

Planning

HEAD OF SERVICE: ADRIAN DUFFIELD



Listening Learning Leading

By email:

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11 May 2022

Dear Sir/Madam,

Consultation on the Government's Storm Overflow Discharge Reduction Plan

Thank you for providing South Oxfordshire District Council with the opportunity to comment on the Government's Storm Overflow Discharge Reduction Plan.

The River Thames and a number of its tributaries flow through South Oxfordshire. The Council is extremely concerned about the many instances and high volumes of untreated sewage being discharged into the River Thames and its tributaries via storm overflows, which can result in serious harm to both human health and the natural environment.

The production of a Storm Overflow Discharge Reduction Plan, as required by the Environment Act 2021, is welcomed. However, the Council considers that the proposed targets within the Storm Overflow Discharge Reduction Plan should be more ambitious. It is also essential that progress towards targets is regularly monitored, reviewed and reported.

Please find the South Oxfordshire District Council's joint response to the consultation attached.

Yours Sincerely,

[REDACTED]
[REDACTED]

South Oxfordshire District Council

Government's Storm Overflow Discharge Reduction Plan
South Oxfordshire District Council Consultation Response

Question 1: Are you responding as:

Other – local authority.

Questions 2/3: Who provides your water and sewerage service?

Thames Water provides water and sewerage services in South Oxfordshire.

Question 4/5: Would you like your response to be confidential?

No.

Question 6: Do you agree or disagree with the level of ambition of the ecology target?

Disagree.

Reasons:

- The timescales for achieving targets should be more ambitious, reflecting the fact that storm overflow discharges are only permitted in exceptional circumstances.
- The interpretation of 'no local adverse ecological impact' should take account of phosphates and nitrates in addition to ammonia and dissolved oxygen.
- In addition to the high priority sites proposed to benefit from sub-targets, opportunities to support forthcoming Nature Recovery Strategies and Nature Recovery Networks should be considered.

Question 7: Do you agree or disagree with the level of ambition of the public health in designated bathing waters target?

Disagree.

Reason:

- The proposed target for public health is focused on designated bathing waters. The vast majority of designated bathing waters in England are coastal waters. There are very few inland designated bathing waters. Therefore, the majority of people using inland waters for leisure and recreation would not receive any benefit/protection from the proposed target. If this target were to be included in the Storm Overflow Discharge Reduction Plan, a much greater number of inland bathing water designations would be required to appropriately protect the health of people using inland waters for leisure and recreation.

- Whilst the number of people using outdoor waters for leisure and recreation may peak during the 'bathing season', it should be recognised that a number of people will use outdoor waters year-round. Public health protection should therefore be consistent year-round.
- Sub-targets should be considered to deliver water quality improvements sooner where possible.

Question 8: Do you agree or disagree with the level of ambition of the rainfall target?

Disagree.

Reasons:

- The headline target should be more ambitious, reflecting the fact that storm overflow discharges are only permitted in exceptional circumstances. An average of 10 rainfall events per year is considered too high and this figure should be reduced. The target date should be sooner than 2050.
- Using an average figure could hide where storm overflows are discharging more frequently. This could allow some areas to continue to suffer high levels of harm.
- The sub-target for screening controls should also be more ambitious. The target date should be much sooner than 2050.

Questions 9: Do you agree that this package of targets as a whole addresses the key issues associated with Storm Overflows?

Disagree.

Question 10: If you do not agree, can you explain why not?

See responses to Questions 6-8 above.

Question 11: Would you be willing to pay more in your monthly water bill in order for water companies to tackle sewage discharges as outlined in this consultation?

Investment to tackle sewage discharges should come from the water companies themselves and should not be solely, if at all, borne by bill payers.

Pressure on households that are already struggling due to the rising cost of living should be minimised.