

THE SOLUTION IS LESS POLLUTION

ILKLEY CLEAN RIVER CAMPAIGN

Ilkley Clean River Campaign

30 Nelson Rd

Ilkley LS29 8HN

Sir James Bevan
Chief Executive
Environment Agency
Seacole Block
2 Marsham Street
London SW1P 4DF

26th February 2019

Dear Sir James

You will know of the Ilkley Town residents concerns at the number of raw sewage discharges into the Wharfe and the impact on the quality of water in our river. We support the Environment Agency's mission to 'create better places for people and wildlife, and support sustainable development' and with this in mind, on the 7th February over 100 residents attended a Town Meeting to discuss our concerns and seek solutions. The turnout demonstrates the level of concern of local residents in our beautiful spa town about this issue. You may have seen the coverage on Look North.

We were joined by:

- Dr Martin Christmas, Area Environment Manager, was there on behalf of the Environment Agency,
- Emily Brady, Public Affairs Adviser, Yorkshire Water
- John Grogan MP
- and the Town Council Mayor and members.

At the meeting we reviewed the issues, heard evidence from the EA and YW representatives and worked through a number of ways we can contribute both in direct action in reducing run off, and in taking action ourselves to monitor the water quality and outflows from the sewage works. In addition we will be pursuing designated bathing water status for the stretch of the Wharfe at Ilkley. You can see the full report of the meeting and all the Town actions here <https://sites.google.com/view/cleanwharfeilkley/town-meeting?authuser=0>

Our Position

We welcome the short-term additional investment by Yorkshire water to stop solids ending up on the pebble beach, and in the river, and to move some of the inflow to the storm tanks. These improvements don't change the number of spills; they just reduce to some extent the amount of spill. This is not a long-term solution neither does it address the core concerns of the Town.

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Ilkley is a spa town with a significant tourist presence. In the summer people swim, paddle and play in the river. As the weather improves people spread to the area by the outflow to picnic. Neither visitors nor residents knew before our campaign that raw sewage is being discharged into the river and we have numerous stories of people and children being sick after playing and swimming in the river.

In addition water quality in the river is being affected by the discharges. The Ashlands site is within the WFD waterbody from the River Dibb to upstream of Burley in Wharfedale. The ecological status of this waterbody is classed as “moderate” on the basis of fish, “high” for invertebrates, “good” for phytobenthos and “high” for phosphate. The overall classification is therefore “moderate” (= fail), reflecting the score for fish (see EA 2018/84880) as the poorest performing metric.

It should, however, be noted that the “high” status for phosphate is based on the sampling point at Bolton Bridge, and therefore reflects the status of the river above the Ashlands STW.

The WFD waterbody downstream from Ashland is from Burley in Wharfedale to the River Washburn. Here the WFD classification is also “moderate”, but on the basis of macrophytes and phytobenthos combined. For invertebrates the WFD is classed as high and for phosphate the WFD is classed as good (63 µg/l) (see EA 2018/84880). The overall classification is therefore “moderate” (=fail). These data indicate the extent to which the river downstream is suffering from nutrient pollution both from treated and untreated effluents.

Untreated sewage discharges also introduce organic matter and fecal bacteria into the river. These substances are not being monitored, yet these are the key cause for concern for local residents.

This problem is only going to get worse. The anticipated growth in Ilkley up to 2030 is 3000 more people living here. Alongside this, changes in our climate mean winter rainfall for the north of England might increase by between 10 and 20% over coming decades and there is likely to be further increases in the frequency and intensity of high rainfall events¹ both in winter and in summer. Moreover storm overflows in summer, a number of which occurred in 2018, take place when river flow is low and not able to adequately dilute the effluent or even to disguise it.

There are a number of points from the meeting that require Environment Agency action and we look forward to your response.

1. Number of discharges

We welcomed Dr Christmas’ statement at the meeting that the implementation of Event Monitoring to determine if the Ilkley Sewage Plant is a ‘frequent spiller’. However from your letter to John Grogan (12th February) it appears that Ilkley is actually known to be a frequent spiller and the issue now is the extent of that?

The town was not aware that 40 discharges a year is considered acceptable by the EA, and that storm overflow does not happen in storm conditions but rather, in Ilkley, at low levels of normal rainfall. Most recently on the 9th February the Sewage plant discharged untreated effluent at 8mm of rainfall (the rainfall monitoring is taken in Burley, by the Wharfedale Naturalists weather recorder)

The average rainfall days in the UK are 133, so if 40 of these are ‘discharge days’

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then the EA is defining storm as approximately 1/3rd of rainfall events in the UK.

The town understands the British language definition of the term 'storm' as "a violent disturbance of the atmosphere with strong winds and usually rain, thunder, lightning, or snow."

We do not accept that the sewage works should be discharging raw sewage at minimal rainfall.

2. Consent Limit

The Urban Waste Water Treatment directive (UWWT) 91/271/EC requires that:

"Sewage is treated except under unusually heavy rainfall"

We dispute that the Ilkley sewage plant is only discharging at this level as the Wharfedale Naturalists are measuring rainfall in the locality. We can cite 2 specific instances of discharge at low levels of rainfall recorded as an example. You will find details on our website.

The current consent to discharge is operating as a permission to legally pollute the river on many occasions under what cannot be described as storm conditions.

We welcome the new information provided at the Town Meeting that, contrary to evidence given at the Town Council meeting on the 1st October, raising the consent limit would not shut the sewage works down or risk complaint and litigation by Yorkshire Water. This is a change in position of the EA representative.

The Town meeting voted overwhelmingly for the limit to be raised to 'storm' overflow level that reflects the intent of the UWWT.

By this we mean that the new limit should ensure that

1. No discharge happens when the river is low - and when any discharge will leave remnants / deposits on the river bank and beach
2. Discharge only happens in storm conditions (unusually heavy rainfall)
3. That the limit reflects the planned increase in population and changes in climate so it is fit for purpose for the future not just for the present levels of use.

The Town expects to be consulted on the limits and the level at which they are set to ensure the EA is acting on our behalf as a public regulator.

3. Upgrades to the Sewage Works at Ilkley

We welcome the planned increase in storm tank capacity. However until there is a better mechanism to pump the inflow into the tanks when it rains the incoming effluent ends up being discharged into the river. This is a short-term solution that will not future proof the sewage works.

Raising the consent limits will require Yorkshire Water to secure investment in upgrades of the plant and we expect to be consulted on the options for this, including solutions that future proof the sewage works against the planned increase of population of 3000 by 2030 with clear modelling of the impact of the upgrades in relation to both this population increase and changes in climate. At minimum we expect the investment to include diverting surface flow to bypass the plant.

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We understand that one option for securing an upgrade is through an emergency application for AMP, which we would support.

We expect any upgrade to happen quickly to reflect the level of public concern and the on-going environmental damage to the river and threats to public health. At the meeting we were told that any change would take up to 20 years. This is not acceptable to the Town and we expect the upgrade of the Sewage works in Ilkley to take place within the current planning cycle with the full upgrade to an effective plant complete within five years.

We welcome YW initiatives to help schools install SuDS in the catchment but much more could be done by YW to encourage the uptake of SuDS throughout the catchment.

4. Expectations of the EA as our regulator

in addition we expect:

1. To review the results of water monitoring, both the EA monitoring that has recently been instigated at Denton Bridge and our own citizen monitoring and we will be inviting you back to a following meeting to review these results together.
2. The EA to pro-actively model the impact of future development in the catchment, and should actively object to any future housing developments that will have negative consequences for the environment.
3. YW and the EA to collaborate more proactively to monitor the Ilkley site so that there is up to date real time data on frequency and amount of discharges, and water quality. We are concerned that it is only as a result of this campaign that the Ilkley river is beginning to be monitored.

We attach the briefing paper we produced for the Town Meeting for your reference, and the briefing provided for John Grogan.

A number of us work in London during the week, and we would be pleased to discuss this issue with you in person.

We look forward to your response and to securing a sustainable environment for the residents and visitors to Ilkley.

Yours faithfully



Karen Shackleton, Prof Rick Battarbee, Prof Becky Malby, Kathleen Roberts, Stephen Fairbourn

Ilkley Clean River Campaign

On behalf of Ilkley Town residents.

Supported by Climate Action Ilkley.