Mark Roberts
Chief Executive
Environmental Standards Scotland
Ìrean Àrainneachdail na h-Alba



Simon Parsons Director of Environment, Planning and Assurance Scottish Water By email

05 November 2025

Dear Simon,

Storm Overflows – an assessment of spills, their impact on the water environment and the effectiveness of legislation and policy

Thank you for your letter of 1 September 2025 providing an update on action being taken by Scottish Water in response to the recommendations in our report on storm overflows. I welcome your ongoing engagement with ESS and your work with SEPA to address the recommendations.

I was grateful for your update on the action being taken, in conjunction with SEPA, in response to Recommendations 1 and 2, to install additional event duration monitors and make more information on wastewater spills, compliance with licences and environmental pollution incidents available to the public. Your ongoing commitment to making more up to date information available through the overflow map on your website, the publication of information on Environmental Pollution Incidents by asset type and the ongoing development of your Wastewater Intelligence Networks are welcome.

I was particularly pleased to hear about your work with SEPA, in response to recommendation 5 in our report, to develop analytical tools to identify instances where overflows may be spilling in dry weather. This is an important development

and will help to identify those instances where spills are likely to have a more significant impact on the environment and to inform follow-up work to verify performance and prioritise unsatisfactory overflows for improvement.

I note that, in response to recommendation 6 in our report, publication of the list of assets which are scheduled for investment and improvement by December 2027 was delayed beyond the end of September 2025, but that you expect to make this available shortly. As our report noted, it is important that clarity is provided to the public on when improvements to high priority assets can be expected and so I would be grateful if you could update us when this information is published. I also welcome further information being published on investment priorities as part of your final SR27 Business Plan.

I look forward to receiving further updates from you and SEPA in March 2026 on progress with implementation of the dry weather analytical tool and action to address the other recommendations in our report.

Yours sincerely,



Mark Roberts
Chief Executive