is required.
Kirkwhelping- ton DC_03	Kirkwhelpington	There is no benefit recorded. Presumably there would be for the village?
Lowick	Lowick sewage	There seems to be a contradiction between the stated amount of
DC_02	works	investment and the statement that no investment is required.
Lynemouth	Hadston to E	This area is stated to be "low priority based upon it containing a river
DC_06	Chevington plus	water asset discharging to an area without environmental concerns".
Marriath	A1068 corridor	However, the zone runs through to the sensitive coastline.
Morpeth DC_09	North Morpeth	It is noted that this area of the town falls into the high priority category and requires substantial investment – presumably as soon as possible – to store both at the storm overflow(s) and in the catchment, in order
		to manage and improve spill and flooding performance. While it is fully understood that outflow will need to be intercepted in the most efficient
		manner close to the river, where the built-up areas abut these waterbodies, it is hoped that some of the catchment area work, could
		incorporate 'green' solutions, possibly involving areas where development has yet to take place.
Netherton	Netherton	There seems to be a contradiction between the stated amount of
DC_01		investment and the statement that no investment is required.
Netherton	Netherton	There seems to be a contradiction between the high priority status
DC_02	eastern end	with the significant stated amount of investment associated with this, and the statement that no investment is required.
Newbiggin DC_07	Newbiggin seafront area	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns".
		However, the zone includes the sensitive coastline.
Newbiggin	Newbiggin	This area is stated to be "low priority based upon it containing a river
DC_08	south	water asset discharging to an area without environmental concerns".
		However, the zone includes the sensitive coastline.
Newbiggin	Newbiggin –	This area is stated to be "low priority based upon it containing a river
DC_09	area around sewage works	water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.
Newbiggin	Ashington	NCC's FCERM team are due to commence a study on flood risk
generally		throughout Ashington and this could provide an opportunity to identify integrated risks and take coordinated actions to maximise the benefits.
Norham		There is an NIDP study in the current programme, with the study due
generally		to start in 2027/28. There could be significant opportunities to reduce flood risk.
Pegswood	Pegswood –	There seems to be a contradiction between the stated amount of
DC_01	area around sewage works	investment and the statement that no investment is required.

NORTHUMBERLAND DWMP AREA cont'd		
Drainage Comm. Ref.	Area description	Comment
Pegswood DC_03	Pegswood – NW of village	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Powburn DC_01	Powburn	There is an NIDP study in the current programme, with the study due to start in 2025/26. There could be significant opportunities to reduce flood risk.
Seahouses DC_01	Small area of coastline	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.
Seahouses DC_06	Beadnell – harbour area	This area is stated to be "low priority based upon it containing a river water asset discharging to an area without environmental concerns". However, the zone includes the sensitive coastline.
Shilbottle generally	Shilbottle	There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk.
Whittingham DC_02	Whittingham	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Wooler DC_01	Wooler – area around sewage works	There seems to be a contradiction between the 'high priority' status, along with the stated amount of investment, and the statement that no investment is required.

RURAL TYNE DWMP AREA		
Drainage Comm. Ref.	Area description	Comment
Allendale DC_03	Catton	It is noted that this this is flagged as 'high priority'. It is hoped that the location will allow a 'nature-based' solution – e.g. involving the flood plain areas of the East Allen Valley.
Barrasford DC_01	Barrasford	While no investment is needed, it is noted that a 'blue-green corridor is marked and it is wondered whether there was any intention to invest in enhancing this.
Broomhaugh DC_02	Riding Mill	The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.
Broomhaugh DC_03	Stocksfield	The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.
Broomhaugh DC_04	New Ridley to Broomhaugh	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required. The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.
Fourstones DC_01	Newbrough	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Gunnerton DC_01	Gunnerton	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Haydon Bridge generally		The area is covered by an ongoing NIDP project and there are significant integrated flood risks throughout this area which the options could seek to address.

RURAL TYNE DWMP AREA		
Drainage Comm. Ref.	Area description	Comment
Hexham DC_03	Central, south and west Hexham	There seems to be a contradiction between the stated amount of investment and the statement that no investment is required.
Hexham DC_05	Egger factory and the Anick area	While this is flagged as 'low priority' based upon it "containing a river water asset discharging to an area without environmental concerns", and although "storage at the storm overflow(s) and storage in the catchment" are recommended, we nevertheless note the high number of 'spills'. We wonder if the proposed gravel extraction in the haugh area SE of the Egger factory (Local Plan Policy MIN 8 – see map extract below) and its likely restoration to wetlands, may create the opportunity for more environmentally beneficial solutions at potentially no extra cost to NWL?
Hexham generally		There is an NIDP study in the current programme, with the study due to start in 2022/23. There could be significant opportunities to reduce flood risk.
Wark on Tyne DC_01	Wark	Even though the required works are a low priority, it is hoped that enhancement of the marked blue-green corridor could form part of the eventual works.

Comments on specific Drainage Communities cont'd...

TYNESIDE DWMP AREA		
Drainage Comm. Ref.	Area description	Comment
Howdon A-	Seaton Valley /	There is an NIDP study in the current programme, with the study due
Leg DC_05	Seghill	to start in 2022/23. There could be significant opportunities to reduce flood risk.
Howdon A-	Seaton Delaval	There seems to be a contradiction between the stated amount of
Leg DC_06	south / Hollywell	investment and the statement that no investment is required.
Howdon A-	Seaton Delaval	This area is stated to be "low priority based upon it containing a river
Leg DC_07	north / New	water asset discharging to an area without environmental concerns".
	Hartley / Seaton	However, the zone includes the sensitive coastline.
	Sluice	
Howdon A-	Seaton Burn	There seems to be a contradiction between the stated amount of
Leg DC_20	roundabout area	investment and the statement that no investment is required.

TYNESIDE DV	TYNESIDE DWMP AREA		
Drainage Comm. Ref.	Area description	Comment	
Howdon C- Leg DC_11	Ponteland / Darras Hall	It is noted that the required works are a high priority; it is hoped that enhancement of the marked blue-green corridor could form part of these works. There is an NIDP study in the current programme, with the study due to start in 2028/29. There could be significant opportunities to reduce flood risk.	
Howdon C- Leg DC_16	East of Heddon on the Wall	It is noted that the required works are a high priority; it is hoped that enhancement of the marked blue-green corridor could form part of these works.	
Howdon EW- Leg DC_06	Wylam	Even though the required works are a low priority, it is hoped that enhancement of the marked blue-green corridor could form part of the eventual works.	
Howdon EW- Leg DC_07	Wylam / Ovingham / Ovington	It is noted that the required works are a high priority; it is hoped that enhancement of the marked blue-green corridor could form part of these works.	
Howdon EW- Leg DC_08	West Prudhoe / Mickley area	Even though the required works are a low priority, it is hoped that enhancement of the marked blue-green corridor could form part of the eventual works. There is an NIDP study in the current programme looking at the area around Prudhoe, with the study due to start in 2024/25. There could be significant opportunities to reduce flood risk.	
APPENDIX 4 – CONSULTATION SURVEYS

This consultation has been designed for Northumbrian Water's stakeholders to take part in. Please make sure that you have read our Drainage and Wastewater Management Plan non-technical summary before you begin. This can be found <u>here.</u>

If you are a household customer we also want to hear your views. Please read our Drainage and Wastewater Management Plan summary document, which you can find <u>here</u> and complete the survey at the end.

1. ABOUT YOU

Are you responding to this consultation (please select the option which best describes you):

- On behalf of a local authority
- On behalf of a regulator
- On behalf of a charity
- □ On behalf of a consumer organisation
- As an individual stakeholder
- □ Prefer not to say
- Other

2. ABOUT YOU

Northumbrian Water may publish responses from this consultation as part of our final Drainage and Wastewater Management Plan and associated publicity. If Northumbrian Water publish any of the comments you make in this consultation may we attached your organisation's name to them?

Yes

□ No

3. ABOUT YOU

Please provide the name of your organisation

Please provide your name

Please provide your email

4. ABOUT YOU

Do you live or work in the North East?

- Yes
- No
- Prefer not to say

5. OUR PLAN

There are a number of points that Northumbrian Water want to make sure are clearly and adequately addressed in our draft Drainage and Wastewater Management Plan.

Please read the seven statements over the following pages and rate your level of agreement with each of them. Your views are important to us and will be used to shape the final Drainage and Wastewater Management Plan, so please take the opportunity to provide comments.

6. LONG-TERM VIEW

Statement 1: The plan provides a **long-term view** of drainage and wastewater management in the North East of England

- Strongly agree
- □ Agree
- Unsure
- Disagree
- □ Strongly disagree

Please share any comments here

7. CLIMATE CHANGE

Statement 2: The plan takes into account the potential impacts of climate change

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree

Please share any comments here

8. POPULATION GROWTH

Statement 3: The plan takes into account the potential impacts of population growth

- □ Strongly agree
- □ Agree
- Unsure
- Disagree
- □ Strongly disagree

Please share any comments here

9. CUSTOMERS' EXPECTATIONS

Statement 4: The plan takes into account customers' rising expectations of the wastewater services Northumbrian Water provides

- □ Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree

Please share any comments here

10. PARTNERSHIP

Statement 5: The plan facilitates partnership working between organisations

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree

Please share any comments here

11. LONG-TERM DRIVERS

Statement 6: The plan provides a clear, transparent and consistent planning approach that is adaptable to respond to long-term drivers for drainage and wastewater services

- □ Strongly agree
- □ Agree
- Unsure
- Disagree
- □ Strongly agree

Please share any comments here

12. URBAN CREEP

Statement 7: The plan takes into account the potential impacts of increased 'urban creep' (this is where land that naturally soaks up rain water is covered with impermeable surfaces such as flagstone, block paving or hardstanding)

- Strongly agree
- □ Agree
- Unsure
- Disagree
- Strongly disagree

Please share any comments here

13. OPTIONS

The Government's proposed Storm Overflow Discharge Reduction Plan sets out targets to reduce discharges and eliminate harm to the environment, which all companies must address in their plans. We have designed four options to meet the Government's target. Please select your preferred option and explain why you've selected it in the comments box below

Least Cost Storm Overflow

Following early engagement with our economic regulator, Ofwat, we have produced an

option that meets their requirements to deliver on the Government's target at the least cost as a comparison for other best value plans. We estimate this option will increase the average bill by 13% (around £49 a year) by 2045. This doesn't include the rate of inflation.

Least Cost Storm Overflow + Northumbria Integrated Drainage Partnership (NIDP)

As per the least cost storm overflow option, but also including collaborative NIDP schemes linked to the EA's medium-term plan for flooding in the North East. We estimate this option will increase the average bill by 17% (around £64 a year) by 2045. This doesn't include the rate of inflation.

Best Value Storm Overflow

This takes into account the positive impacts on other planning objectives (such as $\hfill looding and pollution)$ and societal benefits from delivering the SODRP. This option

Incoding and pointion) and societal benefits from derivering the SODKP. This option tackles internal sewer flooding risk for 28.000 households by 2045. We estimate this option will increase the average bill by 34% (around £123 a year) by 2045. This doesn't include the rate of inflation.

Best Value Storm Overflow + NWG Flooding Ambitious Goal

In our 2020-25 business plan, we set an ambitious goal to eradicate sewer flooding in
□ the home by 2040. This option delivers the SODRP and sewer flooding ambitious goal together by 2040. We estimate this option will increase the average bill by 38% (around £138 a year) by 2045. This doesn't include the rate of inflation.

None of these options

If you select this option please let us know why in the comments box.

Please explain why you have chosen this option here

14. OPTIONS

The risk of internal sewer flooding during a 1 in 20 year storm would only be completely eliminated under Option 4. Was this made clear in the plan?

- Yes
- 🗆 No
- Don't know

15. COSTS

The cost of our options ranges from £1.2bn to £3.2bn by 2045.

To what extent do you think each option represents value for money for society and the environment over the long term?

Least Cost Storm Overflow

We estimate this option will increase the average bill by 13% (around £49 a year) by 2045. This doesn't include the rate of inflation.

\Box	Represents value for money
	3
	4
	5
	6
	7
	8
	9
	Does not represent value for money

Least Cost Storm Overflow + Northumbria Integrated Drainage Partnership (NIDP) We estimate this option will increase the average bill by 17% (around £64 a year) by 2045. This doesn't include the rate of inflation.

Represents value for money
2
3

- □ 4
- 5
- 6
- 07
- 08
- 09

Does not represent value for money

Best Value Storm Overflow

We estimate this option will increase the average bill by 34% (around £123 a year) by 2045. This doesn't include the rate of inflation.

- Represents value for money
- □ 2
- 03
- 4
- 5
- 6
- 07
- 8

Best Value Storm Overflow

We estimate this option will increase the average bill by 34% (around £123 a year) by 2045. This doesn't include the rate of inflation.

Represents value for money
2
3
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7
8
9
Does not represent value for money

Best Value Storm Overflow + NWG Flooding Ambitious Goal We estimate this option will increase the average bill by 38% (around £138 a year) by 2045. This doesn't include the rate of inflation.

Represents value for money
2
3
4
5
6
7
8
9
Does not represent value for money

16. AND FINALLY ...

Do you have any further comments you would like to make about our Drainage and Wastewater Management Plan?

17. THANK YOU

Thank you for taking part in our consultation. Following this consultation, the final Drainage and Wastewater Management Plan will be published on 31 March 2023.

Employee consultation

This consultation has been designed for Northumbrian Water Group colleagues to take part in. Please make sure that you have read our Drainage and Wastewater Management Plan Summary before you begin. You can find our summary <u>here</u>.

If you are a stakeholder, and would like to provide detailed feedback on our plan, you can access our non-technical Drainage and Wastewater Management Plan <u>here</u> and our stakeholder consultation <u>here</u>.

1. ABOUT YOU

Which region do you work in?

- Northumbrian Water
- Essex & Suffolk Water
- Prefer not to say

What is your gender?

- Male
- Female
- Prefer not to say
- Other (please specify) ______

What is your age?

- 24 or under
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- □ 75 or over
- Prefer not to say

2. REDUCING THE RISK OF FLOODING AND ENHANCING THE ENVIRONMENT

Would you support an increase to your water and wastewater bill to reduce the risk of flooding and enhance your local environment?

Yes

□ No

Don't know/unsure

If you have any comments to make about your response please share them here:

3. OPTIONS

We have four options for managing drainage and wastewater from 2025-2045. Which option do you prefer?

Option one

Our plan will work to achieve the targets the Government has proposed in its Storm Overflow Discharge Reduction Plan in the cheapest way possible (predominantly by building concrete tanks underground to temporarily store rainwater).

No other benefits are achieved so this option includes little flood risk reduction benefits to local properties.

We estimate this option will increase the average bill by 13% (around £49 a year) by 2045. This doesn't include the rate of inflation.

Option two

This option includes everything in Option one and in addition, we would work collaboratively with the Northumbria Integrated Drainage Partnership to reduce flooding risk from all our operations together.

□ This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for 2.464 properties from 2025-30 and for an estimated 2.200 - 2.500 properties every five years from then up until 2045.

We estimate this option will increase the average bill by 17% (around £64 a year) by 2045. This doesn't include the rate of inflation.

Option three

Our plan will look at the best value way to achieve the targets the Government has proposed in its Storm Overflow Discharge Reduction Plan by looking at the cost against each drainage community. These are typically an area around a storm overflow, sewage pumping station or wastewater treatment works.

Communities are more likely to enjoy the societal benefits of using, natural solutions to solve problems, rather than built infrastructure (such as creating natural habitats such as swales and ponds to store water).

We would also work collaboratively, as described in option two.

This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for:

- 8.084 properties in 2025-30
- · 4.560 properties in 2030-35
- 9.884 properties in 2035-40
- 5.475 properties in 2040-45

We estimate this option will increase the average bill by 34% (around £123 a year) by 2045. This doesn't include the rate of inflation.

Option four

This option includes faster delivery of everything in options one and two and everything in Option three. In addition, we would work towards our ambitious goal of having zero internal property flooding by 2040.

This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for:

- 11.527 properties in 2025-30
- 10.786 properties in 2030-35
- 11.285 properties in 2035-40

We estimate this option will increase the average bill by 38% (around £138 a year) by 2045. This doesn't include the rate of inflation.

□ None of these options

If you select this option please state why: ____

If you have any comments about the responses you have given on this page please share them here

4. AFFORDABILITY

We'd like to understand how affordable you think each option would be to you, if it was added to your bill from 2025.

Option one

We estimate this option will increase the average bill by 13% (around £49 a year) by 2045. This doesn't include the rate of inflation.

- This would be affordable to me
- 2
- □ 3
- 04
- 5
- **—** ,

- 8
- 09
- This would not be affordable to me

Option two

We estimate this option will increase the average bill by 17% (around £64 a year) by 2045. This doesn't include the rate of inflation.

This would be affordable to me

□ 2 □ 3 □ 4 □ 5

9

This would not be affordable to me

Option three

We estimate this option will increase the average bill by 34% (around £123 a year) by 2045. This doesn't include the rate of inflation.

- This would be affordable to me
- □ 2
- □ 3
- □ 4
- 5
- 6
- 07
- 8
- 9
- This would not be affordable to me

Option four

We estimate this option will increase the average bill by 38% (around £138 a year) by 2045. This doesn't include the rate of inflation.

- This would be affordable to me
- □ 2
- □ 3
- 4
- 5
- □ 6
- 7
- 8
- 9
- $\hfill\square$ This would not be affordable to me

If you have any comments about the responses you have given on this page please share them here

5. AND FINALLY ...

Do you have any further comments you would like to make about our Drainage and Wastewater Management Plan?

Thank you for taking part in our consultation.

Our final Drainage and Wastewater Management Plan will be published on 31 March 2023.

Customer consultation

This consultation has been designed for Northumbrian Water's customers to take part in. Please make sure that you have read our Drainage and Wastewater Management Plan Summary before you begin. You can find our summary <u>here</u>.

If you are a stakeholder, and would like to provide detailed feedback on our plan, you can access our non-technical Drainage and Wastewater Management Plan <u>here</u> and our stakeholder consultation <u>here</u>.

1. ABOUT YOU

Do you live in the North East of England?

- Yes
- No
- Prefer not to say

What is your gender?

- Male
- Female
- Prefer not to say
- Other (please specify) ______

What is your age?

- 24 or under
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- □ 75 or over
- Prefer not to say

2. REDUCING THE RISK OF FLOODING AND ENHANCING THE ENVIRONMENT

Would you support an increase to your water and wastewater bill to reduce the risk of flooding and enhance your local environment?

Yes

□ No

Don't know/unsure

If you have any comments to make about your response please share them here:

3. OPTIONS

We have four options for managing drainage and wastewater from 2025-2045. Which option do you prefer?

Option one

Our plan will work to achieve the targets the Government has proposed in its Storm Overflow Discharge Reduction Plan in the cheapest way possible (predominantly by building concrete tanks underground to temporarily store rainwater).

No other benefits are achieved so this option includes little flood risk reduction benefits to local properties.

We estimate this option will increase the average bill by 13% (around £49 a year) by 2045. This doesn't include the rate of inflation.

Option two

This option includes everything in Option one and in addition, we would work collaboratively with the Northumbria Integrated Drainage Partnership to reduce flooding risk from all our operations together.

This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for 2.464 properties from 2025-30 and for an estimated 2.200 - 2.500 properties every five years from then up until 2045.

We estimate this option will increase the average bill by 17% (around £64 a year) by 2045. This doesn't include the rate of inflation.

Option three

Our plan will look at the best value way to achieve the targets the Government has proposed in its Storm Overflow Discharge Reduction Plan by looking at the cost against each drainage community. These are typically an area around a storm overflow, sewage pumping station or wastewater treatment works.

Communities are more likely to enjoy the societal benefits of using, natural solutions to solve problems, rather than built infrastructure (such as creating natural habitats such as swales and ponds to store water).

We would also work collaboratively, as described in option two.

This option would see the risk of internal sewer flooding (during a 1 in 20-year storm) being reduced for:

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- 9.884 properties in 2035-40
- 5.475 properties in 2040-45

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We estimate this option will increase the average bill by 38% (around £138 a year) by 2045. This doesn't include the rate of inflation.

□ None of these options

If you select this option please state why: ____

If you have any comments about the responses you have given on this page please share them here

4. AFFORDABILITY

We'd like to understand how affordable you think each option would be to you, if it was added to your bill from 2025.

Option one

We estimate this option will increase the average bill by 13% (around £49 a year) by 2045. This doesn't include the rate of inflation.

- □ This would be affordable to me
- 2
- □ 3
- □ 4
- 5
- _

- 0 8 0 9
- □ This would not be affordable to me

Option two

We estimate this option will increase the average bill by 17% (around £64 a year) by 2045. This doesn't include the rate of inflation.

This would be affordable to me

 $\bigcirc 2$ $\bigcirc 3$

- \Box This would not be affordable to me

Option three

We estimate this option will increase the average bill by 34% (around £123 a year) by 2045. This doesn't include the rate of inflation.

This would be affordable to me

- □ 2
- □ 3
- 4
- 5
- □ 6
- 07
- 8
- 09
- This would not be affordable to me

Option four

We estimate this option will **increase the average bill by 38% (around £138 a year)** by 2045. This doesn't include the rate of inflation.

 $\hfill\square$ This would be affordable to me

- 2
- 3
- 4
- 5
- □ 7 □ 8
- - J 9] This would a
- This would not be affordable to me

If you have any comments about the responses you have given on this page please share them here

5. AND FINALLY ...

Do you have any further comments you would like to make about our Drainage and Wastewater Management Plan?

Thank you for taking part in our consultation.

Our final Drainage and Wastewater Management Plan will be published on 31 March 2023.