



Pollution Incident Reduction Plan

March 2026



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Section 0. Introduction

0.1. Statement of Approval

I approve and commend this 2026 Pollution Incident Reduction Plan. My team and I are confident that it will enable us to continue to protect the environment and the communities we serve. We expect our customers and communities will hold us accountable for delivering on this Plan.

Iain Amis, Managing Director, March 2026

0.2. This Pollution Incident Reduction Plan

This is Leaf Water's first Pollution Incident Reduction Plan (PIRP) since appointment as a water and sewerage undertaker in April 2024. It considers sites for which we have an appointment or variations to that appointment up to 31st December 2025, all of which are in England only. This is our Final PIRP 2026. We will update our PIRP annually, in line with regulatory requirements.

We will publish our PIRP and Approval Statement on our website and notify the Environment Agency by e-mail to confirm these have been published.

As we do not have assets in Wales our PIRP pertains only to sites in England.

0.3. Who We Are

Leaf Water (the trade name of Advanced Water Infrastructure Networks Ltd (AWIN)) is a New Appointment and Variation company (NAV) that provides water and/or sewerage services under a licence granted by the Secretary of State for the Department of Environment, Food and Rural Affairs (Defra). As with all NAV companies, AWIN is regulated by the Office of Water Services (Ofwat) through powers delegated to them in 2007. Ofwat ensures that customers are treated fairly and provides protection when the water supply does not meet the agreed standards of service.

Our first appointment was granted on 16 April 2024. By the end of 2025 one hundred NAV Areas had been granted to AWIN. We continue to expand our licence with a number of licence applications in flight and new areas being identified on a regular basis.

We do not own or operate water sources. All our water supplies are through bulk connections from the local incumbent water company. Similarly, we do not own or operate sewage treatment works. All our foul discharges are to the local incumbent Water and Sewerage Company (WASC). Surface water is usually managed within the NAV area, although there are some exceptions where discharges to the local incumbent are required.

As we grow as a business and become water and sewerage undertakers for more NAV Areas, we will consider any additional assets at each annual review of the PIRP and Implementation Report.

This PIRP has been written in accordance with the EA Guidance: Pollution Incident Reduction Plans (PIRPs) and Implementation Reports: How to prepare and publish.

Section 1. Pollution incident frequency, seriousness and their causes

The official national record of pollution incidents shows that AWIN has not caused any pollution incidents in 2025. Therefore, no further information is required in this section.

Section 2. The steps taken to maintain the system

The official national record of pollution incidents shows that AWIN has not caused any pollution incidents in 2025. In accordance with good practice, we have set out the steps we took to achieve this. While we expect to continue to have almost no pollution incidents, the main reason this was achieved in 2025 was the limited number of assets adopted by AWIN.

At the end of 2025, no wastewater assets had been adopted by AWIN. This is likely to be different in 12 months time and we anticipate having wastewater assets in the following classes:

- Foul Sewers
- Rising Mains
- Wastewater Pumping Stations
- Surface Water Sewers and associated outfalls

At the end of 2025, a number of assets had been vested by AWIN in the following asset class:

- Water Distribution Network

All our water distribution assets are new and performing as designed and there have been no pollution incidents in 2025.

All our foul sewers are inspected during construction.

Section 3. Planned Additional Measures

The official national record of pollution incidents shows that AWIN has not caused any pollution incidents in 2025. While we expect to continue to have almost no pollution incidents, we have set out the measures we intend to take to keep pollution incident numbers low.

3.1. Asset Types and Measures

2026 will see us continue to vest Water Distribution Networks and may also see the commencement of adoption of:

- Foul Sewers
- Rising Mains
- Wastewater Pumping Stations
- Surface Water Sewers and associated outfalls

All our water distribution assets are new and performing as designed.

We will continue to inspect and monitor our foul sewers and wastewater assets prior to adoption.

3.2. Planned Additional Measures to maintain Foul Sewers in 2026

Additional measures	Description of actions	Scale of actions in the next calendar year	Expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
Monitoring of construction	Inspection of all manholes and witnessing of foul sewer air tests.	Programme covering all foul sewers in construction, likely to be in excess of 150 new networks per year.	Fully mitigated, no incidents expected.	Poor construction	No identified pollution incidents.	Ongoing (01Jan26)	Ongoing (31Dec26)
Monitoring of pre-adoption maintenance period	Monitoring customer contact. Identification of construction issues for remedy prior to adoption.	Programme covering all sewer networks post construction and pre-adoption	No category 1 or 2 incidents expected. Limited risk of category 3 incidents. Likely outcome: no incidents will occur in the year.	Unidentified construction issues	No identified pollution incidents.	Ongoing (01Jan26)	Ongoing (31Dec26)
CCTV Surveys of all foul sewers prior to adoption	Review of all CCTV footage for foul sewers being adopted. Identification of construction issues for remedy prior to adoption.	Programme covering all sewer networks post construction and pre-adoption	No category 1 or 2 incidents expected. Limited risk of category 3 incidents. Likely outcome: no incidents will occur in the year.	Unidentified construction issues	No identified pollution incidents.	Ongoing (01Jan26)	Ongoing (31Dec26)

Additional measures	Description of actions	Scale of actions in the next calendar year	Expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
Remedy of all snagging prior to adoption	Track all construction issues to resolution prior to adoption	Programme covering all sewer networks post construction and pre-adoption	<p>No category 1 or 2 incidents expected.</p> <p>Limited risk of category 3 incidents.</p> <p>Likely outcome: no incidents will occur in the year.</p>	Identified construction issues	No identified pollution incidents.	Ongoing (01Jan26)	Ongoing (31Dec26)
Monitoring of networks issues post adoption	Monitoring customer contact. Identification of construction issues.	Programme covering all sewer networks post adoption including targeted inspections during site visits	<p>No category 1 or 2 incidents expected.</p> <p>Limited risk of category 3 incidents.</p> <p>Likely outcome: no incidents will occur in the year.</p>	Unidentified construction issues	No identified pollution incidents.	Ongoing (01Jan26)	Ongoing (31Dec26)
Implementation of proactive cleaning and maintenance	Implement routine jetting and cleaning of foul water sewers to remove silt, debris, and early blockages before they escalate	<p>Only in response to issues identified through the monitoring of network issues.</p> <p>Expected scale: Nil</p>	<p>No category 1 or 2 incidents expected.</p> <p>Low possibility of a few category 3 incidents</p>	Unidentified construction issues	No identified pollution incidents	As required	31Dec26

Additional measures	Description of actions	Scale of actions in the next calendar year	Expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
			Likely outcome: no incidents will occur in the year				
Implementation of proactive cleaning and maintenance	Repairs to sewers requiring regular jetting and cleaning	Only in response to issues identified through the monitoring of network issues. Expected scale: Nil	No category 1 or 2 incidents expected. Low possibility of a few category 3 incidents Likely outcome: no incidents will occur in the year	Identified construction issues	No identified pollution incidents	As required	31Dec26

3.3. Planned additional measures for Wastewater Pumping Stations in 2026

Additional measures	Description of actions	Scale of actions in the next calendar year	Expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
Power Resilience Improvements	Predictive tools for trigger levels to initiate pump out of wet well following loss of power	All new wastewater pumping stations to have remote level monitoring	Fully mitigated, no incidents expected	Power outages	No identified pollution incidents	1 st wastewater pumping stations anticipated to be adopted late 2026	Ongoing
Enhanced proactive wet well cleaning	Remote monitoring of wet well pumps with predictive analytics used to identify issues and blockages	No enhanced proactive wet well cleaning anticipated	Fully mitigated, no incidents expected	Customer behaviours	No identified pollution incidents	1 st wastewater pumping stations anticipated to be adopted late 2026	Ongoing
Enhanced proactive wet well cleaning	Repairs to pumping stations with identified ongoing issues	No repairs anticipated	No category 1 or 2 incidents expected. Low possibility of a few category 3 incidents Likely outcome: no incidents will occur in the year	Construction issues	No identified pollution incidents	1 st wastewater pumping stations anticipated to be adopted late 2026	Ongoing
Customer engagement	Provide guidance through targeted communication on proper disposal behaviours	Targeted digital communications based on	No category 1 or 2 incidents expected.	Customer behaviours	No identified pollution incidents	As required	31Dec26

Additional measures	Description of actions	Scale of actions in the next calendar year	Expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
	(such as avoiding fats, oils, wipes)	monitoring of wet well analytics	<p>Low possibility of a few category 3 incidents</p> <p>Likely outcome: no incidents will occur in the year</p>				

3.4. Planned additional measures for Rising Mains and Water Distribution Networks in 2026

Additional measures	Description of actions	Scale of actions in the next calendar year	Expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
Pressure calming	Deployment of pressure monitors to manage assets	Minimal deployment anticipated	Fully mitigated, no incidents expected	Supplying Water Company network issues	No identified pollution incidents	Ongoing	Ongoing
Smart valve installation	In response to ongoing pressure calming activities, consider installing a smart valve	Minimal deployment anticipated	Zero	Supplying Water Company network issues	No identified pollution incidents	Ongoing	Ongoing

3.5. Planned additional measures across the whole asset base in 2026

Additional measures	Description of actions	Scale of actions in the next calendar year	Expected impact of the measure in the next calendar year (Category 1 to 3 incidents prevented)	Root causes addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
Improve root cause analysis	Determine root causes for all pollution events	Minimal pollution events anticipated	Zero	Poor root cause analysis	No identified pollution incidents	Ongoing	Ongoing
Staff training	Identifying training needs and delivery training to raise awareness of pollution risks	Annual assessment of training needs	Zero	Inexperience	No identified pollution incidents	01Apr26	31Dec26

Section 4. Appendix 1 – Compliance with Section 205A (4) and 205B of the Act

4.1. Compliance Matrix

This compliance matrix confirms which matters to be addressed in a PIRP are within this document or are not applicable to us as a NAV.

Matter – 205(A) a-g	Section or not applicable?
a) the frequency with which pollution incidents have occurred during the preceding calendar year;	This is set out in Error! Reference source not found. 1.
b) the seriousness of those incidents and their causes;	This is not applicable as there were no incidents.
c) the steps the undertaker has taken to maintain any structure or apparatus comprised in its system which has been the cause of any such incidents	This is not applicable as there were no incidents.
d) the measures the undertaker intends to take or continue for the purpose of reducing the occurrence of pollution incidents:	This is set out in Section 3
(e) the impact that the undertaker considers the measures will have in furthering that purpose;	This is set out in Section 3

Matter – 205(A) a-g	Section or not applicable?
(f) the likely sequence and timing for implementing those measures;	This is set out in Section 3
(g) any other matters specified by the Minister in directions	This is set out in Sections 1, 2 & 3
Matter – 205(B) a & b	Section or not applicable?
(a) the extent to which the previous PIRP succeeded in implementing the planned measures during the preceding calendar year;	This is not applicable as this is the first PIRP
(b) to the extent that the previous PIRP failed to implement those measures during that year: (i) the reasons for that failure (ii) how the undertaker intends to avoid repeating that failure in respect of any measures in its current plan that are the same as, or similar to, those in respect of which the failure occurred;	This is not applicable as this is the first PIRP

Table 4.1: Compliance Matrix

Section 5. Version Control

5.1. Version Control

Version	Date	Author	Reason for new version	Sections affected
0.1	03Mar26	Craig Southway	First draft	All
0.2	20Mar26	Simon Taylor	Peer Review	All
1.0	23Mar26	Craig Southway	Final Plan 2026	No changes

Approval – Signed



Iain Amis

Managing Director