



THE SOLUTION IS LESS POLLUTION. ILKLEY TOWN MEETING

Campaign for Clean Water in the Wharfe at Ilkley Town Meeting 7th February 2019

The Problem

When it rains raw sewage contaminated water is discharged into the Wharfe. This is because either:

- The amount of water coming into the Sewage works is high (there is a consent limit originally set 17 years ago so that at high inflow in storm conditions the works could discharge sewage directly into the river). Because of rainfall, water running off buildings, closure of the Addingham plant and increased population, this is happening all the time now when it rains.
- The storm tanks are full in lower periods of inflow and are then allowed to overflow into the river.



In the summer we found raw sewage, and solid waste on the riverbank in Ilkley and decided to act.

As we have raised the issue of the pollution in the Wharfe at Ilkley we have found that Ilkley Residents and Visitors don't know:

1. Ilkley Sewage plant discharges raw sewage into the Wharfe when it rains
2. The river is not designated for bathing and is contaminated

This problem is only going to get worse. The anticipated growth in Ilkley up to 2030 is about 700 further dwellings, with an estimated 2760 people (and that's 3000 if we include Addingham). 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 might be further increase in the frequency and intensity of high rainfall events¹.

What We Have Been Trying to Achieve

1. Stop YW Pumping Solids into the River

2. Stop sewage discharge outside storm conditions

3. Get our Plant upgraded to cope with our population and climate

1	To stop YW pumping solids (sanitary products, condoms and faeces) into the river	Partially achieved with the new grills
2	To stop discharges outside storm conditions (which in our view should be irregular exceptional circumstances, rather than regular when it rains) by having the license reviewed to new limits to prevent discharge at normal rainfall.	Not achieved yet as Environment Agency (EA) say plant operating within license and river quality is good.
3	To bring forward the plant upgrade so that it is fully functioning in 2020.	Not achieved

In order to achieve this:

1. The EA Needs to review the Asset Management Plan for this year and the coming 5 years as agreed at the Town Council Meeting to see if upgrade/development of the Ilkley site can be added.
2. The EA needs to monitor the river regularly from now on. We don't know when they are starting. They should provide monthly reports to the Town Council. They are also only monitoring for nutrients (that's from the treated effluent that is discharged all the time and can harm fish). No-one is monitoring the organic levels (that's from the untreated sewage that causes people to get ill if they swim in the river)

3. The licence needs reviewing with the growth of the population. At the meeting the EA said it didn't want to do this in case YW took them to court.
4. We need signs up about the water quality for people that swim in the river. Clearly no-one knows the river is an open sewer when it rains heavily, and since there is no monitoring no-one knows how bad the pollution is, so we also propose that we monitor this as a Town as the EA won't.

We need a new plant in Ilkley to cope with the growing population.

The Issues and Excuses

1. Consent Limits

The Consent Limits set 17 years ago under different conditions, when they were breached infrequently need reviewing. We need higher limits now they are being breached all the time.

Consent limits are calculated by taking the 100 year storm spread over many years. However storms now occur more frequently, our river has more extreme low levels as well as highs, and run-off from paved surfaces has increased. If we take both our river behaviour and the fact we are a spa town with our tourism partly dependent on a river in good quality we have a case for the limits being changed on the consent.

To review the limits the Environment Agency has to acknowledge our river is suffering and not meeting the standards for clean water set out by the European Framework (which is to protect our rivers).

2. The Story So Far About The Environment Agency

The EA claimed the water is in good condition, (as set out under the Water Framework Directive) at Town Council and John Grogan meetings contrary to email from the EA to the Campaign Team saying its Moderate, and our own review of the data (see attached full briefing) which shows it is Moderate. The issue here is:

- (a) The EA monitors for nutrients (the stuff that's in the regular discharge from treated sewage)
- (b) No-one monitors the pollution from organic matter (untreated sewage).

Ilkley Town Council (ITC) have written twice to the Environment Agency asking for a change in the consent limit to realign the storm water discharge levels, demanding more stringency, based on the changes in incoming flow and the changes in river levels since the consent limits were set 17 years ago. On the second occasion ITC told that a permit alteration would only be made by the National Permitting Service in response to evidence of adverse environmental impact. This is not currently (in the eyes of EA) established. The Environment Agency apparently do not wish to change the consent as they don't think the level of discharges are unacceptable.

We found that our river wasn't being monitored fully. The EA has just put in new monthly monitoring on the Denton stretch of the river (downstream) after pressure from the Ilkley Town Council. However this doesn't measure the polluting impact of the 'overflow' of raw sewage.

EA committed at the ITC meeting to find out if it was too late to review the Wharfe Asset Management Plan to secure development of the works at Ilkley. ITC has written to secure a response – no response so far.

3. What About Population Growth?

EA have also made clear in responses to ITC that ongoing permit assessment/modification in response to population growth is outside their remit and town development issues are a matter for YW and planning authorities. We understand that Yorkshire Water does not have a remit for this. An ITC audit of recent larger planning applications identified only 3 out of 15 in which a comment on drainage had been made by YW, in addition to another pre-planning enquiry response. ITC has written to YW to request that (whilst YW is not a statutory consultee on planning applications) that YW engage with the planning process to try and limit avoidable growth in demand for the water treatment facility. To judge this, we have asked them to provide the Town Council with the criteria they use when deciding whether or not to make a response to a planning application.

ITC has written to request information on what forward planning YW is undertaking to develop the treatment capacity in Ilkley in light of the anticipated growth in dwellings up to 2030 (about 700 further dwellings, estimated 2760 people).

4. So What Has Yorkshire Water Done?

As a result of Town concerns YW are upgrading the plant as follows:

- Adjusting the storm overflow weir level,
- Adding pump capacity,
- Replacing the screening with much finer mesh,
- Renewing the Archimedes screws used for water uplift into the system to maximise capacity before storm overflow occurs.

Ilkley Town Council has written to ask for confirmation that all of the planned improvements in are now complete, or for confirmation of completion timescale. We also need to know the impact of these improvements on discharges.

- YW are also promising improvements in phosphate removal during the next phase of development.
- And have investigated infiltration problems with the network and not found any

YW has agreed to fund warning signs.
We suggest:

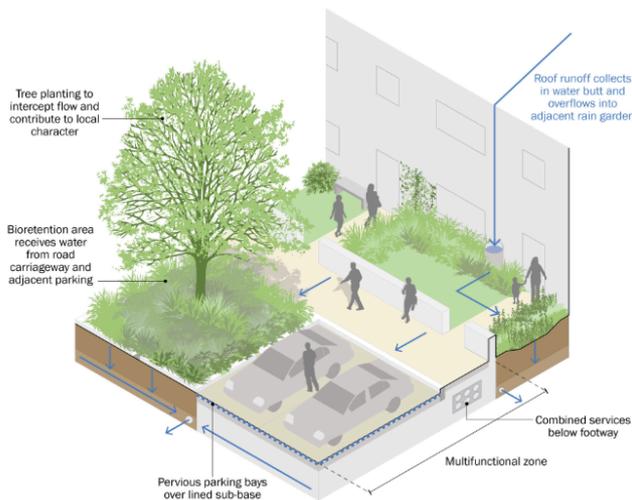
The proposal to introduce signage and wording is to be discussed at Full Town Council meeting on February 4th. At present there is one TC member objecting.

WARNING Raw Sewage is discharged downstream from this point periodically and after rainfall. This river is not designated as suitable for bathing by the Environment Agency. Raw sewage poses a health risk to people and animals

5. What Can We Do As Residents?

Actually we can really help

Installing Sustainable Drainage Systems



We can install SuDS, especially by making hard surfaces permeable, intercepting roof water, creating rain gardens and building soakaways. For example YW have plans to install SuDS at Addingham Primary School and Sacred Heart Primary School. We can do this in all our large buildings (schools, new care homes, leisure facilities, public buildings) in Ilkley.

Picture from grant associates SuDS Manual¹

Flush with Care

Don't flush anything other than the 3 P's (pee poo and paper) down the loo!



The only things that are okay to flush down the toilet are pee, poo and toilet paper.



Anything else wreaks havoc on our sewer system.

From MetroVancouver²

¹ <http://grant-associates.uk.com/projects/suds-manua>

² <http://www.metrovancouver.org/services/liquid-waste/preventing-problems->

Order a Water Butt

Yorkshire water provide them³



Monitor the Pollution in the Wharfe and Report Discharges

And help our campaign. We need volunteers to keep a good check on the situation. We need to report discharges, check they are legal and take our own samples of the water in the river. You can also sponsor a sample (its £20 each time). We have put together a regime and process for sampling which is currently being checked against EA standards.

The Campaign for Clean Water in the Wharfe are focusing on these three activities:

- (a) Pursuing Yorkshire Water and the Environment Agency by formal official routes through the Town Council and our MP to account for their action and take responsibility as custodians of our river.
- (b) Monitoring all activity when it rains and reporting pollution to the EA. Undertaking our own monitoring of water quality.
- (c) Providing stories that interest the public through the media so that the Town is aware of what's happening.

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Campaign Blog

<https://spark.adobe.com/page/7y6KPfmggkaej/>

pipes/unflushables/Pages/default.aspx

³ <https://www.savewatersavemoney.co.uk/products/garden>