

WILD TROUT TRUST

Postal address: Freepost WILD TROUT TRUST 023 9257 0985
www.wildtrout.org office@wildtrout.org director@wildtrout.org

Defra

c/o StormOverflowsPlanConsultation@defra.gov.uk; consultation.coordinator@defra.gov.uk

25 April 2022

Dear Sir/Madam

Storm Overflow Reduction Plan Consultation

The Wild Trout Trust (WTT) is a conservation charity working through a team of expert Conservation Officers with landowners, local communities, fishing clubs, rivers trusts and government agencies across the UK and Ireland, to offer practical advice and deliver hands-on habitat improvement projects.

We are responding through this letter to the Storm Overflow Reduction Plan Consultation, addressing those consultation questions relevant to our work, experience and expertise.

We believe that the privatised water industry is, in many towns and cities of England, dealing with aged infrastructure, that it is an industry that has under-invested in that infrastructure and been poorly regulated. Operator self-monitoring is not working to protect our environment. There is a strong case that Defra should step away, empower Ofwat and the Environment Agency to regulate firmly and consistently and thus force the industry to sort the problem. There should also be an expectation that the industry funds legal compliance, without passing significant cost to the customer. There *must* be a holistic approach to water management, with planning policy driving housing development to sustainable water use/reuse.

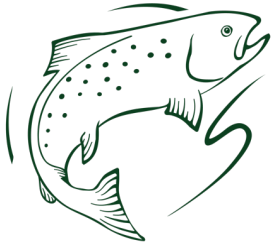
We welcome the ambition of the “...*complete elimination of ecological harm from storm overflows*” but question aspects of such ambition in the Plan. The consultation document foreword begins “*Improving water quality is a priority for this government*”, yet no more than 800 improvements to sewer overflows are planned in the period 2020-2025, leaving 14000 unimproved in the interim, to continue to pollute rivers. Moreover, the far-distant target dates set for the various measures do not reflect improving water quality as a priority or the required urgency, especially in the face of an increasingly unpredictable climate.

The headline target to protect the environment seeks to limit permitted spills to where there is no local adverse ecological impact but that is only measured by ammonia and dissolved oxygen, ignoring a myriad of known and still emerging harmful contaminants. More refined, detailed and objective criteria need to be established to define no ecological impact.

Currently, the rainfall targets describe frequency (on average, no more than 10 spills per year) and duration, up to 12 continuous hours counting as a single spill. However, in the absence of quantification of volume, these targets are meaningless. High volumes of sewage spilling into a river on a monthly basis for up to 12 hours may very well and obviously be extremely environmentally harmful, yet they will be allowed through another generation of people.

Registered Charity No. 1162478 (England & Wales), SCO46354 (Scotland) Charitable Company No. 03345901

Registered company address: 13-17 Paradise Square, Sheffield S1 2DE



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We believe that potable water is too cheap; it is viewed as disposable. We recognise that many households in England may need support to meet modest increases in water bills; the figure described in the Plan of 7p/household/day (2025-2030) seems a price worth paying *if* it protects our environment for the future.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Shaun Leonard', enclosed in a light grey rectangular box.

Shaun Leonard
Director, Wild Trout Trust