



ESP WATER

Pollution Incident Reduction Plan



April 2026



Board Assurance

In conjunction with the requirements of Section 205A-B of the Water Industry Act 1991 and Water (Special Measures) Act 2025 our Pollution Incident Reduction Plan (PIRP) has been compiled with ESP Water's Board and following internal presentations on the detail of this plan it has received full approval.

Signed:

A handwritten signature in black ink that reads "Kevin O'Connor". The signature is written in a cursive, flowing style.

Kevin O'Connor
Chief Executive, ESP Utilities Group

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1.0 Introduction

Pollution incidents lead to the release of harmful substances into air, land, or water, and some can cause significant harm to the environment.

The government has introduced a new statutory requirement for water companies to publish annual plans, called Pollution Incident Reduction Plans (PIRPs), to increase transparency about the steps required to address performance issues, reduce pollution incidents and their impact on the environment.

This is ESP Water's (ESP) first published PIRP and it describes our approach to preventing pollution incidents over the coming year, as part of a longer-term approach to protecting the environment.

2.0 Welcome to ESP Water

We are an independent water and sewerage undertaker also known as a NAV (New Appointment and Variation company) supplying water and wastewater services to new residential and commercial developments throughout England and Wales.

ESP Water was founded in 2021 and is part of the ESP Utilities Group (ESPUG), which has been providing gas and electricity to properties for over 20 years as an asset adoption company. ESPUG have over one million utility connections on residential, industrial and commercial networks across the UK.

We were granted our first NAV appointment on 24 July 2022 for a site in Salford, Manchester called Merchant's Wharf. At the time of publication, variations to this appointment have been granted for a further 146 sites throughout England. More information on ESP can be found on our website at www.esug.com.

In 2027 we will be required to submit an Implementation report alongside this PIRP, which details how successful our PIRP was in preventing pollution events.

As a NAV company we are not yet required to publish a Drainage Wastewater Management Plan (DWMP). However, when we do publish our DWMP this will be linked to our PIRP.

3.0 What is a pollution incident?

If any polluting matter escapes from any of our assets and encounters surface waters or a watercourse, this is classed as a pollution incident. When we talk about 'assets' we mean any part of our water and wastewater network.

Pollution incidents are categorised by the Environment Agency (EA) to form their Environmental Performance Assessment (EPA). Pollution incidents are identified as Category 1, 2 or 3, according to the impact they have on the environment, with category 1 being the most serious. Category 4 is no impact and is not relevant to PIRPs.

- Category 1 – major, serious, persistent and/or extensive impact or effect on the environment, people and/or property.
- Category 2 – significant impact or effect on the environment, people and/or property.
- Category 3 – minor or minimal impact or effect on the environment, people and/or property.

4.0 Our Performance

ESP Water, as a NAV company, has been a statutory water and wastewater undertaker since 2021. Our performance to date has resulted in zero pollution incidents.

Table 1: Performance summary by category 2021 to 2025

Pollution Category	2021	2022	2023	2024	2025
Category 1: Major damage to environment, people, and/or property	0	0	0	0	0
Category 2: Significant damage to environment, people and/or property	0	0	0	0	0
Category 3: Minor damage to environment, people and/or property	0	0	0	0	0

5.0 Mitigation of Potential Pollution Incidents

ESP has zero pollution incidents from our asset base. This PIRP will detail how we maintain zero pollution incidents. The plan will detail our measures and action we propose to undertake per asset type for the next 12 months to maintain zero pollution incidents.

Our current asset base is limited to Foul Sewers, Surface Water Sewers and Associated Outfalls, and Water Distribution Networks. However, we expect to adopt further assets as adoption agreement completions throughout the next 12 months. Therefore, we will provide details relevant to existing assets and future assets.

5.1 Existing Assets

This section details the measures and actions we undertake to prevent pollution incidents.

Table 2 details the actions undertaken across our asset base. ESP acquires new assets via water and sewer adoption agreements from residential and commercial developers.

The first step in preventing and reducing flooding incidents is to have well designed and constructed networks. We engage with our developer customers and their designers using the specifications within the Codes for Adoption, to have well designed networks and require consideration of potential pollution routes that could have a detrimental effect to any water body and investigate potential mitigation. We also inspect the prospectively adoptable networks during construction to ensure correct construction further reduces the potential of pollution incidents.

Adoption of ESP wastewater assets is not immediate, and prior to the adoption the wastewater networks are still privately owned by the developer. The network remains private until the completion of the adoption agreement at which point the network is vested into the ESP public sewer network. If the private networks cause a pollution incident, and we are informed, we will immediately contact the developer for them to act. As part of the adoption agreement developer emergency contacts are provided which would be used in a pollution incident. We will provide support and guidance to developers to resolve any pollution event and if appropriate ensure the EA are aware of the incident. On completion of the adoption agreement(s), as per Codes for Adoption criteria, the water and wastewater assets become ESP public assets and the measures detailed below are used to prevent pollution incidents.

Table 2: Measures undertaken and planned to maintain across whole Asset Base in 2026/27

Measure	Description of action	Scale of action	Expected Impact of the measure	Implementation completion date of measure
Design	Continue to verify designs ahead of asset adoption. Requirement to consider sewer capacity exceedance and include mitigation within the design	All water and sewer designs submitted and approved	Maintain Zero pollution incidents	Ongoing
Asset Inspections	Asset inspection of all adoptable sewerage and water mains to ensure adequate construction	All adoptable assets	Maintain Zero pollution incidents	Ongoing
Third Party Notification	Sewer adoption is not an immediate process. On development sites there will be a period of time the network remains private. If a pollution incident occurs on the private network, we will notify the developer for them to undertake action to resolve the incident	All assets where required	Maintain Zero pollution incidents attributed to ESP assets	Where necessary

Tables 3, 4 and 5 details the measures and action undertaken on individual existing ESP assets.

While Tables 3 and 4 give measures undertaken for the gravity foul and surface water sewers, a correctly designed and constructed sewer require minimal maintenance. Intervention may become necessary where network abuse occurs. Network abuse may be determined as homeowners and commercial customer disposal of fats, oils, and grease (FOG), and ‘wet wipes’ into the sewer network, which has the potential to cause blockages leading to sewage escapes from the sewer network or could include damage by third parties once the assets are constructed.

Table 3: Measures undertaken and planned to maintain Foul Sewers in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Proactive cleaning and maintenance	Undertake desilting, debris removal, and cyclical jetting	Where identified	Maintain Zero pollution incidents	Where necessary
Customer Engagement	Provide guidance through targeted communication on the correct disposal behaviours (FOG)	Where identified	Maintain Zero pollution incidents	Where necessary

Table 4: Measures undertaken and planned to maintain Surface Water Sewers and Associated Outfalls in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Proactive cleaning and maintenance	Undertake desilting, debris removal, and cyclical jetting	Where identified	Maintain Zero pollution incidents	Ongoing

It is not just wastewater that can cause a pollution incident. The potable water we provide to our customers (Water Distribution Network), can escape from the network and cause a detrimental effect to watercourses. Similar to foul and surface water sewers well designed and constructed water distribution network require minimal maintenance. Table 5 details our actions while operating the network to prevent leakage and therefore a potential pollution incident.

If a leak on the Distribution Network were to occur, we would activate our Emergency Water Services Agreement. The agreement if activated would result in our service provider rapidly visiting site to mitigate/reduce any chlorinated water entering a watercourse.

The Developer is required to obtain all necessary permits and agreements for flushing, to confirm where water can be safely flushed and disposed of, and where ESP is carrying out the flushing confirm whether the water requires de-chlorination prior to release to prevent a pollution incident. This applies to all developments where flushing activities are required as part of water network commissioning.

Table 5: Measures undertaken and planned to maintain Water Distribution Networks (water mains) in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Calm Networks Operation	The water distribution network will be operated under the calm network principles. Increasing the lifespan of the infrastructure and reducing potential leakage.	All the water network	Maintain Zero pollution incidents	Ongoing
Network flushing permit	Permits and agreement are required confirming where water can be safely flushed and disposed of.	Where required	Maintain Zero pollution incidents	Ongoing

5.2 New Assets

Over the next 12 months further networks will be adopted increasing our asset base and introducing other additional asset types to the ESP public water and wastewater network. Tables 6 to 10 are the additional types of wastewater assets expected to be adopted and added to the ESP asset base. The adoption and pace of expansion of the asset base will depend on developer activities and plot occupation of individual sites.

Table 6 describes the measure and action for a rising main asset. A rising main is a pressurised sewer associated with a wastewater pumping station.

Table 6: Measures undertaken and planned to maintain Rising Mains (wastewater rising main sewers) in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Analysis of telemetry data	Use of telemetry data to identify issues and allow early intervention	On all rising mains	Maintain Zero pollution incidents	When necessary

Table 7 is wastewater network air valves and washouts assets measures and actions. Air valves are located on the 'high point(s) of rising mains and washout on the low point(s). Cyclical visits to these assets will be undertaken for necessary cleansing and maintenance where appropriate. Cyclical maintenance will be in line with our Asset Management Plan and be bespoke to the requirements of each asset type. Assets shall be maintained by our service partner, who are required to demonstrate competency in providing these services.

Table 7: Measures undertaken and planned to maintain Air Valves/Wash Outs (wastewater rising mains) in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Proactive cleaning and maintenance	Cyclical inspections. Undertake cleaning and maintenance where required	On all valves and wash outs	Maintain Zero pollution incidents	When necessary

Table 8 describes the action for wastewater pumping station assets. The pumping station asset is intrinsically linked to rising mains and associated air valves and wash outs. The asset will have a telemetry link which will enable immediate remote intervention where necessary, for example reset the pumps. An enhanced level of cyclical inspection will be undertaken for maintenance and cleaning. The telemetry link will enable data analysis to highlight trends and any issues to enable early intervention where required. Cyclical maintenance will be in line with our Asset Management Plan and be bespoke to the requirements of each asset type. Assets shall be maintained by our service partner.

Table 8: Measures undertaken and planned to maintain Wastewater Pumping Stations in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Proactive cleaning and maintenance	Cyclical inspections. Undertake cleaning and maintenance where required	On all pumping stations	Maintain Zero pollution incidents	When necessary
Analysis of telemetry data	Use of telemetry data to identify issues and allow early intervention	On all pumping stations	Maintain Zero pollution incidents	When necessary

Storm Tanks/Surface Water Attenuation basins are present on most adoptable sewer networks, Table 9 details the actions and measures. Storm Tanks are used in conjunction with restricted discharge and to store rainwater with a controlled discharge from the site as not to overload the downstream watercourse/sewer. Cyclical maintenance will be in line with our Asset Management Plan and be bespoke to the requirements of each asset type. Assets shall be maintained by our service partner.

Table 9: Measures undertaken and planned to maintain Storm Tanks/Surface Water Attenuation in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Proactive cleaning and maintenance	Cyclical inspections on tanks/attenuation and flow control chamber assets. Undertake cleaning and maintenance where required	On all tanks and attenuation basins	Maintain Zero pollution incidents	When necessary

Table 10 details the measures and actions for Sustainable Drainage Systems (SuDS). SuDS are another example of surface water attenuation, however in this context we refer to 'Green SuDS' i.e. Basins, Ponds and Swales. Cyclical inspections are undertaken to cleanse and maintain the asset. Generally, this involves grass cutting litter picking and removal of sedimentation where required. Furthermore, cyclical maintenance will be in line with our Asset Management Plan and be bespoke to the requirements of each asset type. Assets shall be maintained by our service partner.

Table 10: Measures undertaken and planned to maintain Sustainable Drainage Systems (SuDS) in 2026/27

Measure	Description of action	Scale of action	Expected impact of the measure	Implementation completion date of measure
Proactive cleaning and maintenance	Cyclical inspections on SuDS assets (basins, ponds, and swales). Undertake cleaning and maintenance where required	On all SuDS assets	Maintain Zero pollution incidents	When necessary

6.0 Summary

ESP is dedicated to protecting the environment whilst providing water and wastewater services to our customers. Our PIRP demonstrates commitment to protecting the environment with a well-managed and maintained asset base. The measures and actions detailed in the Plan will be continually monitored against our performance and intervention undertaken where necessary to achieve zero pollution incidents for 2026/27.

HOW TO CONTACT US



YOU CAN WRITE TO US AT:

ESP Water
First Floor, Kings Court
41-51 Kingston Road
Leatherhead, Surrey
KT22 7SL



YOU CAN CALL US ON:

0333 000 0059

Our office hours for billing and account queries are:

Monday - Friday 09:00 – 17:00
excluding bank holidays



YOU CAN EMAIL US AT:

For billing related enquiries:
billing@espwater.co.uk

For all other enquiries:
hello@espug.com



YOU CAN VISIT OUR WEBSITE AT:

www.espug.com



EMERGENCIES CONTACT:

For any emergencies with your water or wastewater supplies please call our 24-hour emergency number on **0330 123 4201**