01 September 2025

Mark Roberts
Chief Executive
Environmental Standards Scotland
Thistle House
91 Haymarket Terrace
Edinburgh
EH12 5HD

SCOTTISH WATER
The Bridge
6 Buchanan Gate
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Customer Helpline
T: 0800 0778778
W: www.scottishwater.co.uk

Dear Mark

Storm Overflows – An Assessment of Spills

I am pleased to provide an update on progress against the recommendations for Scottish Water within the *Storm Overflows – An Assessment of Spills* report.

Recommendation 1

We are on track to install 700 additional event duration monitors (EDMs) before the end of 2025 and to integrate these into our near-real time overflow map before the start of the 2026 bathing water season in June 2026.

We have to date a total of 1,747 EDMs installed, with 1,278 EDMs currently represented on the overflow map. The remaining will be added to the overflow map following a period of data validation that we undertake post installation.

We have added information on environmental pollution incidents (EPIs) to our website (Sewage Pollution - Scottish Water) under our sewage pollution page and published information on EPI by asset type (2024-25 EPI by asset type). This includes a list of twenty locations where EPIs occurred at storm overflows between April 2024 and March 2025. We will update this information when our annual report is published each year.

Recommendation 2

We are installing EDMs at locations with unsatisfactory intermittent discharges (UIDs). Since May, installations have increased from 474 to 533 locations; 468 are currently visible on our overflow map. The remaining sites will be added within three months, and all UID locations are expected on the map by April 2027.

We committed to provide you with more details on the advancement and development of Wastewater Intelligent Networks (WWIN), we have:

- Deployed over 500 Sewer Level Monitors that allow us to detect abnormal water levels and identify operational issues in the sewer network. We plan to have 1000 Sewer Level Monitors in place by Summer 2026.

- Made an Application Programming Interface (API) available to external parties in advance of the Bathing season, allowing access to our sewer overflow data.

- Enhanced our capabilities within WWIN to understand better our asset performance especially during storm events which will support our operational and investment decision making.

- Progressing several 'proof of concepts' to assist in development of our WWIN routemap:

    - smart cameras to detect flooding
    - enhanced artificial intelligence blockage detection to support our operational response
    - hydraulic model integration to assess correlation between modelled prediction and observed EDM data.

A summary of the WWIN activities is shown below (Appendix 1) and we will be publishing a routemap by the end of 2025.

Recommendation 5

We have developed a draft *Dry Day Overflow Event* definition and have shared this with SEPA, the definition is aligned with England and Wales (Appendix 2). We await SEPA's feedback before finalising and publishing the definition on our website.

Recommendation 6

By December 2027, we are projecting that we will deliver 114 UID outputs, made up of 71 of the original 108 high priority UIDs and 43 alternate high and medium priority UID needs. This includes several 'no builds' identified during our investigation of the UIDs. A list of UID outputs scheduled before December 2027 will be published on the Scottish Water website by 30 September. Our Draft SR27 Business Plan outlines future improvements to UIDs, and we expect water sector stakeholder feedback in September. This input will shape our Final Business Plan, which will be submitted by February 2026.

We will plan to provide a further update to ESS on all the above recommendations by no later than 01 March 2026.

If you have further questions or feedback on this update, please don't hesitate to get in touch.

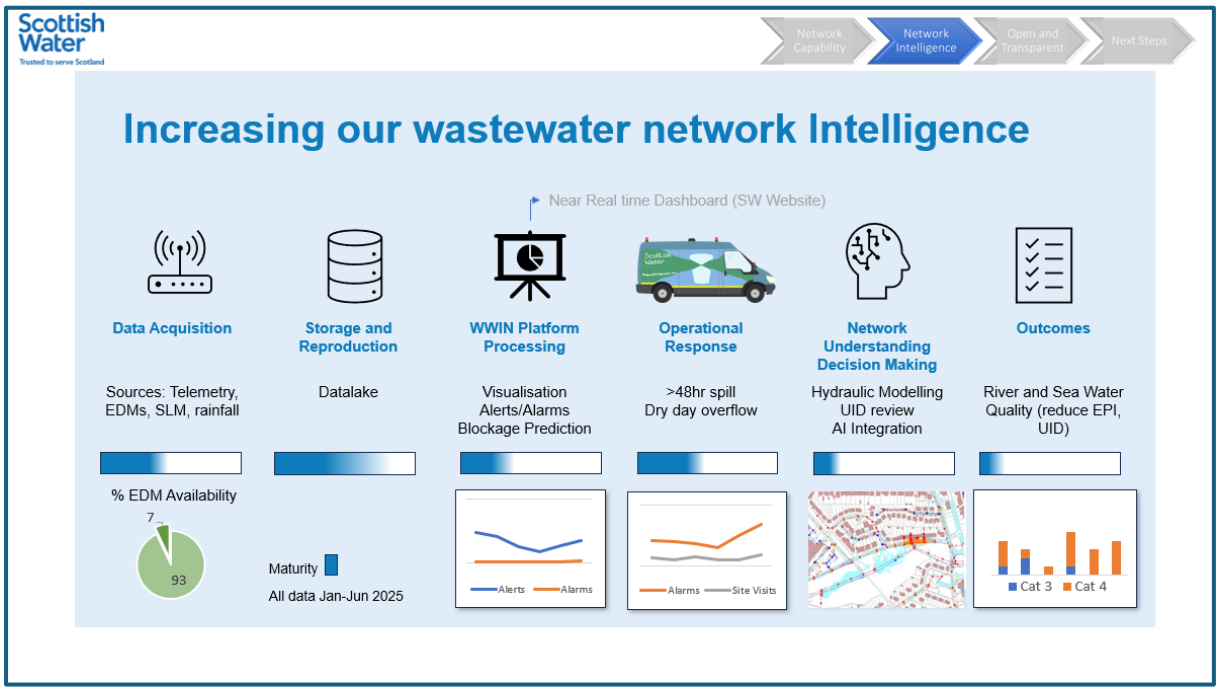
Yours sincerely

[redacted]

Simon Parsons
Director of Environment, Planning and Assurance

Appendix 1 – Wastewater Intelligent Network (WWIN) Development

Through the deployment of network monitoring technologies including an installation programme of in-sewer level monitors, the wastewater intelligent networks platform (WWIN) will increase our visibility and understanding of how our networks are performing, which will allow us to act before we see the impact in the environment through CSO monitoring. Coupled with data analysis and proactive network interventions through our Intelligent Control Centre and field teams, WWIN will support a reduction in Environmental Pollution Incidents and Flooding due to operational issues.



Our wastewater network intelligence is growing through improved data acquisition, storage, processing, and operational response. Telemetry, EDMs, SLMs, and rainfall data feeds into our datalake, enabling performance dashboards, alerts, and predictive analytics to be performed, supporting various teams.

The image above provides a high-level visualisation of the journey for the EDM and SLM data taking the base data from our monitors, combining this with other information and transitioning to intelligence.

WWIN Routemap (Key Deliverables)

- EDM Overflows Portal Release 2 is scheduled for October 2025.
- The WWIN Routemap is planned for publication in December 2025.
- WWIN coverage will extend from the original 4 pilot catchments to 16 catchments by March 2026.

- 1000 SLMs to be deployed within the network by April 2026.
- Publication of overflow event data will be expanded in March 2026.
- Our blockage detection and enhanced catchment performance analysis pilot is planned for May 2026.
- The Near Real Time Overflow Portal will include 2000 EDMs by June 2026.

Appendix 2 - Dry Day Overflow Event Definition

Our proposal is to adopt the English and Welsh definition of a dry day spill: as set out below.

English and Welsh Definition

In England (Environment Agency) and Wales (Natural Resources Wales) a dry day spill is defined as: "***A dry day spill is when a storm overflow is used on a 'dry day' – which is defined as no rainfall above 0.25mm on that day and the preceding 24 hours***".

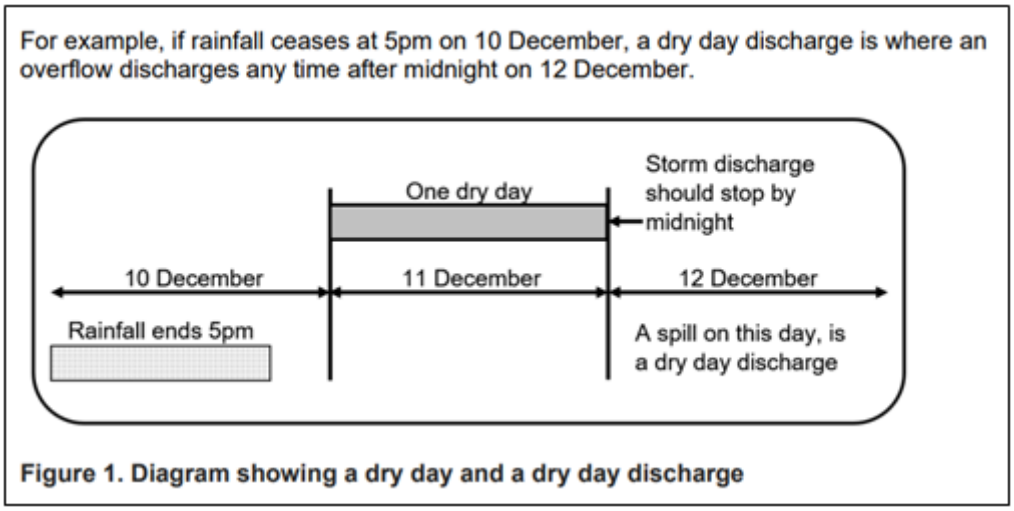


Figure 1: Extract from GN066 - How to classify storm overflow performance, Natural Resources Wales

A discussion document, setting out this proposal and some of the risks, issues and approaches to mitigating these has been shared with SEPA. The main risks identified are around the reliability of rain gauge information and the nature of how some catchments work, particularly those with very long drain down times.