

Pollution Incident Reduction Plan

April 2026

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Introduction

mua Water was incorporated in April 2023 and appointed under the Water Industry Act by Ofwat as a licenced water and sewage undertaker in June 2023. We provide drinking water and wastewater services to new housing developments together with managing sustainable urban drainage solutions.

We all want a better environment, with cleaner rivers, seas, estuaries, and groundwater. Water companies play a vital role in achieving this by taking responsibility for preventing pollution escaping from their sewerage systems into the environment, including within the home.

This document, available on [our website](#), is our wastewater Pollution Incident Reduction Plan reporting on our environmental performance with respect to pollutions during 2025, and will remain accessible on our website for 5 years from the date of publication.

Pollution Incident Reduction Plans (PIRPs)

To increase transparency and drive improvements, the government introduced a new statutory requirement under the Water (Special Measures) Act 2025, amending the Water Industry Act 1991. This requires water and sewerage companies, including new appointees like MUA Water to publish annual Pollution Incident Reduction Plans (PIRPs).

PIRPs are annual plans for how we intend to prevent and reduce the occurrence of pollution incidents that are attributable to our systems, over the next calendar year, as defined by the pollution incidents in the preceding calendar year.

Plans place priority on the measures that will have the greatest impact on pollution incident numbers.

From 2027, we will also publish Implementation Reports assessing delivery of previous plans.

As a newly appointed undertaker operating since June 2024, mua Water is fully committed to these requirements.

With zero pollution incidents recorded to date, we publish this plan to demonstrate proactive prevention, robust monitoring from the outset, and ongoing dedication to environmental protection and transparency.

We welcome public feedback as we work together to safeguard our shared environment.

Chief Executive Officer Approval of Pollution Reduction Plan

As a newly appointed water and sewerage undertaker, we start with a clean record with zero pollution incidents since our appointment in 2024.

We commit to full compliance with the Water (Special Measures) Act, delivering transparent progress to customers and regulators including the Environment Agency.

Pollution prevention isn't just a duty, it's central to our culture.

I have reviewed and approve this Pollution Incident Reduction Plan.

[Add Board Signature]

[Add Director Name]

With authority of the Board of Directors

mua Water Limited

Background

Our operations relate to newly installed infrastructure which by virtue of its nature is less likely to be subject to the wear and the cumulative effects of use. Similarly, almost all our licenced areas are new housing developments that are still under construction and have yet to be fully built out, maintenance period concluded and adopted, in line with the codes of practice for vesting (transfer of ownership).

Our wastewater systems typically consist of pipes and associated infrastructure and wastewater pumping stations.

Our drinking water systems exclude booster stations (for any purpose), service reservoirs and treatment works.

We only operate within England.

As progress is made with completions, we will review our approach and respond to the growing data, records and information about the operation and performance of our networks to ensure our focus remains on preventing pollution incidents.

Pollution Incidents during 2025

Pollution incidents are eloquently defined within the Water Industry Act as discharges of any content from any structure or apparatus that comprises our systems which may be harmful to health or the quality of the environment.

Whilst pollutions are synonymous with wastewater, the inclusion of system within the definition refers to both the water treatment and supply system and sewage disposal network too (as defined in the Water Industry Act).

This important distinction recognises the pollution risk from residual chlorine concentrations within drinking water supplies as impactful upon aquatic life and environmental quality standards for rivers when supplies escape from pipes, for example.

Review of Pollution Incidents

Pollution incidents are categorised according to severity following the methodology outlined in the Common Incident Classification Scheme (CICS):

- Category 1 – major, serious, persistent or extensive impact
- Category 2 – significant impact
- Category 3 – minor or minimal impact which follow the methodology

Section 1 – Pollution incident frequency, seriousness and their causes

During 2025 our company recorded no pollution incidents of any kind; zero leaks to the environment and zero discharges to ground or into water courses. This is commensurate with our small-scale operations, our close work with our developers, together with the nature of our newly built assets that have largely yet to be adopted and fully occupied.

We will continue routine inspections and basic monitoring to keep this clean record intact as our company grows whilst planning for the additional control measures for 2026 as detailed in Section 3.

Pollution Incidents 2025

During 2025, there were no pollution incidents and provide this table of results for the record.

Severity Category	Number of Pollution Incidents		
	One	Two	Three
The seriousness categories relevant to PIRPs are:	major, serious, persistent or extensive impact	significant impact	minor or minimal impact
January	0	0	0
February	0	0	0
March	0	0	0
April	0	0	0
May	0	0	0
June	0	0	0
July	0	0	0
August	0	0	0
September	0	0	0
October	0	0	0
November	0	0	0
December	0	0	0

Table 1 – Frequency and seriousness of pollution incidents from water and sewerage networks and pumping stations during 2025

Nature of pollution incidents

Root cause analysis is essential for understanding the reasons why the pollution incident occurred, including the actions taken, or not taken, including by another party that caused the issue or allowed it to persist.

There are levels of failure to consider in whittling down the circumstances of the incident to ultimately reach a conclusion about the root cause.

We recognise that for transparency our pollution incident reduction plan will record the immediate cause together with the root cause.

Commensurate with the absence of pollution incidents in 2025 Table 2 and Table 3 are shown below for the record as otherwise blank.

Root cause of all pollution incidents

During 2025, there were no pollution incidents, and we therefore provide the following table for the record.

Event Number	Date	Time	Location	Seriousness	Root Cause
No pollution events occurred during 2025					

Table 2 - Cause of serious pollution incidents from water and sewerage networks and pumping stations during 2025

Category three pollution incidents by root cause theme

During 2025, there were no pollution incidents, and we therefore provide the following table for the record.

Root Cause	Count of Category Three Pollutions	Proportion of Category Three Incidents by Root Cause
No pollution events occurred during 2025		

Table 3 - Causes of Category 3 pollution incidents from water and sewerage networks and pumping stations during 2025

Ofwat Performance Commitment Levels

As will be reported within our Annual Performance Review (APR), our pollutions, flooding and other performance commitments are not worse than the performance commitment levels of any of the corresponding incumbent water companies - during 2025 our company recorded no pollution incidents of any kind.

Section 2 – Steps taken to maintain the system

Given the maturity of our systems, the control measures described below are commensurate with commissioning sections of systems that largely remain under development, under occupied and unvested (adopted).

Control Measures 2025

Control Measure	Description of Actions	Scale of Actions	Impact of Control Measure	Root Cause(s) Addressed by the Control Measure	Recent pollution incident performance issues identified in our DWMP	Delivery status of the measure
Drinking Water Network						
Water Distribution Network	Self-Lay Provider engagement and design reviews prior to construction phase to ensure suitable systems are constructed	All mua owned water networks	Ensures that designs are fit for purpose and have undergone relevant checks	Undetected bursts Slow response times Pressure transients Loss of supply leading to contamination risk Contamination events	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	Ongoing
Sewerage Network						
Foul Sewers	Developer engagement and design reviews prior to construction phase to ensure suitable systems are constructed	Thorough review of design plans for all sites carried out by our in-house design Engineer	Ensures that designs are fit for purpose and have undergone relevant checks	Prevents pollution incidents occurring due to poorly designed foul water systems	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	Ongoing
Manhole inspections	Manhole inspections carried out at all newly constructed manholes to verify design against proposed plan, and to check condition prior to going live	Check structural condition, debris levels and design spec of all manholes on all sites prior to going live	Ensures that constructed manholes are fit for purpose, checks debris levels and prevents flooding incidents due to poor construction	Flooding caused by high debris levels and poor construction	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	Ongoing
Customer engagement	Introductory communications including how to report incidents to owners and tenants at newly developed sites	Every customer	Ensures communication channels are communicated and understood. Pollution incidents at newly constructed developments can be reported and addressed	Prevents pollution incidents from going unreported	No Pollution Performance Issues being Addressed here – these are routine activities to ensure our customers can report pollution incidents	Ongoing
Combined Sewer Overflows	We currently do not own/operate any CSO's and control measures are not applicable here.					
Rising Mains	Not Applicable	No actions as pumping stations have not been fully operational. Full testing, commissioning and preadoption checks are underway				
Pressure calming	Not Applicable	No actions as pumping stations have not been fully operational. Full testing, commissioning and preadoption checks are underway				
Air valve maintenance	Not Applicable	No actions as pumping stations have not been fully operational. Full testing, commissioning and preadoption checks are underway				
Surface Water Sewer and Outfalls	Developer engagement and design reviews prior to construction phase to ensure suitable systems are constructed	Thorough review of design plans for all sites carried out by our in-house design Engineer	Ensures that designs are fit for purpose and have undergone relevant checks	Prevents pollution incidents occurring due to poorly designed surface water systems	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	Ongoing

Storm Tanks	Developer engagement and design reviews prior to construction phase to ensure suitable systems are constructed	Thorough review of design plans for all sites carried out by our in-house design Engineer	Ensures that designs are fit for purpose and have undergone relevant checks	Prevents pollution incidents occurring due to poorly designed systems	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	Ongoing
Wastewater Pumping Stations						
Wastewater Pumping Stations	Not Applicable	No actions as pumping stations have not been fully operational. Full testing, commissioning and preadoption checks are underway				
Wet well cleaning	Not Applicable	No actions as pumping stations have not been fully operational. Full testing, commissioning and preadoption checks are underway				
Telemetry	Not Applicable	No actions as pumping stations have not been fully operational. Full testing, commissioning and preadoption checks are underway				

Table 4 - Measures taken to maintain water and sewerage networks and pumping stations during 2025

Section 3 – Planned additional measures Control Measure Plan for 2026

For 2026, we have planned for sites coming online and vested (adopted). In this regard, the implementation dates have been written as once vested which reflects the transition between pre-adoption, maintenance and vesting as our sites transit through these stages during 2026.

We've had no pollutions to include under the heading of recent incident performance issues.

Additional Control Measures	Description of Actions	Scale of Actions	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
Drinking Water Network							
Drinking Water Network	Network monitoring and telemetry	All mua owned water networks	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	Undetected bursts Slow response times Pressure transients Loss of supply leading to contamination risk Contamination events	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Sewerage Network							
Foul Sewers	Annual documented lift & check Inspections to assess sewer condition, water levels and to check for signs of surcharge. Schedule of programmed sewer cleansing and CCTV of all foul sewers as part of the pre-adoption process	Lift and check of all foul sewer lengths in each of our developments twice yearly. Programme of planned maintenance to jet clear the foul network as a preventative measure	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	Clearance of fats, oils and greases. Prevention of accumulation of debris. Identification of blockage hot spots	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Manhole inspections	Annual documented lift & check Inspections to assess chamber condition, water levels and to check for signs of surcharge. Schedule of sewer cleansing and CCTV of all sewers & chambers as part of this year's pre-adoption process	Lift and check of all foul sewer lengths in each of our developments twice yearly. Jetting to be organised where evidence of obstruction of flow is present. Programme of planned maintenance to occur bi-yearly to	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	Clearance of fats, oils and greases. Prevention of accumulation of debris. Identification of blockage hot spots	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested

		jet clear the foul network as a preventative measure					
Customer engagement	Targeted communication to customers in the form of leaflets on proper disposal of fats, oils and greases. Misconnection literature to be distributed to advise on cross connections and correct use of foul and surface water drainage	All homes and businesses to be letter dropped and/or sent links to relevant web pages detailing relevant guidance	Expected to have a positive impact on significantly reducing Category 1 to 3 incidents	Educate customers on correct disposal methods Reduce FOG entering the sewer network Lower the risk of blockages, sewer flooding, and pollution Improve compliance with legal requirements (e.g., Section 111 Water Industry Act) Raise awareness of environmental impacts	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Combined Sewer Overflows	We currently do not own/operate any CSO's						
Rising Mains	Planned annual pumping station maintenance activities to include rising main check and site walk over. Pre-adoption hydrostatic pressure testing of rising mains programmed to be carried out this year	Testing at pumping stations	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	Identification of defective pipework Leakage due to joint failure Septicity and internal corrosion	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Pressure calming	Planned annual pumping station maintenance activities. Telemetered monitoring of pump activity	Testing and telemetry at pumping stations	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	Sudden pressure surges Air entrapment Pump control issues Reverse flow and valve slam	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Air valve maintenance	Planned annual pumping station servicing maintenance activities (or after any major surge event or pump failure) including visual inspections, operational checks, cleaning and clearing, chamber inspections	Testing at pumping stations	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	Air entrapment in rising main Pressure surges Vacuum conditions when the main sewer drains Air locking and reduced pumping efficiency Septicity and corrosion from unstable flow	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Surface Water Sewer and Outfalls	Misconnection literature to be distributed to advise on cross connections and correct use of surface water drainage Documented lift & check Inspections to assess sewer condition, look for evidence of contamination, water levels, flow control devices, and to check for signs of surcharge.	Lift and check of all sewer lengths in each of our developments twice yearly. Programme of planned maintenance to jet clear the surface water network as a preventative measure	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	Prevention of misconnected drainage systems and pollution Prevention of accumulation of silt/debris. Identification of blockage hot spots and system surcharge. Obstruction of surface water outfalls	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested

	<p>Programmed sewer cleansing and CCTV of all surface water sewers planned as part of pre-adoption process</p> <p>Visual inspection of all outfalls, to include vegetation assessment and inspection of trash screens</p>	Clear vegetation as required					
Storm Tanks	<p>Visual inspection of tank, debris levels and flow control devices</p> <p>Check for evidence of contamination</p>	Check storm tanks	As our developments are newly laid our approach is expected to prevent all category 1 to 3 incidents	<p>Prevention of misconnected drainage systems and pollution</p> <p>Prevention of accumulation of silt/debris.</p> <p>Identification of system surcharge</p> <p>Malfunctioning flow control devices</p> <p>Obstruction of surface water outfalls leading to system surcharge and flooding</p>	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Wastewater Pumping Stations							
Wastewater Pumping Stations	<p>Planned annual pumping station maintenance and servicing activities. Telemetered monitoring of pump activity and overflow activity</p>	All pumping stations to be included	As our pumping stations are newly built and well maintained our approach is expected to prevent all category 1 to 3 incidents	Mechanical failure, blockages, electrical/control faults, pressure transients, sediment build-up, unmonitored overflows, and lack of early warning	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Wet well cleaning	Annual cleaning of wet wells carried out during servicing/maintenance if required	All pumping stations to be included	As our pumping stations are newly built and well maintained our approach is expected to prevent all category 1 to 3 incidents	Debris build-up, Reduced storage capacity, Pump inefficiency, Septicity, Sensor failure Hidden structural deterioration	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested
Telemetry	<p>Real time telemetry monitoring</p> <p>Twice yearly checks and servicing</p>	All pumping stations to be included	As our pumping station telemetry is newly installed and well maintained our approach is expected to prevent all category 1 to 3 incidents	Pump failure, Blockages, Electrical faults, Unmonitored overflows, Pressure transients, Asset deterioration, Inefficient operation	No Pollution Performance Issues being Addressed here – these are routine pollution prevention controls	As supply systems mature and become vested	Ongoing once vested

Table 5 - Planned additional measures for sewerage networks and pumping stations during 2025

Chief Executive Officer Approval of Implementation Report

As a newly appointed water and sewerage undertaker, we start with a clean record with zero pollution incidents since our appointment in 2024.

We commit to full compliance with the Water (Special Measures) Act, delivering transparent progress to customers and regulators including the Environment Agency. Pollution prevention isn't just a duty, it's central to our culture.

I am aware of the need to approve our Implementation Report and that our legal obligation is to deliver our first report for April 2027.

[Add Board Signature]

[Add Director Name]

With authority of the Board of Directors

mua Water Limited

A review of the implementation of Control Measures deployed in 2025

Here we assess the extent to which we have succeeded or failed to implement measures designed to reduce the occurrence of pollution incidents during the preceding year.

For context, we have not yet reached the operational maturity required for full-scale implementation of all proposed measures, particularly advanced monitoring systems. This stems from our limited asset base and corresponding small-scale operations. We are committed to preventing pollutions and whilst our sites mature through to vesting (adoption), we are prioritising staff training and routine inspections.

We are not legally required to complete this part of the report until April 2027 where we will include an appraisal of the control measures planned for 2026 where we expect some of our wastewater assets to come into our ownership – hence the table presented below is greyed out.

Measure	Description of Actions	Scale of Actions	Planned implementation start date of the measure	Planned implementation completion date of the measure	Extent of implementation planned or achieved at the end of previous calendar year	Position of implementation at the end of previous calendar year	Explanation	How to Avoid Repeat Failure
Drinking Water Network								
Drinking Water Network								
Sewerage Network								
Foul Sewers								
Manhole inspections								
Customer engagement								
Combined Sewer Overflows								
Rising Mains								
Pressure calming								
Air valve maintenance								
Surface Water Sewer and Outfalls								
Storm Tanks								
Wastewater Pumping Stations								
Wastewater Pumping Stations								
Wet well cleaning								
Telemetry								

Table 6 - Success or failure in implementing the measures planned for water and sewerage networks and pumping stations during 2025

