

A	SOS Query	YW Response	SOS: questions not answered	Internal Review Response EIR 1129
1	We noted that YW intends re-purposing the 3 redundant Dortmund tanks on site to become extra storm overflow tanks so as to reduce the amount of sewage dumping into the Swale. Can you give a date when this work is due to be completed as it is a question often raised in our correspondence? In addition, can you specify the current storm overflow storage capacity of the 2 purpose-made tanks, which we understand will be enhanced by a further 183,000 litres of storm overflow storage once the Dortmund tanks are refurbished?	This work is now all complete and fully operational, it was completed in June 2025, and the work was undertaken to reduce spills from storm events.	What is the current storm overflow storage capacity of the 2 purpose-made tanks or what is the total storm overflow storage capacity with the refurbished Dortmund Tanks?	The capacity of the new storm tanks = 225m3 the original storage is 506m3 total now = 731m3 & the consent is 702m3.

2	<p>We understand from the Environment Agency CAR dated 17/9/21 S/O745045 that at that time YW said they could utilise the Dortmund Tanks when the Primary Settlement Tank was blocked. For example, how often since 17/9/21 have the Dortmund Tanks been used in this way? What will happen if or when the PST gets blocked after the Dortmund Tanks have been repurposed as storm overflows?</p>	<p>If we had blockages, we would be required to jet the line as and when needed and tanker direct from primary tank as we would any other site if we had unforeseen issues, we would also raise jobs for the Ram Pumps to be looked at and serviced if deemed necessary.</p>	<p>How often since 17/9/21 have the Dortmund Tanks been used when the Primary Settlement Tank was blocked?</p> <p>SOS assumes that when there is a blockage all incoming flows are now diverted to the Storm Tanks/repurposed Dortmund Tanks. Are the repurposed Dortmund Tanks designed to take dry weather strength sewage?</p>	<p>Since the 17 September 2025 the Dortmund Tanks have not been used as Primary Settlement Tanks.</p> <p>Following our original response, if blockages were identified we would be required to jet the line as required, and when needed tanker direct from the primary tanks in line with our operational process, as we would at other sites if we had unforeseen issues. We would also raise jobs for the Ram Pumps to be looked at and serviced if deemed necessary.</p> <p>Based on the above, we would not divert the incoming flows to the Storm Tanks / Dortmund Tanks. As such they would not be taking dry weather strength sewerage.</p>
3	<p>According to the EA CAR dated 18/4/22 I/0747329 it was noted that 'on multiple occasions FFT was not being met when the storm tanks were filling and on many</p>	<p>The Penstock was fully opened and securely locked off approximately two months ago to ensure the site complies with PFF requirements. Ongoing</p>	<p>U_MON4 requires – <i>“Installation of MCERTS flow monitoring as close to the overflow as practicable to record FFT at WwTW where the existing DWF MCERTS flow monitoring, or other installed flow monitoring, cannot be readily used to confirm the permitted FFT setting is being complied with when the overflow to storm tanks operates.”</i></p> <p>See,</p>	<p>Following the Environment Agency (EA) Compliance Assessment Report (CAR) form from the 18 April 2022 we have undertaken work on the Penstock. The Penstock was fully opened and securely locked off approximately two months ago to ensure the site complies with PFF requirements. Ongoing monitoring is being conducted using the Umon 4 and current readings indicate everything is in order.</p>

	<p>occasions the tanks also discharged to river. This problem has persisted for over 15 months without a resolution.’ Such discharges are of course non-permitted and, according to the EA, may have adversely impacted ‘on the performance of the biological filters, the quality of the effluent discharged to river and [whether] this is affecting compliance with the Look-Up table BOD limits outlined in the permit.’ Could you specify what work YW has carried out to rectify the problem of the storm tanks filling when they were not permitted to do so, and on what dates</p>	<p>monitoring is being conducted using the Umon 4 and current readings indicate everything is in order.</p>	<p>https://www.gov.uk/government/publications/mcerts-requirements-for-installing-and-using-event-duration-monitors/mcerts-requirements-for-installing-and-using-event-duration-monitors</p>	<p>The Umon 3 indicates spill to storm tank, Umon 4 measures the amount and alterations to the penstock have insured we meet the permit requirements defined below: https://www.gov.uk/government/publications/mcerts-requirements-for-installing-and-using-event-duration-monitors/mcerts-requirements-for-installing-and-using-event-duration-monitors</p>
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	this work took place?			
4	Similarly, a question on future use – how does YW plan to avoid FFT not being met with the re-purposed Dortmund Tanks? Both the flow to treatment channel and the storm tank inlet channel are fitted with Parshall flumes for flow measurement. The measurement equipment for the storm tank feed has been disconnected and not replaced. Surely knowing the quantities of spill is essential for efficient operation?	The FFT and reduction of storm spills are different elements as noted above the FFT shortfall has been addressed and the storm tank feed is as it was the flows now will also utilise the extra capacity in the repurposed tanks.	Given that the storm overflow weir is on the side of the FFT channel it is difficult to see how they are not interrelated elements. Also, given that in 5 below you state that you do not know the distance between TWL @FFT and the overflow weir level it can perhaps be assumed that you have solved the FFT shortfall, but how can you claim to have reduced storm spills	Storm spills have been reduced due to 225m3 of extra storm storage and this in turn reduces the number of spills. With the data that is being collected, this will allow us in time to understand the reduction in spills. The storm overflow and FFT are interrelated due to the fact FFT (64.2l/s) must be met before storm overflow activates to storm tanks, once the storage is full (731 m3) then the spill will enter the environment and be recorded via the Umon 3.
5	Also, can you please let us know the physical distance between TWL in the flume when passing FFT and the top level of the storm weir as we had a	In consulting with the business, we have been able to confirm that we do not hold this information. As such for the purpose of EIR we	FFT passes forward through a Parshall flume. The depth of flow at FFT (and any other flows) can be calculated, knowing the geometry of the flume. If you don't know the level of the overflow weir, how do you know it isn't below the TWL at FFT?	In reviewing our original response we are upholding the exemption that we applied, in regard to not knowing the physical distance between the TWL in the flume when passing FFT and the top level of the storm weir. As such for the purpose of EIR we applied exemption 12(4)(a), a public authority may refuse to disclose information to the extent that it does not

	specific question raised on this from an engineer?	applied exemption 12(4)(a), a public authority may refuse to disclose information to the extent that it does not hold that information when an applicant's request is received.		<p>hold that information when an applicant's request is received.</p> <p>We can however confirm we understand the physical distance between the Top Water Level (TWL) in the flume when passing FFT (Flow to Full Treatment) and the top level of the storm weir is a key measurement in stormwater and wastewater treatment systems. At Richmond this arrangement is fully compliant, as the measurement and setup have been MCERTS certified. The certification process includes rigorous assessment and testing to ensure that all aspects of the system, including the critical distance between the TWL in the flume and the storm weir, meet the required standards.</p> <p>The fact that this configuration has passed MCERTS certification demonstrates that it adheres to all regulatory and technical requirements.</p> <p>This confirms that the design of the flume is what it should be and this was verified earlier this year as part of the site improvements to reduce storm spills via the MCERTS.</p>
6	In the EA's 17/9/21 report they found that 'During 2020 and 2021 there have been multiple exceedances of the	BOD is taken on the monthly OSM Look up visits and Lab tested to ensure it passes	<p>Could you tell us what work has been carried out, and when, to remedy these multiple exceedances?</p> <p>Can testing only on monthly visits give an accurate picture of BOD over time?</p>	In the CAR form issued on the 11 October 2021, there was an action for YW to provide a detailed Compliance Action Plan following a site visit on the 17 September 2021.

	Look-Up permit limits, mainly for BOD.’ Clearly this site was not operating to permit at the time. Could you tell us what work has been carried out, and when, to remedy these multiple exceedances?			<p>The information below detailed the planned action to return Richmond WwTw to full compliance with permit requirements, some of these were completed prior to the CAR form being received following earlier engagement with the EA.</p> <p>Please note, any actions recorded below as ongoing are still ongoing, as this forms part of our operational duty on every visit.</p> <table><tr><th>Stage</th><th>Description</th><th>Date projected</th><th>Date Achieved</th></tr><tr><td>1</td><td>Ensure Filter bed remains free from debris</td><td>Ongoing</td><td>Ongoing</td></tr><tr><td>2</td><td>Regular independent visits to site</td><td>Complete</td><td>August 2022</td></tr><tr><td>3</td><td>Daily site data check from member of Technical Support Team</td><td>Ongoing</td><td>August 2022</td></tr><tr><td>4</td><td>Install overflow from humus returns well to sludge well</td><td>Complete</td><td>August 2020</td></tr></table>	Stage	Description	Date projected	Date Achieved	1	Ensure Filter bed remains free from debris	Ongoing	Ongoing	2	Regular independent visits to site	Complete	August 2022	3	Daily site data check from member of Technical Support Team	Ongoing	August 2022	4	Install overflow from humus returns well to sludge well	Complete	August 2020
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				5	Review rotation alarm priority	Complete	May 2020
				6	Installation of splash plates on sparge holes	Complete	August 2020
				7	Service filter rotation sensor	Complete	August 2020
				8	Amend pump control levels in humus return well	Complete	May 2021
				9	Repair fault on control for recirculation pump flow	Complete	July 2021
				10	Weekly Local management team meeting to review site performance	Ongoing	Ongoing
				11	Amend pump control levels in humus return well	Complete	May 2021
				12	Install non return valve in humus de sludge line	Complete	July 2021

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					<p>As part of our compliance plan for the site we took additional samples of the final effluent. Samples went up from 12 samples a year to 24 samples a year from last site failure.</p> <p>The site was subject to daily operational visits (7 days a week) to monitor performance and to ensure that all operational tasks were carried out. The effluent was field tested for turbidity and Amm-N on each visit using a handheld monitor, with appropriate review and escalation if a site trigger breached. Turbidity data infers a relationship between BOD and solids with internal trigger levels set based on an historic relationship profile taken from official sampling data.</p>																

				<p>As of the 5 August 2022 site visit has dropped to 5 days per week. Weekend visits were from this point raised as required and attended should the site operator raise any concerns during the week and the site would benefit from additional visits.</p> <p>Any anomalies in performance are flagged by the Treatment Support Engineer for the area and a thorough investigation into cause is initiated by the Operational Field Manager and Technical Optimiser & Senior Operator.</p> <p>The Meteor sampler was removed on 15 July 2022. The Hach Lange Turbidity monitor is still in place and fully functional.</p> <p>Since 2021 the following improvements have been made on site</p> <ul style="list-style-type: none"> • An overflow was installed linking the humus sludge returns well and the adjacent returns well. Giving extra capacity for humus sludge returns • Non return valve was installed on the humus de sludge line from the humus settlement tank de sludge pump. This stopped humus sludge backing up into the humus settlement tank and effecting the quality of final effluent • Optimization of recirculation flows and rotation of the plastic media filter (SK value) allowing better treatment performance
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				Testing for Biochemical Oxygen Demand (BOD) monthly is the regulatory requirement and can provide an accurate picture of BOD.
7	<p>From the EA's CAR dated 11/08/22 R/0747366, it is clear that the above two issues of storm tanks filling when not permitted and BOD levels being exceeded, had still not been dealt with (please see page 2 of the report). The EA found it 'extremely concerning' that incoming flows were approaching FFT in dry weather, (raising the question of totally illegal dry dumping), and asked whether 'incoming loads exceed the design capacity of the works. Could you tell us what YW has done, and when, to ensure the capacity</p>	<p>This answered has been provided in response to point 1, both FFT shortfall and reduction of storm spills</p>	<p>We didn't really receive a response to point 1.</p> <p>The EA and SOS asked whether 'incoming loads exceed the design capacity of the works. Please answer.</p>	<p>The WWTW capacity and permit are sufficient utilising industry standard calculations. For example the dry weather flow (DWF) permit value represents a standard level of domestic consumption and infiltration, and the site operates within this permit every year. The FFT permit value is also set at an industry standard level which ensures that diurnal flow peaks are contained and do not pass to storm tanks.</p> <p>Notwithstanding the above, the catchment does deliver additional flow during the wetter months of the year, and the number of storm overflows at the site is above the storm overflow assessment framework (SOAF) trigger. As a result of this a full SOAF investigation will be undertaken which will understand the cause and impact of the overflows, and solution interventions to reduce the number of spills. Once this work is complete, the resolution timescales will be confirmed. Our storm overflow reduction plan (SODRP) has commenced in AMP8 but due to the scale of the programme, interventions continue until 2050.</p> <p>Current Drinking Water Management Plan (DWMP) view shows Richmond WWTW (and many of the CSOs below) planned for AMP9, but those plans may be subject to change based on AMP8 SOAF investigations.</p>

	of the works will be able to deal with the incoming loads?			
8	For example, why does a town the size of Richmond only have one PST? Is that really sufficient when we know that it is 'prone to blockages'? (EA CAR 17/09/21). Also, is one PST going to be able to cope with the additional 183,000 litres of storm overflow that will be stored on site once the conversion work on the Dortmund tanks is completed?	The storm will return once inlet levels permit; site will only pass forward FFT and as such will not affect the primary tank, the site is designed to work with 1no primary tank and has done for many years	Difficult to comment without knowing capacities – see SOS question 1	All capacity is being met with no overloading issues, the capacity of the PST is as per flow design and it is 440m3
9	From the same EA report we know that the percolating filter containing the plastic media and which takes 60% of the flow does not perform as well as the other 2 filters. Couldn't the redundant filter bed	As above when site was redesigned which removed 2 old stone filters and replace with the High-Rate Plastic, the plastic media filter is sampled separately when required and mitigation such as	This response does not answer the question. Couldn't the redundant filter bed in the middle of the site be refurbished so as to improve capacity?	The current flow configuration does not require additional biological treatment. Activating the redundant filter would divert sewage away from the existing system, reducing the influent necessary for effective treatment

	in the middle of the site be refurbished so as to improve capacity? This is particularly relevant as Richmond is a tourist destination with a much expanded population during holidays, quite apart from the fact that the new government intends to green light more house building in the area, so the population will grow.	flushing can take place to improve performance		
10	Similarly, there is concern regarding the input from surrounding feeds to the treatment works and local residents have questions on capacity provision for housing developments. Specifically, could you confirm whether the	<p>The site takes flows from Richmond only.</p> <p>YWS supports and encourages sustainable development, as this creates the lowest environmental impact and keep future YWS customer bills lower. For housing developers this means that we</p>	Your answer does not address capacity for foul water flows from new and future developments.	<p>The site takes flows from Richmond only.</p> <p>YWS supports and encourages sustainable development, as this creates the lowest environmental impact and keep future YWS customer bills lower. For housing developers this means that we want to ensure appropriate surface water disposal to prevent unnecessary hydraulic loading particularly with rainfall. If surface water from new developments is retained in the combined sewerage system, this can lead to additional use of storm overflows and will mean that Yorkshire Water (funded by customers)</p>

	<p>Richmond works receive feeds from Hudswell, Gilling West, Skeeby and Brompton, or whether these are processed directly by the Colburn works?</p>	<p>want to ensure appropriate surface water disposal to prevent unnecessary hydraulic loading particularly with rainfall. If surface water from new developments is retained in the combined sewerage system, this can lead to additional use of storm overflows and will mean that Yorkshire Water (funded by customers) will invest in larger infrastructure to prevent environmental harm of the local water environment.</p> <p>The National Planning Policy Framework (NPPF) sets out the principle of sustainable drainage, while the National Planning Practice Guidance (NPPG) and Part H3 of the Building Regulations 2010</p>		<p>will invest in larger infrastructure to prevent environmental harm of the local water environment.</p> <p>The National Planning Policy Framework (NPPF) sets out the principle of sustainable drainage, while the National Planning Practice Guidance (NPPG) and Part H3 of the Building Regulations 2010 establish a hierarchy for surface water disposal. This hierarchy prioritises discharge to ground (infiltration), followed by discharge to a surface water body, then to a surface water sewer, and finally to a combined sewer.</p> <p>YWS seeks to promote this hierarchy in collaboration with Local Planning Authorities and developers to improve water quality and reduce flood risk. As such, in practical terms when New Developments are proposed within catchments, our responses to planning applications will generally be as follows;</p> <ol style="list-style-type: none"> 1. Where a development will discharge more surface water to the combined sewerage system we may object to the application on the grounds of the non-sustainable impact on the environment and our customers. We will separately review the impact of any foul discharges. 2. Where a development will discharge less surface water to the combined sewerage system
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		<p>establish a hierarchy for surface water disposal. This hierarchy prioritises discharge to ground (infiltration), followed by discharge to a surface water body, then to a surface water sewer, and finally to a combined sewer.</p> <p>YWS seeks to promote this hierarchy in collaboration with Local Planning Authorities and developers to improve water quality and reduce flood risk. As such, in practical terms when New Developments are proposed within catchments, our responses to planning applications will generally be as follows;</p> <p>1. Where a development will discharge more surface water to the combined sewerage</p>		<p>than current volumes from that site we are unlikely to object to the application. We will separately review the impact of any foul discharges.</p> <p>3. Where a development will not discharge surface water to the combined sewerage system we will review the impact of the foul discharges but are unlikely to object to the application.</p> <p>4. Where a development will connect surface water into an existing surface water sewer, subject to EA agreement and flood risk assessments being accepted, we are unlikely to object to the application. We will separately review the impact of any foul discharges.</p> <p>Where we object to a development but it is ultimately approved, we will build the impact of the development into our plan.</p> <p>Based on the above, assessments and further analysis will be undertaken on a case by case basis when considering new and future development in the area.</p>
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		<p>system we may object to the application on the grounds of the non-sustainable impact on the environment and our customers. We will separately review the impact of any foul discharges.</p> <p>2. Where a development will discharge less surface water to the combined sewerage system than current volumes from that site we are unlikely to object to the application. We will separately review the impact of any foul discharges.</p> <p>3. Where a development will not discharge surface water to the combined sewerage system we will review the impact of the foul discharges but are unlikely to object to the application.</p> <p>4. Where a development will connect surface</p>		
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		<p>water into an existing surface water sewer, subject to EA agreement and flood risk assessments being accepted, we are unlikely to object to the application. We will separately review the impact of any foul discharges.</p> <p>Where we object to a development but it is ultimately approved, we will build the impact of the development into our plan.</p>		
11	<p>Whilst SOS understands that the STW's permit does not cover discharging Coliforms including E.coli into the Swale through its outflow pipe, this subject is of great concern to the public. Recent samplings at the</p>	<p>The Urban Waste Water Treatment Directive (UWWTD) was implemented in 1994. Following Brexit, the UK continues to rely on the 1994 regulations, which were brought into EU law when the</p>	<p>What is the population equivalent served by Richmond STW?</p>	<p>APR25 has a population equivalent (including trade and visitors) of 9579.</p>

	<p>outflow have revealed alarmingly high coliform counts -eg. 126,000 counts per 100ml on the 30/10/24 and 250,000 counts per 100ml on the 21/3/25. The health of the public, domestic and wild animals surely requires that treated effluent needs to be passed through UV filters before discharge into the river?</p> <p>SOS have updated coliform counts for Richmond STW outflow pipe as follows:</p> <p>08/08/2025 520,000 counts per 100ml</p> <p>20/08/2025 540,000 counts per 100ml</p> <p>26/08/2025 490,000 counts per 100ml</p>	<p>UK was still a member.</p> <p>The Environment Agency (EA) regulates STWs by assessing the quality of the waste water they discharge against set compliance limits. The level of treatment and monitoring that is needed is based on the population the STW serves, and where the sewage is discharged.</p> <p>Tertiary treatment (such as UV or similar disinfection to remove more pathogens) is required for STWs that serve a population equivalent of more than 10,000, and that discharge into "sensitive areas". It is for the EA to</p>		
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		stipulate whether or not a STW is within a sensitive area, and as such whether it needs to have tertiary treatment, however for reference, one example of what constitutes a sensitive area is a designated bathing water area.		
12	SOS learned that a number of other YW STWs have introduced phosphate strippers into their plants so as to improve the quality of the treated effluent returned to the river. Could this not also be done at Richmond? Phosphate levels have been high eg. 15.4 mg/l at the site's outflow pipe on the 21/3/25 and 12.9 mg/l on the		It would appear that this question has been ignored.	<p>Please accept our sincere apologies this was omitted from our previous response.</p> <p>The EA stipulate which watercourses require Phosphate removal and the Swale at Richmond is not amongst that list at this present time. YW will only receive funds to carry out works where the EA require these projects.</p> <p>Water companies can only fund a phosphorus (P) removal scheme if approved at the price review by OfWat. Approval would be related to either:</p> <p>WINEP - where if the receiving watercourse is not achieving good status due to phosphorus and the water industry was identified as the cause, the treatment works would have a planned removal scheme - this is not the case at Richmond where the Swale from Clapgate Beck to Bedale Beck waterbody</p>

	4/2/25. It cannot be in the interests of the river's ecology to have such high levels entering the river and these levels may explain, eg, why there is a relatively healthy invertebrate count upstream of the STW, but a NIL count at Brompton.			has High status for phosphorus (the best possible) - Swale from Clapgate Beck to Bedale Beck Catchment Data Explorer Catchment Data Explorer or UWWTR - where a waterbody has been designated as a sensitive area <u>and</u> the WwTW discharging to it serves a population equivalent (PE) of >10,000, or the PE is >100,000 regardless of receiving waterbody status, the works would have a planned removal scheme. The River Swale has not been designated a sensitive area for eutrophication - Sensitive areas map: Yorkshire - GOV.UK and the PE for the site is below 10,000 so would not qualify under either parameter.
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1	Can you confirm when the Reeth Road and Riverside Road CSO works are going to start, what will these works consist of, and how are these projected to reduce the sewage dumping figures for these sites?	There will not be any work undertaken in regard to the AMP7 storm spill programme. Whilst these sites were heavily investigated, our regulatory requirements limited our ability to proceed with a solution for the site, and so a decision was made	It was reported in the D&S Times on 28/6/24 that £900,000 was to be invested in Riverside Rd CSO and works would be completed by end of 2024. Why has this changed? Besides, regulatory requirements do not limit your ability to proceed with a solution for the sites. These are commercial decisions. Then On 17/9/25 the local BBC news reported that you had told them 'Projects were underway at Reeth Rd, Riverside Rd and The Batts CSO.' What are these 'projects', when are they starting, when will they be completed and what is actually involved?	With regard to the works reported for £900,000 investment at Riverside Road CSO, we could not deliver the solution by the regulatory date. The regulatory delivery date does impact our ability to proceed with solutions, when we are unable to deliver the solution by the regulatory date we are unable to obtain the funding for the work. This is driven by the regulatory requirements opposed to commercial decisions. In regard to the BBC article, the information we provided was related to the work undertaken at the Batts CSO. We provide this information to you on the work completed here in an earlier response.

		for these sites to not have a solution delivered by the storm spill programme.		<p>A detailed UMON survey is being undertaken on the Swale to investigate and identify solutions. As part of this work we will undertake investigations and surveys.</p> <p>We currently have no planned works for deliver in AMP8 storm spill programme as advised in our original response. Please accept our apologies that we reference AMP7 opposed to AMP8 in the previous response.</p>
2	<p>Sewage dumping figures for The Batts CSO doubled between 2023 and 2024, (586.5 hours last year), and have been a concern to our supporters as a primary contribution to river pollution. As you know from the footage Channel 4 News sent to you on the 27/3/25, The Batts was dry dumping into the Swale, although this was not recorded on your CSO monitoring map. It has been dry</p>	<p>This has turned into a much bigger job than what was first anticipated. Over pumping was deployed on the 16th of June to bypass the flows to the CSO and prevent any further spills. On site the plan is to deconstruct the CSO chamber, remove the deteriorating scum boards and re-build the weir wall. This work is still in progress.</p>	<p>This appears to say the existing CSO is being refurbished as it stands. However, what is being done to improve capacity and prevent dry dumping?</p> <p>Confusingly, we were informed by River Health on the 18/8/25 that 'The Batts CSO repair has been successfully completed...'</p> <p>Please confirm whether or not you are doing work on the Batts CSO, and state when this is due to be completed.</p>	<p>The Batts CSO repair has now been completed. The weir walls have been refurbished that will prevent the flows from infiltrating through into the overflow line and out to the River Swale. The contractor (Trenchless) still has site remediation work to complete, including the repair of a dry stone wall and removal of the fencing.</p> <p>There are no plans for additional capacity at the Batts at this time. The CSO has been refurbished as an interim measure to reduce spill level at the site and support the existing capacity of the site. Performance of the site will be monitored following this fix to allow us to understand the impact this has had and the reduction of spills delivered.</p>

	dumping since then also, and operatives have been working there. Could you please explain what is going on at The Batts CSO, what works are being carried out and how these works will reduce the sewage dumping figures here and end dry dumping?			
3	In December 2024 you informed us that the Batts CSO had been investigated by YW but there was no model. How did this investigation assess hydraulic behaviour over a range of flows without any form of model? You also informed us at that time that a full model of all overflows would be delivered in February 2025. Was this delivered, and if	An investigation was undertaken which suggested surface water separation, SuDS, lining where appropriate. Storage was quickly ruled out as return flows and volumes couldn't be accurately determined. Ultimately due to the lack of model information and the knowledge that model data would be available.	YW informed us in December 2024 that a full model of all overflows would be delivered in February 2025. Was this delivered, and if so, what does it indicate in terms of capacities and settings?	<p>The modelling required for the Storm Overflow Assessment Framework (SOAF) investigation has now concluded. The investigation found that The Batts CSO was having no quantifiable water quality impact on the ecology in the watercourse and that with its current performance the watercourse was achieving the standards required to meet Water Framework Directive (WFD) high status</p> <p>The work we completed as part of the Batts CSO SOAF assessment included and full model build and verification of the Richmond DAZ. The modelling work included a historical verification of the CSOs against EDM/Telemetry for spill frequency only, assessing CSO capacity/settings was not part of our scope.</p> <p>As assessing CSO capacity and settings was not part of our scope, for the purposes of paragraph 12(4) a public authority may refuse to disclose information to</p>

	so, what does it indicate?			the extent that (a) it does not hold that information when an applicant's request is received.
4	From the 2/4/25 - 3/4/25 Yorkshire Water had a tanker on Mercury Bridge pumping out sewage from a manhole cover near Richmond Sso (which also discharged for more hours last year than in 2023). Please can you explain what the problem was here, how it has been dealt with and whether it involved dry dumping from Richmond Sso? If the latter, what works will you be carrying out to ensure that sewage dumping figures are reduced and dry dumping ended?	This work relates to the CCTV survey / root cutting work downstream of The Batts CSO. An investigation was undertaken on the network due to the high-level alarms at The Batts CSO. A combination of roots and silt was removed from the 450mm sewer, along with a defective patch liner that was subsequently re-installed.	This response appears to address the works in June on the Batts CSO not the Richmond SSO in April. Our question relates to an area just downstream of Mercury Bridge. Is this the area your reply relates to?	<p>Please accept our apologies, that our previous response was not clear. In reviewing the assets in the area, we have no asset recorded as Richmond SSO.</p> <p>In reviewing the assets we have mapped in the area which are Batts CSO and Lombards Wind CSO against the dates you provide the work related to cleaning and survey work of the 450mm sewer that runs from The Batts CSO, through to Mercury Bridge, for a desilt to reduce pollution risk.</p> <p>This desilt activity was then completed downstream to Lombard CSO.</p> <p>Due to the equipment required for the job and the vehicles required, there was two way traffic management at Mercury bridge to allow for the vehicles to be stationed here due to restricted road access in the area. It was connected to a sewer desilt opposed to spillage.</p>
5	Of the £1.5 bn YW has earmarked for making improvements to	£10.5m	Improving which CSOs along the Swale?	<p>Following sites in the AMP8 programme.</p> <p>BELLERBY/STW</p> <p>CATTERICK BRIDGE/CSO</p> <p>COWESBY/STW/6XDWF OVERFLOW</p>

	CSOs between 2025-30, could you please state how much has been set aside for improving which CSOs along the Swale?			<p>CONSTABLE BURTON/STW THORMAMBY/STW HUSTHWIATE/STW GILLING WEST/STW MARSKE/STW NORTON LE CLAY/STW REETH/STW SINDERBY/STW/3XDWF OVERFLOW SKEEBY/CSO SNAPE/STW/x3 OVERFLOW HUNTON/STW NEWTON LE WILLOWS/STW</p> <p>All discharge to Swale or a trib of Swale.</p>
6	Finally, what facility is there for reviewing priorities within the incoming AMP8 installations across the networks?"	How Yorkshire Water spends its waste water budget it largely shaped by environmental legislation and policy. This includes: Urban Wastewater Treatment Works Directive 1994, Environment Act 2021 (including the Storm Discharge Reduction Plan), and the Water	<p>What facility is there for reviewing priorities within the incoming AMP8 installations across the networks?"</p> <p>Your response deals with targets but does not explain whether everything is set in stone or not. Can these targets be re-prioritised?</p>	<p>Our AMP8 schedule of works is intricate and may need to be adjusted. Timing of activities are dependent on the condition and availability of assets, which are continually monitored. As such, changes to the programme may be required to accommodate unforeseen issues or developments related to asset status. This is continually assessed against the cost of a project and the benefits this would deliver for our customers and the environment, so long as we can justify to the regulator OFWAT the benefits of a scheme.</p> <p>We accept there may be some flexibility within our planning to ensure that all works are completed efficiently.</p> <p>Any work that is associated with the WINEP (Water Industry National Environment Programme) is</p>

		<p>Framework Directive.</p> <p>In reference to storm overflow upgrades, the Environment Act specifies that water companies must upgrade all storm overflows by 2050. This includes hitting the discharge reduction target of less than 10 discharges a year, as well as causing no environmental harm. There are a number of interim targets that are set within this:</p> <ul style="list-style-type: none"> • The headline target must be achieved for most (at least 75%) of storm overflows discharging into or near 'high priority sites' by 2035, and 100% completion by 2045. • 100% of storm overflows entering bathing waters must be upgraded by 2035 		<p>guaranteed to be carried out in full. This means that all tasks and projects connected to WINEP are considered firm commitments and will be undertaken as planned.</p>
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		<p>(Yorkshire Water have committed to achieving this by 2030 for inland bathing waters)</p> <ul style="list-style-type: none"> • Water companies must achieve this target for all remaining storm overflows sites by 2050 <p>Another large section of Yorkshire Water's environmental investment surrounds phosphorous removal schemes, reducing the risk of eutrophication in our waterways. This is guided by the following legislation:</p> <ul style="list-style-type: none"> • The Environment Act specifies that water companies must reduce phosphorous loading from final effluent by 80% by 2038 (from a 2020/21 baseline) • The Urban Wastewater 		
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		Treatment Work regulations ensures that sewage works have appropriate nutrient removal processes that have large population equivalents, or that flow into sensitive areas (see table below)		