

Securing a Clean River for People and Wildlife in Ilkley

Ilkley Town Meeting 26th October – Ilkley Clean River Group Briefing

The meeting will give the town the opportunity to

1. Understand the Yorkshire Water proposal to Ofwat to clean up the river at Ilkley
2. Understand the implications of the wider plans for Yorkshire for customers' bills

Introduction

The campaign for Ilkley has used Bathing Status, Citizen Science, a bottom-up network of campaign groups around the country, collaboration with national campaigners, and the media, to create pressure that has led to policy changes as well as a welcome investment by Yorkshire Water to provide the infrastructure needed to clean up our river and make it fit for people and wildlife, we hope by 2030. The solution at Ilkley could be the blueprint for rivers across the country, showing what is possible and what it costs.

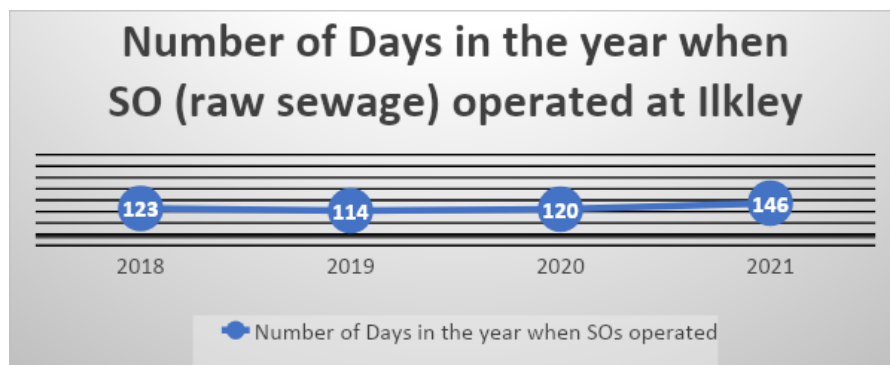
National Context

- Water companies poured raw sewage [into rivers and seas 372,544 times](#) in 2021, for 2.6m hours; 301,000 times in 2022 for 1.75m hours (drought year).
- We (the public) thought we were paying for our sewage to be treated and are outraged that our rivers are being used as open sewers. You will have seen the documentaries (most recently CH5 [Swimming in Sewage](#), and BBC Paul Whitehouse: [Our Troubled Rivers](#) featuring Ilkley's campaign).
- All of our rivers in England are polluted, with only 16% meeting the criteria for good ecological status and none meeting the criteria for achieving good chemical status.
- The target date for 75% of English rivers to be rated as good is now 2063 - that's 40 years away.
- Water company rationale has historically been that 'spilling' sewage into rivers stops household flooding, and the regulator's historic view has been that cleaning up rivers and seas is unaffordable. Often water companies refer to the 'Victorian sewage system'.
- It is legal to pollute in extreme weather but we believe day to day discharge of untreated sewage is not compliant with the law but has still become almost routine.
- This has become an election issue, as hundreds of campaign groups across the country have started testing their water quality, applying for bathing status and lobbying their MPs. Ilkley Clean River Campaign is supporting hundreds of local groups with briefings, 'how to' seminars, and funding for water testing.

The Story at Ilkley

- The campaign started in 2018 after two years of local people persistently reporting untreated sewage discharges. We set up a citizen science testing process and proved that the river water was a danger to people after these discharges. It was dangerously polluted all the time just downstream of the sewage works. We also published the number of times Yorkshire Water was dumping untreated sewage into the river (as agreed with the Environment Agency¹) and reported the disgusting pollution of the pathway and river from popping manholes along the riverside. Finally, we found that the treated sewage, discharged all the time, wasn't treated well enough and needs disinfecting.

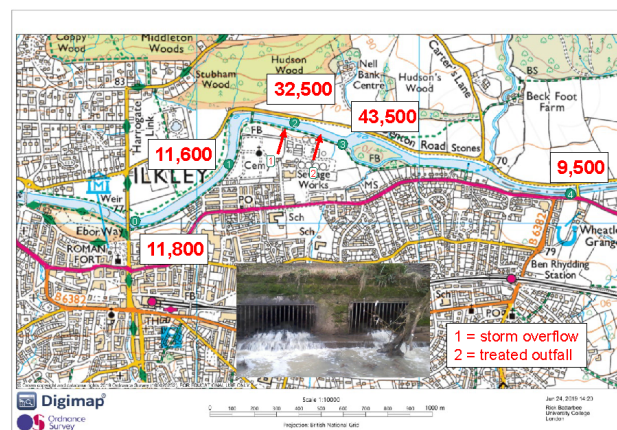
This is the number of days raw sewage is discharged into the Wharfe at Ilkley. That's 1/3rd of the year.



And here is the citizen science results from the start of the campaign:

Note for the river to be safe for people to paddle, play and swim it has to be no more than 900 E coli cfu/100ml. In rain it is never safe.

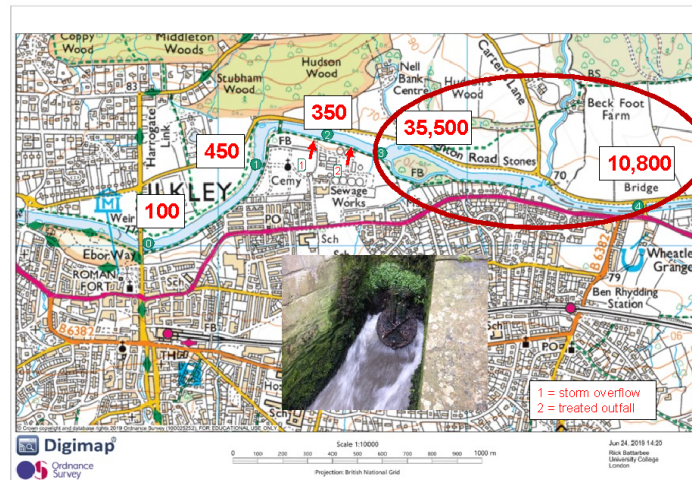
Ilkley Wharfe: *E. coli* (cfu/100 ml) during high flow and a spill (13th June 2019)



- The Environment Agency (EA) grants permits or licenses for storm overflows at sewage treatment works and combined sewage outflows (CSOs) which enable water companies to legally discharge sewage into waterways. These permits set out the rate of sewage inflow to these which can trigger the resultant 'spilling' of raw sewage discharged into the river.

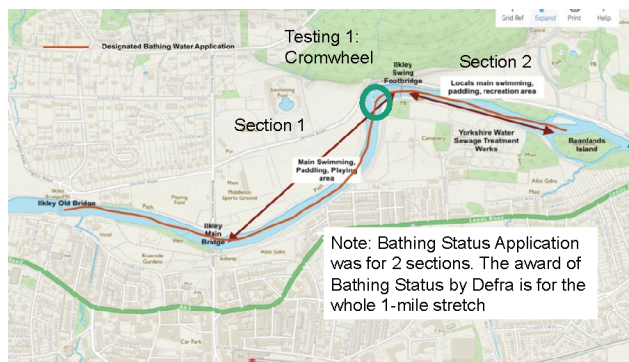
But in dry conditions it looks like it is safe above the footbridge

Ilkley Wharfe: *E. coli* (cfu/100 ml) during low flow (10th July 2019)



- The only way we could find to get the Environment Agency to test the water regularly and to put up signs to warn the public about the pollution was to get Bathing Status. We are the first river in England to get Bathing Status (December 2020), which has brought masses of publicity and media attention to the problem of sewage pollution. This Bathing Status designation lasts 5 years. If there is no improvement the site is 'de designated' by DEFRA (i.e. December 2025).

Ilkley Bathing Designation



Testing 2: Stepping Stones below the designation.

Note the EA has always had (investigation) in its title for this site it is not a classification point. Even though our application for designation was for the whole stretch, and our agreement (chaired by Ofwat) in June 2020 was that the whole stretch would be approached in the spirit of the application.

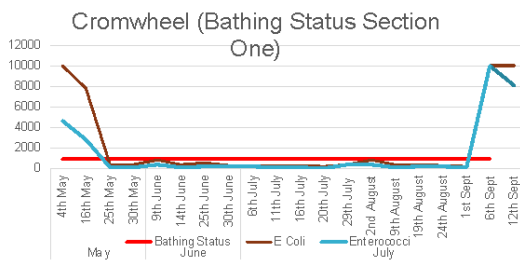
- Our river is now tested during bathing season by the Environment Agency at two sites and these are the results. Our river is classified as 'poor' quality this means it is not safe for people to paddle, play or swim in the river..

Environment Agency Testing Results

The EA tests weekly (not daily) during the bathing season (May to September). The minimum safe standard (called “sufficient”) requires the concentration of *E. coli* to be less than 900 cfu/100 ml throughout the season (red line on graphs below) anything above the red line is unsafe water quality. Note: 2022 was the drought year, with very little rainfall.

Bathing Status Data 2022

Wharfe at Ilkley Bathing Status Section One
Main Bridge to the Swing Bridge
'Cromwheel' testing site

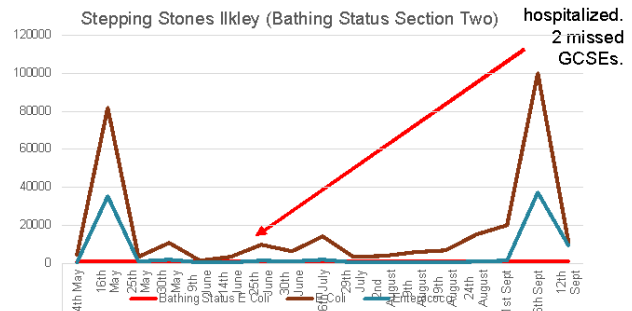


Note scale to 12,000

Section 1 data (Cromwheel)

https://environment.data.gov.uk/bwq/profiles/profile.html?_search=ilkley&site=uke4100-08901

Wharfe at Ilkley Bathing Status Section Two
Swing Bridge to Beanlands Island
'Stepping Stones' testing site



Note scale to 100,000

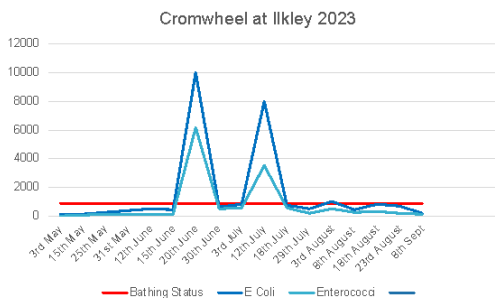
Section 2 data for

Beanlands https://environment.data.gov.uk/bwq/profiles/profile.html?_search=ilkley&site=uke4100-08902

Note Sufficient water quality for paddling, playing and swimming is 900cfus (red line on graphs)

Bathing Status Data 2023

Wharfe at Ilkley Bathing Status Section One
Main Bridge to the Swing Bridge
'Cromwheel' testing site

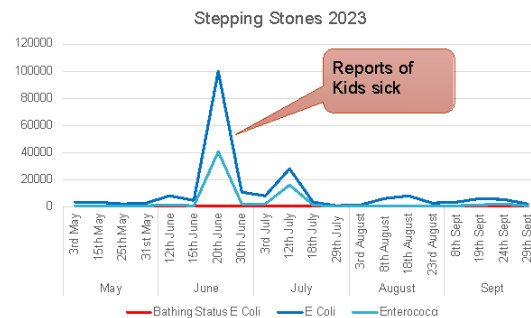


Note scale to 12,000

Section 1 data (Cromwheel)

https://environment.data.gov.uk/doc/bathing-water-quality/in-season/bathing-water/uke4100-08901.html?_page=4

Wharfe at Ilkley Bathing Status Section Two
Swing Bridge to Beanlands Island 'Stepping Stones' testing site



Note scale to 120,000

Section 2 data for

Beanlands https://environment.data.gov.uk/bwq/profiles/profile.html?_search=ilkley&site=uke4100-08902

Note Sufficient water quality for paddling, playing and swimming is 900cfus (red line on graphs)

Testing To Understand The Pollution.

We partner with the EA, Addingham Environment Group, Yorkshire Dales Rivers Trust, and others in the [iWharfe project](#) to understand water quality in the Wharfe from source to end. Results from the studies show is that it is important not only to control spills of raw sewage, that occur frequently in Ilkley and Addingham, but also the need to remove phosphorus from the final (treated sewage) effluent from Ilkley and other STWs downstream. This is now in the YW plan for 2025-2030.

What Yorkshire Water Has To Comply With.

1. The Storm Overflow Discharge Reduction Plan (2022) requires that:
'By 2050, no storm overflows will be permitted to operate outside of unusually heavy rainfall or to cause any adverse ecological harm.'
2. For bathing sites that there must be no more than three sewage discharge events within the bathing season (May to end September) and must be no more than 10 per annum by 2050. A maximum of 12 hours is one event. Note: there is nothing in the plan about volume of the discharge.
3. In addition, there are multiples challenges going in the courts as the 1994 legislation states that no untreated sewage should be dumped into the river outside exceptional circumstances.
4. The Environment Agency issues the permit for the STW which sets out at what level of inflow YW is allowed to put untreated sewage in the river. We have been promised a review of that permit for nearly 2 years. It currently 'allows' discharges on 1/3rd of the days of the year. We are still waiting.
5. Yorkshire Water needs to secure a good/ excellent status for the river at Ilkley in order to retain Bathing Status.

What Has Happened So Far?

Yorkshire Water has invested in a £11M+ to divert sewage from the river to the sewage works with the new tunneled big sewer which becomes operational by early 2024. This is part of the plan to get to 1 sewage discharge within the Bathing Season. The aim is to secure at least 'sufficient' water quality to retain the bathing status classification.

What Next?

Ofwat has recognised (as a result of public opinion) the amount of work that needs to go into river Bathing Sites to secure good water quality for people and wildlife. They have sped up the plan for Ilkley through the 'accelerator' programme – this means Yorkshire Water can seek to make big changes in Ilkley to clean up the river starting by 2025. The usual cycle of investment is a much longer process and the next round of this is called AMP8. The submission of the business plans (Accelerator and AMP8) have been submitted as part of the Price Review (PR24). Ofwat will review the plans and make a decision by the end of 2024 – both on the plan's content and the impact on the price to customers (our bills). This means that there should be spades in the ground to reduce the pollution at Ilkley by 2025 when Defra review the bathing status.

Yorkshire water has submitted a plan for the following which include additional capacity (Accelerator) and better treatment of the treated sewage (AMP8). The costs of the Accelerator proposal is £61.5M for Ilkley and Addingham. This is what it will be providing...

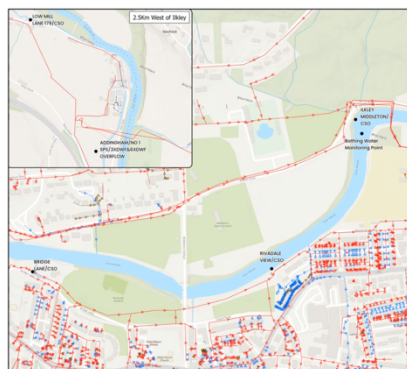
AMP 8 Investment

Accelerated Infrastructure Delivery Project

- Storm Overflow reduction to 1 spill per season and 10 per year, on average:
 - Ilkley Middleton CSO
 - Rivadale View CSO
 - Bridge Lane CSO
 - Addingham SPS CSO (3X DWF and 6X DWF)
 - Low Mill Lane 179 CSO
 - Ilkley STW CSO (3X DWF and 6X DWF)
- Increase capacity and treatment processes at Ilkley STW

AMP 8 Business Plan Proposals

- Additional dynamic bathing water model to understand additional impacts from upstream to bathing water compliance at Cromwheel.
- Phosphorus removal at Ilkley STW



We do not know what this actually means in terms of solution. Nor do we know enough about it to challenge the costs. YW promises innovation in the business plan but we don't know what that means for Ilkley. At the moment our reading of the business plan is for a lot of storage tanks rather than, for instance a new STW for Ilkley and Burley which could be a better longer term solution.

The plans for Ilkley are part of the whole plan for Yorkshire. As yet we haven't reviewed the total plan for rivers across Yorkshire. You will have seen in the press that YW is proposing to increase bills to stop polluting to the level that is damaging our rivers and seas.

Bill Increases

YW bills average currently £419 (2022/23). By 2030 bills will be £585 an increase of £166pa = £13.83pm a total of 39.6%.

- 2023/24 - £419 current average (34.92)
- 2024/5 - £438.12 (£36.51 a month)
- 2025/6 - £518.76 (£43.23)
- 2030 £585 (£48.75)

Yorkshire Water serves 2.3M households. That proposed price increase delivers £4 Billion per annum by 2030.

It is unclear how much of our bill increase is to service debt rather than pay for services.

We also note that Ofwat has identified that between 2020 and 2022 Yorkshire Water only spent 20% of their wastewater enhancement allowance.

David Black, the CEO of Ofwat, has visited Ilkley and has written to us assuring us that we won't pay twice.

Finally –Any issues not addressed at the Town Meeting you can also take to Yorkshire Water's 'Your Water Your Say' on their PR24 business plan which will be held online on 23 November 2023, at 6pm. Registration will go live on their website [here](#)

About Ilkley Clean River Group

We are a group of Ilkley residents who thought that the problem was obvious and the solution complicated - but possible. Five years on, we still believe this. You can find our constitution below, and you can sign up for our newsletter, or volunteer to help by emailing ilkleycleanriver@gmail.com (note spelling!) or follow us on X at [@CleanIlkley](https://twitter.com/CleanIlkley)



Ilkley Clean River Group Constitution

Endnote

What might executive directors be paid under the remuneration policy for 2023?

The charts below indicate how much the executive directors might receive under the remuneration policy for 2022/2023 on a fixed, on-target and maximum basis.

