



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear Sir/Madam,

Re: CPRE Oxfordshire response to Thames Water draft Drainage and Wastewater Management Plan (DWMP) 2025 – 2050

Background

In 2021 CPRE Oxfordshire surveyed the 314 Parish and 15 Town Councils in Oxfordshire about the state of flooding and sewerage within their parishes (<https://www.cpreoxon.org.uk/news/1-in-5-oxfordshire-towns-and-parishes-face-flooding-and-pollution-issues/>). We received 83 replies (we assume those replying were the ones with the most serious flooding and water pollution problems). The majority of respondents reported significant flooding and/or sewage related problems in their area – this amounts to at least 1 in 5 of our local towns and parishes. Across Oxfordshire in 2020 105 sewerage works have a record of spilling, 87 spills were active for over 100 hours and 36 for over 1000 hours.

According to the draft DWMP across the Thames valley there were in 2021 14,713 sewer overflows, totalling 163,090 hours and only 6% of rivers across meet ‘good’ ecological status in accordance with the Water Framework Directive.

The proposed Thames Valley DWMP targets aim to stop internal and external sewer flooding up to a 1 in 50-year storm event where possible and eliminate harm from sewer overflows - no more than 10 spills average per year by 2050.

The draft DWMP framework was published in 2019, the plan will start in 2025. There is a phased implementation of proposed measures. For the Thames Valley region (excluding London) £8 billion investment is proposed by 2050 but for the AMP8 (2025 to 2030) period the investment is only £493 million, 62% of the investment (and hence river improvements) are proposed for the final decade 2040 to 2050 (see table 6c of Technical Summary).

The Thames Water 2050 vision is: *‘Preventing all sewer flooding and wastewater pollution; leading wider efforts to restore river health and create thriving natural environments’* – see for example, page 9 of non-technical summary. Despite this corporate vision, and the ever-increasing public awareness and concern over river pollution, the draft DWMP falls short and only proposes by 2050 to stop sewer flooding for



floods of less than the 1 in 50 year storms and proposes to continue to allow sewerage spills from sewerage works.

The DWMP does identify the challenges in the south-east of a growing population, loss of permeable surfaces associated with increasing urbanisation of the countryside and the impacts of our changing climate.

CPRE view

CPRE welcomes the strategic planning underlying the DWMP framework. We also welcome the commitment to reduce, and possibly eliminate, pollution incidents across our river system. We are also pleased to see the extensive stakeholder involvement and are encouraged to note that the stakeholders would like to see a focus on nature based solutions, improvement of the environment and an ambition which goes beyond statutory requirements.

CPRE believes, however, that the process lacks ambition and urgency. The River Thames and its tributaries are a defining aspect of Oxfordshire. The rivers are increasingly being used for leisure and wellbeing activities and yet it is clear the water quality is already often poor and the number and duration of sewerage spills already unacceptable. The reports rightly identify the future challenges: rising population, urbanisation and climate change, and yet water quality problems are already with us.

The DWMP should be setting really challenging targets. It is unacceptable that sewerage flooding and spills should be still planned for in 25 years time. It is perverse that the DWMP should be planning for a target which is less ambitious than the Thames Water Corporate vision. ***CPRE asks for a complete elimination of sewerage flooding and spills by 2050 at the latest.***

The timescales for improvements outlined in the DWMP is unacceptable. The problems exist now, and emergency actions should be started now and then incorporated into a strategic post 2025 plan.

Turning to the post 2025 plan, the investment needs to be top loaded to the beginning of the plan. Oxfordshire (and elsewhere) has already experienced rapid population growth and urbanisation in the past decade and this is planned to accelerate in the coming decade. If anything population growth will then decrease in the 2030s and 2040s (according to ONS projections). Climate change is already with us – with increasing drought and episodes of intense rainfall. Therefore, the plan for the majority of the investment (over 60%) after 2040 is perverse and suggests a strategy of fixing symptoms not strategic planning for anticipated problems. ***CPRE asks for a rapid escalation in investment in the coming decade commensurate with fixing existing problems and dealing with the housing development already planned for the next decade.***

The environment quality of the River Thames and its tributaries should be of paramount importance. The Thames basin includes the globally important chalk streams and river corridors that are a vital wildlife refuge and an essential component of the draft Nature Recovery Network for Oxfordshire. ***CPRE calls for rapid and urgent action to restore and protect our rivers.***



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Yours faithfully

Richard Harding

Chair CPRE Oxfordshire