

# Pollution Incident Reduction Plan (PIRP)

**Undertaker:** Severn Trent Services (Water & Sewerage Ltd. (Trading as ST Connect))


**Plan year:** 2025

**Date of publication:** 30<sup>th</sup> March 2026

**Geography:** England

## CEO approval statement

I, Neirin Roberts, Head of Severn Trent Services (Water & Sewerage Ltd. (Trading as ST Connect)), confirm that I have personally approved this Pollution Incident Reduction Plan and that it has been prepared having regard to regulator guidance and the requirements of sections 205A–205B of the Water Industry Act 1991.

Signature:  Date: 30<sup>th</sup> March 2026

This document follows the Environment Agency / Natural Resources Wales guidance (published 8 January 2026) for PIRPs and Implementation Reports. It is not to be edited after publication and retained for at least 5 years. It will be published as PDF with the CEO statement on the first page and the regulator emailed the public link to it on the company website.

## Section 1 – Pollution incident frequency, seriousness and causes (previous calendar year)

Provide a clear analysis of pollution incidents attributable to your system in the preceding calendar year. Use official incident data (Category 1–3) and separate by asset type. Summarise trends, hotspots, and performance against Ofwat PCLs.

Asset types (add/remove as applicable): Foul Sewers; Combined Sewer Overflows; Rising Mains; Wastewater Pumping Stations; Wastewater `

### 1.1 Frequency and seriousness by month and asset type

Insert one table per asset type that caused incidents last year. Example structure below (copy per asset type).

**Asset type: WwTW**

Month	Category 1	Category 2	Category 3	Subtotal
Jan	0	0	0	0
Feb	0	0	0	0
Mar	0	0	1	1
Apr	0	0	1	1
May	0	0	0	0
Jun	0	0	0	0
Jul	0	0	0	0
Aug	0	0	0	0
Sep	0	0	0	0
Oct	0	0	0	0
Nov	0	0	0	0
Dec	0	0	0	0
Total	0	0	2	2

### 1.2 Causes (serious incidents)

For each asset type that caused Category 1 or 2 incidents, list each incident with immediate and root causes.

- There were no instances of Category 1 or 2 incidents

### 1.3 Causes (Category 3 incidents – aggregated by root cause)

For each asset type with Category 3 incidents, aggregate root causes (apply a 5% threshold where large volumes justify). Percentages may exceed 100% where multiple root causes apply.

Asset type	Root cause	No. Cat 3 incidents	% of Cat 3 incidents
WwTW	March – Shock load at inlet, believed from an adjacent to site pumping station cleaning activity and poor operation of filter bed siphons and rotating scraper arm failure on one humus tank.	1	50%
	April - Shock load at inlet from undetermined source	1	50%

### 1.4 Narrative analysis and PCLs

- There has been a total of 2 reported Environment Agency Category 3 incidents in the last 12 months.
- There were 2 additional incidents which were both reported to the EA. (1) March 2025 which was classified as Category 4 (no impact) and (2) December 2025, which was discounted as a failure, due to low ambient temperatures detrimentally affecting the biological process. No category was assigned to this as the failure was discounted. Neither resulted in a serious incident.
- There were no performance targets set by Ofwat or the Environment Agency outside the requirements of the EA EPR discharge permit (WR2717).
- Site performance met expected levels other than the incidents stated above.
- Future planned measures and their implications are detailed in section 3.

1.4 Guidance - State applicable Ofwat performance commitment levels (total incidents and serious incidents, if applicable) and confirm whether performance met targets. Explain drivers, seasonal patterns, asset-type differences, and implications for planned measures.

## Section 2 – Steps taken to maintain the system (preceding year)

List measures delivered or progressed last year by asset type, including pre-existing measures that materially contribute to reducing incidents. Quantify scale and impact (incidents prevented), and map to root causes and DWMP issues.

Asset type	Measure name (use standard where possible)	Actions (what was done)	Scale (how many / where)	Impact in year (Cat 1-3 incidents prevented)	Root causes addressed	DWMP issue addressed (if relevant)	Delivery status (pre-existing / delivered / in progress)	Comments
WwTW	Filter bed siphons	Replacement of old siphons	4	Cat 1 – 0 Cat 2 – 0 Cat 3 – 2	Poor performance (old assets) preventing correct operation of rotating filter bed distributor arms	n/a	Complete	Failing hydraulic siphons now replaced with lightweight units for ease of maintenance

## 2.1 Narrative evaluation

- The 4 'old' siphons were replaced in 2025 due to poor operation and increasing intervention requirements. This was preventing the correct flows to the distribution arms and their corresponding filter beds. The remaining 2 siphons requiring replacement were completed in Jan 2026 and will be reported in the 2027 PIRP.

## Section 3 – Planned additional measures (next calendar year)

Detail all measures planned for the next calendar year across relevant asset types, including ongoing measures from previous PIRPs. Include scale, expected impact, start and completion dates, and linkage to root causes and DWMP issues. Confirm whether these measures will meet applicable Ofwat PCLs.

Asset type	Measure name (standard or bespoke)	Actions (what will be done)	Scale in next year (how many / where)	Expected impact next year (Cat 1-3 incidents prevented or rated effectiveness)	Root causes addressed	DWMP issue addressed (if relevant)	Start date (mon/yr)	Completion date (mon/yr)	Comments
WwTW	Inlet screen	Replacement	1	Cat 1 – 0 Cat 2 – 0 Cat 3 – 1	Replacement of worn asset	n/a	July 26	Aug 26	Existing failing screen is long beyond serviceable life.
WwTW	Humus tanks	Enable auto-recirculation	2	Cat 1 – 0 Cat 2 – 0 Cat 3 – 2	Inefficient manual operation	n/a	Apr 26	June 26	This is a process improvement to stabilise and improve process performance.
WwTW	PSTs	Auto de-sludging	2	Cat 1 – 0	Manual de-sludging not	n/a	Feb 26	Apr 26	An improvement to

				Cat 2 - 0	always able to be carried out at optimum time				help in operational consistency and free up operational man hours.
				Cat 3 - 2					
WwTW	Storm tanks	Assessment of potential additional capacity	1	Cat 1 - 0	Increased capacity may reduce number & duration of storm discharge	n/a	Aug 26	Mar 27	Quantification of additional storage requirement to reduce storm discharges.
				Cat 2 - 0					
				Cat 3 - 0					
Gravity foul and surface water sewers	Proactive sewer cleaning	A proactive, planned cleaning program will be carried out across our gravity sewer network. This includes mechanical cleaning, jetting, and removal of	1	Cat 1 - 0 Cat 2 - 0 Cat 3 - 2-3	Build-up of silt, debris and FOG, Restricted capacity leading to blockages & Asset deterioration caused by prolonged surcharge conditions	Duty to maintain public sewers. Reducing risk of blockages and flooding in known high-risk catchment areas.	04/2026	05/2026	A proactive cleaning approach ensures that sewers remain free-flowing and less prone to blockage-related incidents. Regular removal of silt and debris also reduces the likelihood of sewer flooding during periods

accumulated  
silt, fats, oils,  
grease  
(FOG), rags,  
and other  
debris.

of high rainfall  
and contributes  
significantly to  
maintaining  
network health.  
This measure is  
preventative  
and closely  
aligned with  
reducing  
pollution  
incidents and  
improving asset  
performance.

WwTW	Filter bed distribution arms	Replacement of 4 filter bed arms and centre column assemblies	4	Cat 1 – 0 Cat 2 – 0 Cat 3 – 2	Poor performance (old assets) preventing correct operation of rotating filter bed distributor arms	Oct 26	Mar 27	Order placed design and construction underway, expect delivery early into third quarter
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WwTW	Filter bed siphons	Replacement of old siphons	2	Cat 1 – 0 Cat 2 – 0 Cat 3 – 2	Poor performance (old assets) preventing correct operation of rotating filter bed distributor arms	Jan 26	Complete	Failing hydraulic siphons now replaced with lightweight units for ease of maintenance
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### 3.1 Narrative – effectiveness and PCL assurance

- The Inlet Screen is past its designed operational duty life expectancy and is requiring increasing intervention to keep operational. Although later stages of the treatment process will remove oversized materials, the failure of the screen would impact on the effectiveness and reliability of downstream equipment, risking permit compliance and pollution events. As such, this is a key preventative measure.
- Auto re-circulation of liquor from the Humus Tanks will enable better control of site performance by keeping the filter media uniformly wet and oxygenated, preventing dry spots and supporting a healthy, aerobic biofilm. Recirculation increases contact time between wastewater and the biofilm and helps seed lower layers of media. It will also keep a good proportional ratio through the diurnal and weather cycles and reduce the requirement of Operator intervention. This will reduce the likelihood of permit non-compliance.
- Auto de-sludging of the PSTs will enable better control of site performance, reduce the likelihood of septicity issues within the process and reduce the requirement of Operator intervention. This will reduce the likelihood of permit non-compliance.
- An assessment of Storm tank capacity will indicate what size would be required for a meaningful reduction in discharge duration and frequency.
- A proactive cleaning approach for gravity sewers ensures that they remain free-flowing and less prone to blockage-related incidents. Regular removal of silt and debris also reduces the likelihood of sewer flooding during periods of high rainfall and contributes significantly to maintaining network health. This measure is preventative and closely aligned with reducing pollution incidents and improving asset performance.
- The replacement program for the inefficient and failing siphons was completed in Jan2026. All have now been replaced.

- Four filter bed distribution arm and centre column assemblies are to be replaced due to poor operation and increasing intervention requirements. The other 6 beds had theirs replaced two years previously.

### Implementation Report (to be published with PIRP from 1 April 2027)

Assess delivery of measures planned for the preceding calendar year (including ongoing measures). Use the categories: full / expanded / partial / none, and positions: implemented on time / implemented late / on track / removed. Explain reasons and how you will avoid repeating failures when delivering the same or similar measures this year.

Asset type	Measure name	Actions (planned)	Planned scale	Planned start (mon/yr)	Planned completion (mon/yr)	Extent delivered (full/expanded/partial/none)	Position (on time/late/on track/removed)	Reason (if not full & on time/on track)	Avoid repeat failure (this year's approach)
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### Publication and compliance checklist

- CEO statement of personal approval included at the start.
- Covers Sections 205A(4)(a)–(g): frequency, seriousness, causes, steps taken, planned measures, expected impact, timing, and any Ministerial directions.
- Uses official incident data (CICS categories) for the preceding calendar year.
- Separate content by asset type; across-asset measures only where appropriate.
- Tables populated with scale and quantified/rated impacts.

- Ofwat PCLs stated; assurance on whether measures meet PCLs.
- DWMP linkages explained (for sewerage undertakers).
- Published on company website as PDF; accessible from homepage; indexable; not altered after publication; retained  $\geq 5$  years.
- Regulator notified by email with public links on or before 1 April.