



## Cleaning up our Rivers – the Ilkley Clean River Group Campaign

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It started with frustration. Kathleen and Steve had been reporting the Wharfe's decline at Ilkley for years using the Environment Agencies incident reporting system. Systems like this pervaded the Agency's response to us over the 18 months that followed, somehow missing the point of the regulator's role which is to protect our national assets on our (the public) behalf. Karen took up the cause and started reporting the multiple incidents when the 'storm overflow' the pipe that bypasses the sewage works treatment dumps untreated sewage straight into the river. Karen was outraged and asked me for help, and brought along Rick (emeritus prof of environment change at UCL) who lives locally. The Ilkley Clean River Group met and agreed an emerging plan to stop raw sewage discharges and restore our river to its previous health. This was July 2018.

18 months later we have shown that sewage discharges are normal and regular practice; that despite the agencies assertions that everyone knows it's happening, the public are actually outraged about it; and that these sewage discharges are a threat to people's health. We have found out that the Environment Agency is disingenuous with the facts, painting a picture, based on partial data, that is far too rosy – stating river quality is good when its actually failing; that the UK interpretation of EU Law stretches it to the point of ridicule, with the EU stating that sewage discharges (called storm overflows – the name indicates the intent!) should only take place in exceptional extreme weather, whereas the EA interpretation is 40 'spills' average over 3 years or >60 in one year.

We have found that Yorkshire Water has not been maintaining our sewage infrastructure in Ilkley, with manholes overflowing sending sewage solids onto footpaths, un-investigated infiltration, and sewage solids on the riverside where people picnic and play. We found that the river at Ilkley was not being tested at all by the EA to measure water quality. We have found a cultural narrative across the industry that discharging raw sewage is known about, acceptable, and too expensive to fix. We have challenged every one of these beliefs, behaviours, and management practices.

But the biggest find was that the level of *E. coli* in the water below the sewage plant where locals congregate is 40 (dry weather) to 50 (rain/ storm overflow) times the level identified by Defra as acceptable for bathing waters. Further upstream where lots of people paddle, play and swim the river has acceptable levels in dry conditions but again breaches bathing quality in rainfall by 12 times. This means that the river is a danger to public health in these conditions and is always a danger below the sewage plant.

Over these 18 months our group has grown with the support of RSA Fellows in Ilkley and local residents with 50 volunteers supporting the groups' activity and Rhys and Martin joining the core group. We have captured the national mood, and the ongoing media interest reflects the

outrage that we feel about the quality of our river with Karen calling it the industry's 'dirty little secret'. The Ilkley group have been called 'pioneers' and 'game changers' and so to help others we are sharing the key ingredients of our campaign:

1. Start with understanding what's really going on.
2. Be clear about what we are going to achieve
3. Use diversity as a strength – making the most of everyone's views
4. Work with the powers we have locally
5. Bring agencies accountability to their front door
6. Turn up the heat so no one can walk away
7. Use language that describes reality
8. Build relationships for the task – sometimes collaborating sometimes adversarial.

1. Start with understanding what's really going on.

Thank goodness for Rick. Rick knew we needed to understand the quality of the river, so he developed the UK's first Citizen Science river testing protocol for coliform bacteria and put it into action. This gave, and continues to give, vital data about the river that cannot be challenged. When we demonstrated the levels of *E. coli* in the river, the counter narrative from the agencies was that a large proportion was probably from livestock. Rick and Steve tested all the tributaries into the river and showed that the livestock pollution was dissipated by the main river at the times they sampled with the sewage works and upstream CSOs being the main polluters that affected the river here.

We worked with the Town Council to secure EA monitoring at Ilkley to see if the river is compliant with the Water Framework Directive. The WFD is a one out all out approach so a fail in one testing area means we fail overall. Ilkley fails on one key biological test although the EA surprisingly continues to maintain the water quality is good. The EA has been testing now for a year.

The next issue was how often the 'storm overflow' was discharging sewage into the river. As Yorkshire Water didn't have Event Duration Monitoring (a legal requirement but not until end March 2020 – it finally went live at Ilkley a month ago), we relied on data provided under FOI by the EA and on request from YW. Whilst the EA and YW teams were really helpful explaining the data they provided, it didn't on its own answer our key questions of the conditions under which the sewage was being discharged and the duration of these discharges. We poured over the data counting the minutes and hours, and it was the Wharfedale Naturalists Society (who measure local rainfall) who helped us demonstrate that the Ilkley works are discharging at 8mm of rain, a level that far exceeded the EA's requirement for investigation (>60 events in a year). However at this point we ran into the cultural difficulties – the EA sometimes referring to the same data as us and presenting it back as evidence, and sometimes saying the same data method wasn't good enough to prove that Ilkley was a 'high spiller'. Their cycle of measurement, investigation and implementation, each taking 5 years, backed up by pages and pages of requirements (the Storm Overflow Assessment Framework) whilst pragmatic from a funding perspective did not match local expectations.

Kathleen's idea for Bathing Water status was picked up by our MP John Grogan and was another turning point in the campaign as in order to apply we had to demonstrate public use of the river. Over the summer months we counted adults and children paddling, playing, swimming in the river and on the riverbank over several days every week. We kept public records and took photos showing at its peak 1751 people one hot summer day in July, with a pattern of use in good weather of hundreds and hundreds of people.

All of these together gave us a data picture of the river, its quality and its use that demonstrated the problem in a way that was accessible to local people and the media.

## 2. Be clear about what we are going to achieve and don't get distracted

We used the Urban Waste Water Directive's definition of extreme weather, checked that against Met Office reports of the same, and set the goal of discharging only in these situations – not unreasonable since it's the law! For the Ilkley Sewage works that would be 2 events a year. Our goals are therefore:

1. Stop Yorkshire Water pumping solids onto the riverbank and into our river
2. Allow Storm Overflows to occur only in extreme and exceptional weather conditions – likely to be 2 times a year.
3. Upgrade our sewage system so it can cope with our population (current and predicted) and our climate (current and predicted).

This will help to restore our river, so our environment and ecology can thrive and people and children can paddle and play safely in our river and on the riverbank.

This focus informs all our activities. At the outset there was the danger (and still is) of being sucked into a national agenda – with the EA concerned that the solution for Ilkley would be unaffordable and would escalate across the country. There were moves to get us to engage on this as a national issue. We refused and kept focused on our issue locally, knowing that if we solve the problem here it is replicable.

Our current work on testing the whole of the Wharfe will generate a more complete picture which is generalisable for many rivers in the north of England (as they are all similar landscape and usage) which means no one else should need to do the same level of testing we have done here in Ilkley and along the Wharfe. to make the case for action

## 3. Use diversity as a strength – making the most of everyone's views

Our group comprised the full range of interests in Ilkley from anglers, to people interested and engaged in local wildlife to wild swimmers and to residents who enjoy walking by the river. We brought diverse skills together so that between us we could cover the science, the data, the politics and the media.

Our engagement approach was to collaborate with local interested groups to support our activities (the testing, the people counting), with local politicians and councillors to get the agencies attention, and local organisations to help us deliver (schools/churches to host meetings etc). This really is a town campaign.

And we made friends nationally with the whole gambit of groups concerned about water quality from Feargal Sharkey leading the charge on chalk streams to the Outdoor Swimming Society, to others campaigning like us e.g. Windrush and the Rivers Trust Fifty rivers Fit to Swim in Campaign. These friends have encouraged us, shared our work, and helped us when we've got stuck.

## 4. Work with the powers we have locally

Our first port of call was our Town Council to help us get the agencies attention (both EA and YW) by asking them to present at a Town Council Meeting. The TC was shocked to learn about the spills and took up the issues writing to the EA and YW to secure the first steps of action. They also funded the Citizen Science testing. This was localism in action.

Our MP John Grogan took up the reins securing meeting with us with the EA Chief Executive, who, on seeing our data demonstrating the level of pollution said that ‘the case is made’ and promising action quickly (it didn’t happen...). John also secured meetings with the CEO of Yorkshire Water and regular update meetings with both agencies representatives as an action plan was formed.

#### 5. Bring agencies accountability to their front door

The EA in particular was intent on directing our energy to reporting via the EA hotline. This was clearly going nowhere as in their view YW was acting legally. Our case was that their interpretation of the law was incorrect, and that there was moral outrage that the EA was presiding over pollution at this level. Our approach was to tap into this public outrage, and disbelief – something the agencies did not understand.

The public paid their water bills expecting their waste to be treated, the fact it wasn’t and it was polluting the river to the extent that it was a public health hazard was shocking. There was also the backdrop of the size of dividends being paid to international corporations and pension funds whilst our rivers were degraded to open sewers.

We used two methods to deliver the Agencies responsibilities to them:

- (a) Town Meetings – sitting in concentric circles with the agencies in the middle the Ilkley residents surrounded the agencies and our politicians. Data packs were distributed in advance along with briefings so people came informed. Key questions, based on the agency’s roles and mission statements, were devised to hold the agencies to account to us as customers and as taxpayers. We held these Town Meetings every 6 months attracting 100+ people the first time and circa 70 from thereon. We invited the media and the first one was broadcast the same day by BBC Look North. We filmed the meetings and put these films up as public records on our website, clarifying every statement made. Our approach has been to make transparent the statements, actions and issues.
- (b) Media campaign - working with the media has been vital to the campaign. Our clear data, clear goals and beautiful photogenic river created the perfect conditions for the media. From The financial times developing the story of corporate payouts, to the Times focusing on bathing status and water quality, to the Guardian responding quickly to updates on the EAs response, to national TV featuring on the BBC and Ch4 news—our campaign and its clarity has proved to be very newsworthy. From January to March 2020 there were 9 newspaper articles, a piece on the World at One, Channel 4 news and Look North.

#### 6. Turn up the heat so no one can walk away

Each of the new items were based on data, photographs and stories. We provided these on our website so it was always an up to date source of information for all. We picked these carefully to make it impossible for the agencies to walk away. For instance, the pictures of the manholes popping and sending raw sewage onto the footpath where children walk to school showed illegal behaviour and lead to YW responding to alarms on those manholes sending cleaning up teams every time.

Alongside the bathing water application requirements of counting people, we also asked for reports of people being ill as a result of being in the river and accounts flooded our social media pages, which we used to demonstrate that people had no idea the river was a public health hazard, and to show the harm being done with real stories.

Pictures of people picnicking on the riverbank next to sewage solids was impossible to ignore, as was Mark Barrow's underwater film of the river where it went from clear to sludge.

#### 7. Use language that describes reality

The agencies depersonalise and re-describe the situation so it comes across as reasonable. The discharges of raw sewage are called 'spills'. Everyday use of the word spill implies an accident happening irregularly. If the language wasn't changed the meaning was so the word 'storm' for 'storm overflow' has become an overflow that can take place in light rain. We refused to use the misleading language of the industry clearly sticking to language that has day to day recognisable meaning.

#### 8. Build relationships for the task – sometimes collaborating sometimes adversarial.

Finally we have developed a range of relationships with the agencies. Where they are trying to secure improvements right now, and investigate the problem, we are helping them – sharing our data and local intelligence and mobilising people to help. We have a joint planning group for the Bathing Water status so that if we are awarded it we are all ready – the EA, YW and Bradford Council.

We report incidents directly to YW as its proving much more useful than the EA reporting (although we continue to do this too) as YW is now responding directly and quickly.

We are working with YW this summer to run a 'Soak it Up' campaign to change residents' behaviour to help clean up the river (diverting rainfall into water butts, stopping wet wipes going down the loo).

However, we continue to hold the agencies to account for their actions. The EA needs to tighten up the inflow level at which YW is legally allowed to discharge sewage into the river, and it needs to monitor transparently and honestly; Yorkshire Water needs to come up with an imaginative future facing solution that cleans up our river now and for the future using the best intelligence and modelling; our MP needs to secure tighter legislation so that agencies can't wiggle through gaps and loopholes. Overall we need all parties from Government, to the regulators (Ofwat and EA) to the water companies, being honest about the quality of our river water, and what it will take to restore it to its previous health and we need local people all.

### The Campaign Design

Whilst some of the campaign has been the very best of luck – a group of residents with the skills to do this, in a picture-perfect setting; some of it has been by design. The principles above come from complex adaptive systems theory, and include Heifetz on adaptive leadership, as well as the wisdom of Edgar Cahn a legal professor and creator of timebanking, who advised me personally.

Ilkley Clean River Group comprises:

Prof R Battarbee, Rhys Davies FRSA, Stephen Fairbourn, Prof R Malby, Kathleen Roberts, Martin Robertshaw, Karen Shackleton

The Campaign group includes fellows of the RSA in Ilkley

### Bibliography

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