



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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The countryside charity
Hertfordshire

StormOverflowsPlanConsultation@defra.gov.uk

12th May 2022

Dear sir/madam,

Re: Consultation on the Government's Storm Overflow discharge Reduction Plan

CPRE Oxfordshire and CPRE Hertfordshire response

The following is a combined response from both CPRE Oxfordshire and CPRE Hertfordshire.

The Campaign to Protect Rural England (CPRE) Oxfordshire and Hertfordshire are passionate about making the countryside a better place for everyone to live, work and enjoy and we work to improve, protect and preserve the landscape for the benefit of everyone.

We have long been concerned with the practice of discharging untreated sewage into our rivers. In 2021 CPRE Oxfordshire undertook a survey of Oxfordshire's town and parish councils to enable us to gain a better grasp of the current situation and we attach a copy of this report alongside this consultation response. The results were startling, with 1 in 5 of our towns and villages reporting **significant** flooding and/ or sewerage problems.

We are appalled by the lack of ambition in the targets within this consultation. Urgent action is needed now, not in some cases some 28 years away, to address the damage being done to our rivers and streams, wildlife habitats and health of those wishing to enjoy them.

Our response in relation to the questions posed in the online consultation tool are as follows:

1. Are you responding as: Charity
2. Do you know who provides you water and sewerage: Yes
3. If yes, please choose from the list: Thames Water is the main provider in Oxfordshire, with a small area covered by Anglian Water. Affinity Water are the providers in Hertfordshire. Our response relates to Oxfordshire and Hertfordshire; however, we also feel that our responses are applicable in all parts of England.

4. Would you like your response to be confidential: No
5. If yes, Please give your reason: CPRE Oxfordshire and Hertfordshire does not require our response to be confidential and we intend to circulate and publish our response on our website.
6. Do you agree or disagree with the level of ambition of the ecology target: **Strongly disagree**
7. Do you agree or disagree with the level of ambition of the public health in designated bathing water targets? **Strongly disagree**
8. Do you agree or disagree with the level of ambition of the rainfall target? **Strongly disagree**
9. Do you agree that this package of targets as a whole addresses the key issues associated with storm Overflows: **Strongly disagree**
10. If not, can you explain why you do not agree:

It is our view that this consultation falls woefully short in the following areas:

Lack on ambition on targets

Targets in this plan run until 2050, but action is needed much sooner so that improvements can be achieved by 2030.

When looking at the percentage of **total** storm overflows to be improved over time in this plan (rather than just the high priority sites) the lack of ambition in the phasing and numbers is totally apparent and unacceptable. Only just over half (52%) of sites will be addressed by 2040, which is 18 years away. Existing legislation dictates that storm sewerage should only be discharged in “exceptional circumstances”. Water companies are in contravention of this legislation NOW and should be held to account. It would appear that the phasing of this plan is being led by monetary constraints, rather than existing legislation.

Lack of accountability and regulation

The focus of this plan is solely on the water industry but the Government and water authorities need to take action too. The water companies must be held to account by OFWAT.

There must be independent inspection and monitoring of, and reporting on, water companies. The **existing** law must be enforced and there should be a far higher prosecution rate and penalties awarded to water companies who do not comply.

No solution

The aim should be to see an end to sewerage pollution entering UK bathing waters by 2030 and this plan will fail to deliver.

This plan also only focusses on remedial action and must also address longer term infrastructure investment and improvement.

11. Would you be willing to pay more in your monthly water bill in order for water companies to tackle sewerage discharges as outlined in this consultation? **N/A** However, we believe that Ofwat's previous focus has very much been on keeping bills low, to the potential detriment of other considerations. This needs to change to take account broader environmental objectives. Whilst consumers will have to play a part, water companies and shareholders must take a fair share of responsibility.

In summary, we believe this plan lacks ambition and accountability and will fail to deliver for the rivers, streams and wildlife of Oxfordshire and Hertfordshire and their enjoyment by all.

Yours faithfully

Lynda Moore
Planning co-ordinator