
# State of the South Hams River Constituency

## Working together to improve river health by 2027

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Chair Avon River Champions

Avon River Champions is a catchment community group that aims to restore the ecological; health of the River Avon in South Devon.

We work closely with other local catchment community groups - Friends of Salcombe Kingsbridge Estuary and Sustainable Blackawton who campaign for water quality in the River Gara & Slapton Ley and the Salcombe & Kingsbridge Estuary.

W are campaigning at local and national government level to promote understanding of the key failures of the regulatory system and create awareness of the local sources of pollution within River Constituencies.

We have embarked on a regional political campaign using the **Devon River Manifesto** as a platform to encourage cross-party collaboration on the reform of our regulatory system.

We are sharing our own **Blue Print** for communities to make a local catchment plan for the restoration of good ecological status of all rivers in Devon by 2027.

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Bigbury Net Zero is a community group which focusses on habitat restoration and environmental protection by reducing reliance on fossil fuels.

The **Planet Bigbury** campaign was launched in January 2025 It has four prioritises

- Support local businesses
- Restore and protect natural habitats
- Reduce reliance on fossil fuel & increase use of renewable energy
- **Protect the River Avon and Bigbury Bay from pollution**

BNZ has created a **Community Chest** to channel donations from businesses, organisations and individuals into small projects undertaken by the local community to meet the above aims.


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# The State of River Constituencies in South Hams

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# State of River Constituencies in Devon

Rivers, tributaries, lakes, and estuaries cross political boundaries. Commitment to their protection should be apolitical and integrated,

"**River Constituencies**" are proposed as regions that span these boundaries, encouraging cross-party collaboration between MPs and local government Councillors representing the people living in these river catchments.

**Avon River Champions** have complied these " State of our River Constituency" reviews, featuring publicly available data from the Environment Agency, to help MPs and local government Councillors to foster local discussions on practical solutions to river pollution in Devon.

River Constituencies in Devon.

- North Devon **Ian Roome MP**
- Torridge & Tavistock **Geoffrey Cox MP**
- South Hams **Rebecca Smith MP & Caroline Voaden MP**
- SW Devon, Plymouth Moorview & Plymouth Sutton & Devonport **Rebecca Smith MP, Fred Thomas MP and Luke Pollard MP**
- South Devon, Central Devon and Torbay **Caroline Voaden MP, Mel Stride MP** and **Steve Darling MP**
- Tiverton & Minehead, Exeter, Exmouth & Exeter East, Honiton & Sidmouth **Rachel Gilmour MP, Steve Race MP, David Reed MP, Richard Foord MP**
- Newton Abbot **Martin Wrigley MP.**

# The State of River Constituencies in South Hams

**Rebecca Smith MP**
River Constituency river catchments for **Plym, Tavy, Yealm and Erme**

2,430 spills
Total 21,285 hours

**Caroline Voaden MP**
River Constituency river catchments for **Avon, Gara, Slapton Ley, Dart, Erme and Kingsbridge Salcombe Estuary**

5,206 spills
Total 52,226 hours

Ref: Investigate menu (Constituencies)
Rivers Trust Sewage Map 2024

# Executive Summary

**How bad is river and estuary pollution in** the River Constituencies of South Hams?

## Ecological status

The Environment Agency (EA) classifies the **ecological status** of **sections of rivers** by measuring a wide range of biological and chemical factors over a 6 year period. The current classifications in the table below* will be updated on 2025, based on evidence gathered over the previous 6 years.

Rivers are divided into smaller sections (**water bodies**), each of which have their own Ecological classifications. The Water Framework Directive will not permit a whole river to be designated of Good Ecological status unless all water bodies and parameters assessed, including 'forever chemicals', achieve 'good' ecological status. These forever chemicals have now been banned but the EA estimates that it will take until 2063 for these chemicals to dissipate.

**59 % of our water bodies in South Hams are NOT of Good Ecological status.**
**41 % of our water bodies in South Hams ARE Good Ecological status**
**8 % are of Poor/Bad Ecological status**

59 % of our water bodies are NOT of Good Ecological status.
41 % of our water bodies ARE Good Ecological status
8 % are of Poor/Bad Ecological status

| | Poor | Moderate | Good | Excellent |
|---|---|---|---|---|
| Dart, Start Bay & Torbay 26 water bodies) Tor Bay Water Body Dart Estuary Water Body | 3 | 13 | 12 | 0 |
| Avon, Salcombe & Kingsbridge River basin (7 water bodies) Avon Estuary Salcombe Harbour Kingsbridge Estuary | 0 | 6 | 4 | 0 |
| River Erme (5 water bodies) Erme Estuary Water Body | 1 | 4 | 1 | |
| River Yealm (5 water bodies) Yealm Estuary | | 2 | 3 | |
| Total (%) | 4 (8%) | 25 (51%) | 20 (41%) | 0 (0%) |

Table above: The total numbers of individual water bodies in each Operational Catchment classified as Poor, Moderate, Good or Excellent Ecological status* Ref EA Catchment Explorer.

## Reasons for Not Achieving Good (ecological status) RNAG

The EA Catchment Explorer indicates the **Sectors responsible** for the failure to achieve good ecological status and the activities of that Sector which have led to this. The table below excludes pollution and RNAG from urban and transport sources.

**59% of the RNAG is attributed to AGRICULTURE**
**41% of the RNAG is attributed to SOUTH WEST WATER**

59% of the RNAG is attributed to AGRICULTURE
41% of the RNAG is attributed to SOUTH WEST WATER

| Water bodies | Agriculure RNAG | SWW RNAG |
|---|---|---|
| Dart, Start Bay & Torbay 26 water bodies) Tor Bay Water Body Dart Estuary Water Body | 22 | 12 |
| Avon, Salcombe & Kingsbridge River basin (7 water bodies) Avon Estuary – Salcombe Harbour Kingsbridge Estuary | 11 | 8 |
| River Erme (5 water bodies) Erme Estuary Water Body | 8 | 5 |
| River Yealm (5 water bodies) Yealm Estuary | 1 | 4 |
| Total RNAG and (%) of Agric +SWW | 42 (59%) | 29 (41%) |

## South West Water

Water companies are a monopoly. Ofwat was set up to prevent water companies from profiting at the expense of customers and the environment. Ofwat has to approve the 5-yr business plans of water companies (**A**sset **M**anagement **P**lans).

We are now in **AMP 8** and have had the highest ever customer bill price hikes. Ofwat reports (Feb 25) that water companies are consistently failing to meet the environmental targets in their AMP. **Asset Management Plans are not legally binding.**

**Ofwat approves the AMP** and allows monopoly water companies to guarantee dividends to investors and has failed to curtail bonuses to CEOs of water companies. (QR ref right)

## Environment Agency

The Environment Agency has failed to monitor compliance of SWW with the **Discharge Permits** (issued by EA) that allow all water companies to discharge untreated effluent (CSO) into our rivers under '**exceptional weather**' circumstances.

A CSO is illegal if it happens outside exceptional weather conditions. This is called a **Dry Weather Flow**. The EA is the only body with the legal powers to enforce compliance with Discharge Permits. The failure of the EA to enforce compliance with Discharge Permits has created the culture of '**profit before the environment**' for all water companies. BBC Investigations reveal that Dry Weather Flows are the commonplace. (QR ref right)

## Catchment-Sensitive Farming

Government has put 'on hold' all new applications to Catchment Sensitive Farming for capital grants (2025/26) to reduce agricultural pollution.

UK farmers do not have a monopoly market nor sufficient government support to guarantee their profitability.

- Post Brexit two fifths of farmers earn less than £25,000 income each year.
- Only15 per cent of all farms make a profit.

Devon County Council reports that **without the Basic Payments Scheme farmers in Devon would not be viable**. Farmers often need administrative support to apply for all relevant grant schemes. (QR ref right)

"Despite the sector committing to reduce pollution incidents by 30% in the 2020-25 period, and achieving a reduction of 15% from 2019 to 2022, the increase in pollution incidents in 2023 means there has now only been a 2% reduction to date.

On leakage, companies have only achieved a reduction of 6% on an annual basis to date, against a target of 16% by 2025.

The sector committed to reduce internal sewer flooding incidents by 41%, but four years in it has achieved a 10% reduction".

"Every major English water company has reported data suggesting they've discharged raw sewage when the weather is dry – a practice which is potentially illegal.

BBC News has analysed spills data from nine firms, which suggests sewage may have been discharged nearly 6,000 times when it had not been raining in 2022 - including during the country's record heatwave".

"Last year we saw huge demand, with some applications worth over £1 million. Funds were used up quickly and many farmers missed out. The new Funding Caps aim to ensure smaller farms and high-priority projects get a fair chance."

## Designated Bathing Waters (DBW)

Over the last 15 years the Government has cut the budget for the EA water quality monitoring teams by about 50%. This has affected the frequency and number of sites sampled to assess **general river water quality**. This has contributed to the failure to meet legally binding targets for all rivers to be of Good health by 2027.

The depleted EA water quality monitoring teams must give priority to DBW monitoring at the expense of obligations for general river water quality monitoring.

All new applications for DBW have been put **'on hold'** following a surge in applications in 2024. Designation increases the costs of monitoring water quality by the Environment Agency and raises expectations of improved water quality which are not being met. The public consultation on a review of the **Bathing Water Directive** closed (Dec 24). Results not yet published.

South West Water executive, Carolyn Cadman, revealed at the **Devon Water Summit** (Dec 2024) that the SWW next 5-yr business plan would only focus on improved hydraulic capacity of treatment works that spilled into **DBW** or **Shellfish Production** areas in rivers - or had 'high' spill events. Devon has 115 of the national 450 DBW. The EA budget for monitoring river water quality generally has been slashed by 50% over the last 10 years.

Devon hosts 25% of the DBW in the country but continues to suffer from lack of SWW investment in the hydraulic capacity of its treatment assets. Promises of investment by SWW in their Asset Management Plans agreed with Ofwat are not legally binding (see p5).

"Despite the sector committing to reduce pollution incidents by 30% in the 2020-25 period, and achieving a reduction of 15% from 2019 to 2022, the increase in pollution incidents in 2023 means there has now only been a 2% reduction to date.

On leakage, companies have only achieved a reduction of 6% on an annual basis to date, against a target of 16% by 2025.

The sector committed to reduce internal sewer flooding incidents by 41%, but four years in it has achieved a 10% reduction".

## Island Assembly (Clean Rivers, Clean Seas)

In the absence of sufficient and immediate support from Government, Regulators and South West Water to get all rivers to Good health by 2027 - the Island Assembly will propose priorities for a **BluePrint Project** for community-led support for Farmers and Landowners who can lead the immediate restoration works needed.


## The BluePrint Project

Avon River Champions have teamed up with **Friends of Salcombe Kingsbridge Estuary,** and **Sustainable Blackawton** to develop and implement the BluePrint Project**.**

**River Water Quality Groups** create and support the catchment community endeavour of **stakeholders in all sectors** to restore our water bodies to good health by 2027. River Water Quality Groups use the existing local government framework of parish and town councils to bring together local stakeholders:

- **Householders**
- **Estates, farms and landowners**
- **Businesses**
- **Local government**
- **Community groups**
- **Environment Organisations**
- **South West Water**
- **Environment Agency**

BluePrint Project

Devon River Manifesto

## Devon Rivers Manifesto

Avon River Champions published the. Devon Rivers Manifesto to support our elected MPs wanting to collaborate in a cross-party initiative to restore the health of our rivers in Devon by 2027.

Politicians and local government Councillors have the power to dictate the mandate and allocate the budgets needed to restore the health of our rivers.

With their support we can focus on the sources of pollution in our River Constituencies and develop a **Blue Print Project** for small local catchment plans to solve the problem across Devon.

# The State of the South Hams River Constituency

Use the links below to view the updated information on the Environment Agency's Catchment Explorer website for the data presented in Tables 1 to 4.

- Dart Start Bay and Torbay
- Avon Salcombe and Kingsbridge
- Erme
- Yealm

# Introduction

The following pollution data covers all catchments in the South Hams and is offered as a review for **local government** and our **MPs** in the River Constituency. It will serve as a reference to **River Water Quality** Groups comprising parish councils in each river catchment. .

The **BluePrint Projec**t focuses on three catchments: **River Avon, River Gara & Slapton Ley** and the **Salcombe Kingsbridge Estuary.** It could be used to assist in the design of other catchment plans in Devon.

Stakeholders in South Hams, outside the BluePrint Project catchments, are encouraged to contact their own catchment community groups operating in the various catchments of South Hams.

The South Hams is endowed with strong local catchment community groups already implementing many of the programmes outlined in this publication.

These groups have already shared much good practice between catchments and are collectively providing catchment groups in other parts of Devon with exemplary programmes.

- **Yealm Estuary to Moor**
- **Wild About the Erme River**
- **Avon River Champions**
- **Sustainable Blackawton**
- **Friends of Salcombe Kingsbridge Estuary**
- **Friends of the Dart**

## Directory of Catchment Groups in Devon

Community river catchment groups are emerging throughout Devon.

Avon River Champions have created a Directory of known groups in North and South Devon to enable regional stakeholder to make contact with these groups.

For more information
www.avon-river-champions.org .

# Ecological Status and RNAG

Ref: Environment Agency data from catchment Explorer

OTHER Cause of RNAG 'Forever Chemicals' now banned but may take until 2063 to dissipate e.g. Polybrominated diphenyl ethers (PBDE) & mercury compounds.

## Table 1: DART, START BAY & TORBAY

## River basin and Estuary water bodies

Reasons for Not Achieving Good Ecological Status 2023

Polybrominated diphenyl ethers (PBDE) & mercury compounds applies to **all** water bodies

| Water bodies | Eco status | Agriculture (22) | SWW (12) | Other Sectors (2) |
|---|---|---|---|---|
| Am Brook | MODERATE | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Ashburn | GOOD | | | |
| Avon (Devon Tidal) Sth Hams - Blackpool | GOOD | | | |
| Avon (Devon Tidal) Sth Hams - Slapton | POOR | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Bidwell Brook | MODERATE | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Blackbrook River | MODERATE | | | |
| Cherry Brook | MODERATE | | | |
| Dart | MODERATE | | Surface water abstraction | |
| Dart (Tidal) | MODERATE | poor livestock management | sewage discharge (continuous) | |
| Dean Burn | GOOD | | | |
| East Dart River | GOOD | | | |
| East Webburn River | POOR | | | |
| Harbourne River | GOOD | | | |
| Hems - Lower | MODERATE | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Hems - Upper | GOOD | | | |
| Mardle | GOOD | | | |
| Slapton Ley | MODERATE | poor livestock management (2) | sewage discharge (continuous) (2) | septic tanks (2) |
| | | | sewage discharge (intermittent) (2) | |
| Swincombe | POOR | | Surface water abstraction | |

## Table 1: DART, START BAY & TORBAY (cont.)

| Water bodies | Eco status | Agriculture (22) | SWW (12) | Other Sectors |
|---|---|---|---|---|
| The Gara | MODERATE | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Venford Reservoir | MODERATE | poor livestock management | | |
| Wash | GOOD | | | |
| Webburn | GOOD | | | |
| West Dart River (Blackbrook to Swincombe) | GOOD | | | |
| West Dart River (Lower) | GOOD | | | |
| West Dart River (Upper) | MODERATE | | water abstraction | natural conditions |
| West Webburn River | MODERATE | | | |

| ESTUARIES | | | | |
|---|---|---|---|---|
| Dart Estuary Water Body | MODERATE | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Tor Bay Water Body (Torbay coastal waters) | GOOD | | | |

**Note:**
The information o**n Slapton Ley** (Table 1) and **The Gara** (Table 2) is relevant to the BluePrint Project catchment (River Gara and Slapton Ley, although they are recorded in the Dart Start Bay and Torbay Operational Catchment as defined by the Environment Agency in Catchment Explorer.

## Table 2: AVON SALCOMBE & KINGSBRIDGE
## River basin and Estuary water bodies

Reasons for Not Achieving Good Ecological Status 2023
Polybrominated diphenyl ethers (PBDE) & mercury compounds – applies to **all** water bodies

| Water Bodies | Eco status | Agriculture (11) | SWW (8) | Other Sectors |
|---|---|---|---|---|
| Avon (DevonTidal) Sth Hams - Frogmore | MODERATE | riparian/in-river activities (inc bankside erosion | sewage discharge (continuous) | |
| Avon - Lower | GOOD | | | |
| Avon - Upper | GOOD | | | |
| Avon Dam Reservoir | MODERATE | | | Reservoir / Impoundment - non flow related |
| Small Bk | GOOD | | | |
| Torr Bk | MODERATE | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Upper Avon | MODERATE | | | Natural conditions |

| ESTUARIES | | | | |
|---|---|---|---|---|
| Avon Estuary | GOOD | | | |
| Kingsbridge Estuary | MODERATE | poor nutrient management (2) | sewage discharge (continuous) (3) | Urbanisation - urban development |
| | | poor livestock management (2) | sewage discharge (intermitent) (3) | |
| | | poor soil management (3) | | |
| Salcombe Harbour | MODERATE | | | |

## Table 3: ERME
## River basin and Estuary water bodies

Reasons for Not Achieving Good Ecological Status 2023
Polybrominated diphenyl ethers (PBDE) & mercury compounds – applies to **all** water bodies

| Water bodies | Eco status | Agriculture (8) | SWW (5) | Other Sectors |
|---|---|---|---|---|
| Ayleston Brook | MODERATE | Riparian/in-river activities (inc bankside erosion) | sewage discharge (continuous) | |
| | | | sewage discharge (intermittent) | |
| Erme | POOR | | | Natural Barriers ecological discontinuity |
| Lower Erme | MODERATE | Farm/site infrastructure (2) | Sewage discharge (continuous) (2) | |
| | | Riparian/in-river activities (inc bankside erosion) (2) | | |
| | | | | |
| Lud Brook | MODERATE | poor nutrient management | sewage discharge (continuous) | |
| | | poor livestock management | | |
| | | poor soil management | | |
| Sheepham Bk | GOOD | | | |

| ESTUARIES | | | | |
|---|---|---|---|---|
| Erme Estuary Water Body | MODERATE | | | |

## Table 4: YEALM
## River basin and Estuary water bodies

Reasons for Not Achieving Good Ecological Status 2023
Polybrominated diphenyl ethers (PBDE) & mercury compounds – applies to **all** water bodies

| Water body | Ecological status | Agriculture (1) | SWW (4) | Other Sectors |
|---|---|---|---|---|
| Lower River Yealm | GOOD | | | |
| Newton Stream | MODERATE | | Sewage discharge (continuous) (3) | |
| Piall | MODERATE | Poor nutrient management | Sewage discharge (continuous) | |
| Silverbridge Lake | GOOD | | | |
| Upper River Yealm | MODERATE | | Surface water abstraction | NATURAL Barriers - ecological discontinuity; NATURAL mineralisation |

| ESTUARIES | | | | |
|---|---|---|---|---|
| Yealm Estuary | GOOD | | | |

**Note:**
**Tables 5 to 11** refer to South West Water treatment works in the three river catchments in the Blueprint Project - **River Avon, River Gara & Slapton Ley and the Salcombe Kingsbridge Estuary.**

It has been obtained by manually selecting information on individual treatment works featuring in the Rivers Trust Sewage Map and clicking on the crop down menu of each treatment work to provide information in these tables. This data does not include information from the Rivers Yealm, Erme or Dart.

This data facilitates collaboration between P**arishes and Wards River Water Quality Groups**

Table 5: Sewer Overspills in Blue Print River Constituencies by SHDC Wards (2023)

| Location | Trt works | No. events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| East Allington | WWTW | **76** | **1,251** | Small Brook | SWWA 852 | Allington & Strete |
| Slapton | WWTW | **97** | **1,417** | Start Bay / Slapton Ley | 203034 | Allington & Strete |
| East Charleton | PS | **49** | **953** | Tributary Frogmore Creek | 201660 | Allington & Strete |
| West Charleton | STW | **70** | **484** | Charleton Stream | 203206 | Allington & Strete |
| Kimberleigh Nurseries | SSO | **80** | **95** | The stream | 201721 | Allington & Strete |
| Strete | WWTW | **83** | **837** | Start Bay | 203410 | Allington & Strete |
| Sherford | WWTW | **262** | **3,132** | Sherford Stream | NRA-SW-6171 | Allington & Strete |
| East Charleton | PS | **49** | **953** | Tributary Frogmore Creek | 201660 | Allington & Strete |
| **TOTAL** | | **766** | **9,122** | | | Allington & Strete |
| Blackawton | STW | **113** | **1,619** | Blackawton Stream | NPSWQD0069 16 | Blackawton & Stoke Fleming |
| Moreleigh | STW | **135** | **1,665** | Tributary of Torr Brook | NRA-SW-6964 | Blackawton & Stoke Fleming |
| Stoke Fleming | PS | **94** | **1,479** | Cove Stream | 203363 | Blackawton & Stoke Fleming |
| **Salcombe & Thurleastone** | | **342** | **4,763** | | | Blackawton & Stoke Fleming |
| Brent Mill CSO | CSO | **42** | **179** | River Avon | 201720 | South Brent |
| Diptford | STW | **122** | **876** | River Avon | 200400 | South Brent |
| South Brent | WWTW | **131** | **2,065** | River Avon | DRA 1062 | South Brent |
| **TOTAL** | | **295** | **3,120** | | | South Brent |
| East Prawle | STW | **146** | **1,791** | coastal stream | 202193/CS/01 | Stokenham |
| Torcross | PS | **33** | **602** | Start Bay | 203035 | Stokenham |
| **TOTAL** | | **179** | **2,393** | | | Stokenham |

Table 6: Reason given by SWW for high spill count and hours 2023 :
**HYDRAULIC CAPACITY**

| Location | Trt works | No. events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| South Milton | STW | **93** | **1,512** | South Milton Stream | NRA-SW-3548 | Salcombe & Thurlestone |
| Blackawton | STW | **113** | **1,619** | Blackawton Stream | NPSWQD0069 16 | Blackawton & Stoke Fleming |
| **TOTAL** | | **206** | **3,131** | | | |

Table 7: Reason given by SWW for high spill count and hours 2023:
**PERFORMANCE INFILTRATION**

| Location | Trt works | No. events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| Loddiswell | WWTW | **95** | **188** | River Avon | DRA 1349 | Loddiswell & Aveton Gifford |
| **TOTAL** | | **95** | **118** | | | |

Table 8: Reason given by SWW for high spill count and hours 2023:
**FINAL TREATED EFFLUENT**

| Location | Trt works | No. events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| Bigbury & Challaborough Bay | STW | No data | No data | Bigbury Bay | 200261/FN/01 | Charterlands |
| Burgh Island Hotel | Private STW | No data | No data | Bigbury Bay | : 3052/8/5 | Charterlands |

Tabke 9: Reason given by SWW for high spill count and hours 2023:
**SENSOR FAILURE**

| Location | Trt works | No. events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| Brent Mill CSO | CSO | **42** | **179** | River Avon | 201720 | South Brent |
| TOTAL | | **42** | **179** | | | |

Table 10 : Reason given by SWW for high spill count and hours 2023:
**EXCEPTIONAL WEATHER**

| Location | Trt work | Number events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| Ringmore | STW | **69** | **1,474** | Ringmore Stream | | Charterlands |
| East Allington | WWTW | **76** | **1,251** | Small Brook | SWWA 852 | Allington & Strete |
| Slapton | WWTW | **97** | **1,417** | Start Bay / Slapton Ley | 203034 | Allington & Strete |
| TOTAL | | **242** | **4,142** | | | |

Table 11: Reason given by SWW for high spill count and hours 2023:
**NO REASON RECORDED**

| Location | Trt work | Number events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| Aveton Gifford | WWTW | **9** | **72** | Avon River Estuary | 201967 | Loddiswell & Aveton Gifford |
| Malborough Ejector Ps | SSO | **36** | **189** | Trib Of Blanksmill Creek (S). | 203408 | Salcombe & Thurlestone |
| Baston Green | PS | **48** | **388** | Baston Creek | NRA-SW-7652/PC/1 | Salcombe & Thurlestone |
| East Charleton | PS | **49** | **953** | Tributary Frogmore Creek | 201660 | Allington & Strete |
| **TOTAL** | | **142** | **1.602** | | | |

Tabel 12: Reason given by SWW for high spill count and hours 2023:
**ON-GOING INVESTIGATION**

| Location | Trt work | Number events | Total spill hrs | Spilling into water body | Discharge Permit No. | SHDC Ward |
|---|---|---|---|---|---|---|
| Diptford | STW | **122** | **876** | River Avon | 200400 | South Brent |
| South Brent | WWTW | **131** | **2,065** | River Avon | DRA 1062 | South Brent |
| Moreleigh | STW | **135** | **1,665** | Tributary of Torr Brook | NRA-SW-6964 | Blackawton & Stoke Fleming |
| Stoke Fleming | PS | **94** | **1,479** | Cove Stream | 203363 | Blackawton & Stoke Fleming |
| Quillettes | CSO | **43** | **26** | Tributary Of Combe Stream. | NRA-SW-7653/CS/1 | Salcombe & Thurlestone |
| Comminutor House | SSO | **123** | **269** | Shadycombe Creek - Salcombe | 003218/CS/01 | Salcombe & Thurlestone |
| West Charleton | STW | **70** | **484** | Charleton Stream | 203206 | Allington & Strete |
| East Charleton | PS | **49** | **953** | Tributary Frogmore Creek | 201660 | Allington & Strete |
| Kimberleigh Nurseries | SSO | **80** | **95** | The stream | 201721 | Allington & Strete |
| Strete | WWTW | **83** | **837** | Start Bay | 203410 | Allington & Strete |
| Sherford | WWTW | **262** | **3,132** | Sherford Stream | NRA-SW-6171 | Allington & Strete |
| Prince of Wales | CSO | **58** | **154** | Kingsbridge Estuary | 203437 | Kingsbridge |
| East Prawle | STW | **146** | **1,791** | coastal stream | 202193/CS/01 | Stokenham |
| Torcross | PS | **33** | **602** | Start Bay | 203035 | Stokenham |
| **TOTAL** | | **1,570** | **17,263** | | | |



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The **Water Framework Directive** makes it a legal obligation that all water bodies achieve Good Ecological Status (GES) by 2027.

Whilst EA monitoring data continues to accumulate and identify the **Reasons for Not Achieving Good** ecological status, there is disappointingly little evidence that the data is influencing Government priorities and budgets or investments by SWW.

The **Office of Environmental Protection,** is the government body which monitors the compliance of Government to existing legislation. They reported in November 2024, that the Government would miss this target by a long margin.

The lack of transparency, accountability and progress is compromising public faith in the 'regulatory process' and the implementation of existing laws.

We urgently need to develop an enabling environment to **restore river health by 2027.**

Avon River Champions proposes the **BluePrint Project** as a means to restore the health of our rivers by 2027.

**We want rivers in Devon to be of GOOD Ecological status by 2027.**

# The BluePrint Project

A Call to Action for Catchment Communities in the **River Avon, River Gara & Slapton Ley and Salcombe Kingsbridge Estuary.**

The catchments for the BluePrint project extend across the parliamentary constituency of **South Devon** and overlap with several Environment Agency (EA) Operational Catchments.

RIVERS

- Dart Start Bay and Torbay
- Avon Salcombe and Kingsbridge

ESTUARIES

- Avon Estuary
- Salcombe Harbour and Kingsbridge Estuary

The community-led BluePrint Project is a collaborative project built on local relationships, trust and mutual respect. See guidance in the following sections on:

- **Collaboration**
- **Evidence**

Our MP, local government and community organisations are invited to:

1. Familiarise themselves with the information collated in this review on the **Ecological status** of the water bodies in their catchments and the **Reasons for Not Achieving 'Good'** in each water body.

2. Consider **existing sewage pollution** from local SWW treatment works before **consenting to planning applications** for more houses served by the same treatment works. Insist on **Sustainable Urban Drainage Solutions** for all new property development.

3. Create **River Water Quality Groups** composed of neighbouring parish councils in a river catchment (river valley from Dartmoor to the Sea) to:

    - Work with your local river catchment community groups (**Avon River Champions, Sustainable Blackawton a**nd **Friends of Salcombe Kingsbridge Estuary**) to collect current, reliable data on the extent and the sources of pollution to inform collaborative solutions to restoring all water bodies to good health by 2027.

    - Co-fund **eDNA water analysis** by Applied Genomics to determine the relative scale of pollution from agriculture or SWW in our local water bodies in order to prioritise any interventions needed locally.

    - Bring together local stakeholders to create local catchment plans to resolve the agricultural RNAG with local farmers, organise volunteer support and raise funding to implement **Nature-based Solutions** to pollution.

    - Recruit and train **citizen scientist investigators** through the Westcountry Rivers Trust and create a **River Guardian** role for each parish, equivalent to parish tree wardens, to support citizen scientists and collate local data.

    - Engage with **local businesses** and invite them to develop river-sensitive drainage and water use.

    - Engage with **local householders** and invite them to develop river-sensitive drainage and water use.

    - Engage with SWW to **prioritise capital investment** in improved hydraulic capacity where eDNA data confirms the scale of pollution from SWW treatment works. Where this is not possible, consider the **installation of Nature-based Solutions in collaboration with local landowners** and community groups.

**Own the problem.**
**Find the solution.**

# Collaboration
# River Water Quality Groups

The many tributaries that feed into a main river may pass through several riparian parishes. Pollution sources upstream could affect the ecological status of water bodies downstream. It makes sense to collaborate in a catchment-based approach to improving the ecological status of the whole local river system.

The formation of a **River Water Quality Group** with a representative Councillor from each parish council will enable this to happen.

Riparian parish councils have already collaborated in the **River Erme** and **River Yealm** catchments in South Hams to regularly review water quality data produced by community groups working within the catchment as a whole. They meet twice per year. This enables them to have an informed view of the level of pollution caused by South West Water's Combined Sewer Overspills, agricultural pollution and pollution from local industry or roads.

**River Water Quality Groups** can:

- Facilitate their local community groups focussing on water quality by providing funding for monitoring equipment, training, analysis and public awareness events and public engagement activities.
- Raise the profile of river-sensitive lifestyles businesses and catchment-sensitive farming with parishioners.
- Escalate any concerns through the District Council and County Council representatives who attend all normal monthly parish council meetings.
- Request meetings with SWW and farmers to discuss local solutions to pollution.
- Liaise with volunteer groups to assist farmers install Nature-based Solutions to agricultural pollution and mitigate pollution from SWW assets.

**Campaign issue**
HM Government has not yet made water companies **Statutory Consultees** for planning applications even though additional housing will inevitably overload the sewage system and contribute to river pollution.

However, this does not prevent parish and district councils from pro-actively considering the published Hydraulic Capacity of SWW treatment works into consideration when deciding on planning applications.

Councils can request SWW to provide information about

**Councillors can request SWW to provide information about the estimated spare hydraulic capacity and the number of dwellings each treatment work is capable of serving.**

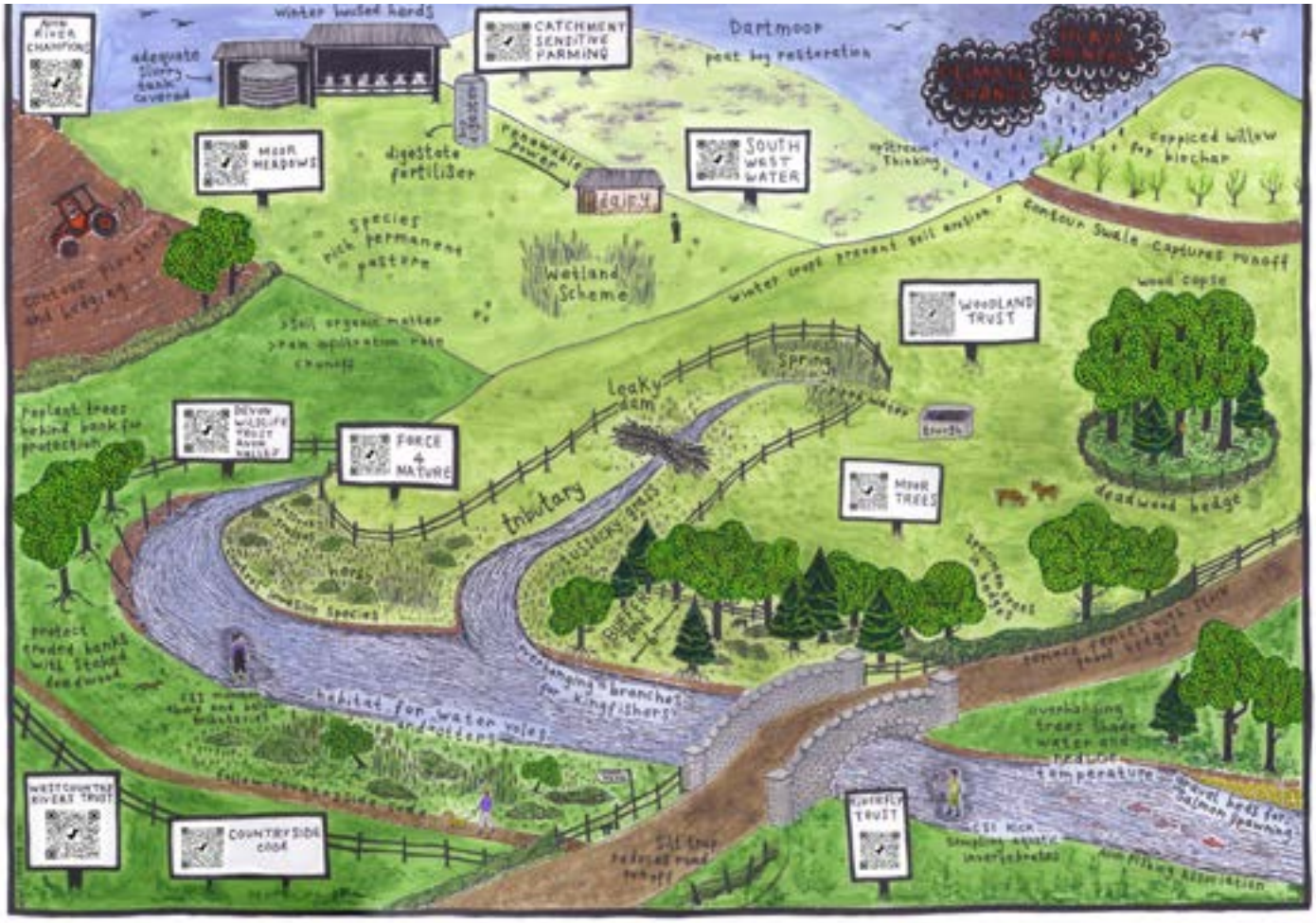
**An estimate from information, readily available to SWW, is sufficient for planning purposes without the need for detailed hydraulic analysis which will cause delays.**

## Sustainable Drainage Systems

**Catchment-sensitive planning decisions** by local government should pay greater attention to Sustainable Drainage systems and could promote the retrofitting of SuDS where local sewage and waste water treatment works are known to be inadequate.

Alarm bells should ring if a proposed new development intends to connect with a combined sewer drainage system that will flow through a SWW treatment works which is already recording unacceptable CSO events.

Closer attention to **Sustainable Drainage Plans** for all planning applications connected to water bodies where the RNAG is due to SWW sewage treatment works having insufficient hydraulic capacity - will ensure drainage plans do not add to pollution.




# **Collaboration** Volunteer Groups

Devon Wildlife Trust, Woodland Trust and Force4Nature offer well-organised opportunities for volunteers to join in physical activities aimed at improving biodiversity and reducing pollution of our rivers.

This is an enjoyable way for communities to work together to solve our local problem. Pioneering farmers are now inviting such groups to work with them to install nature-based solutions to agricultural run off.

This is a critically important community endeavour to design and implement a small local catchment plan and implement it.

Farmers can play a leading role in delivering good ecological health to our rivers. Communities can volunteer and fund raise to show their respect for farming families who are the custodians of our landscape and the key workers who produce the food we eat.

# Collaboration

## Environmental Organisations

The **Catchment Based Approach** (CaBA) was established just over 10 years ago by Defra in order to embed a collaborative approach to land and water management across England.

The South Devon Catchment Partnership includes organisations such as the Environment Agency, Westcountry Rivers Trust, Devon Wildlife Trust, fisheries associations and landowners.

The Catchment Based Approach Partnership (CaBA) has a catchment plan. Over the years they have drawn down funds to address diffuse pollution, point source pollution, protected species like the freshwater pearl mussel, protection of otters, reintroduction of beavers, riparian tree planting, weir removal etc.

CaBA's innovative model is expected to bring local knowledge and expertise to bear, empowering individuals, organisations, and communities to take ownership of local issues and providing the catalyst to implement cost-effective delivery on the ground. Improvements to water quality, reduced flood risk, increased climate resilience, nature recovery and more sustainable businesses are all part of this integrated approach.

This is a high level regional project linking established expert organisations in order to develop landscape scale catchment plans which prioritise certain areas and habitats.



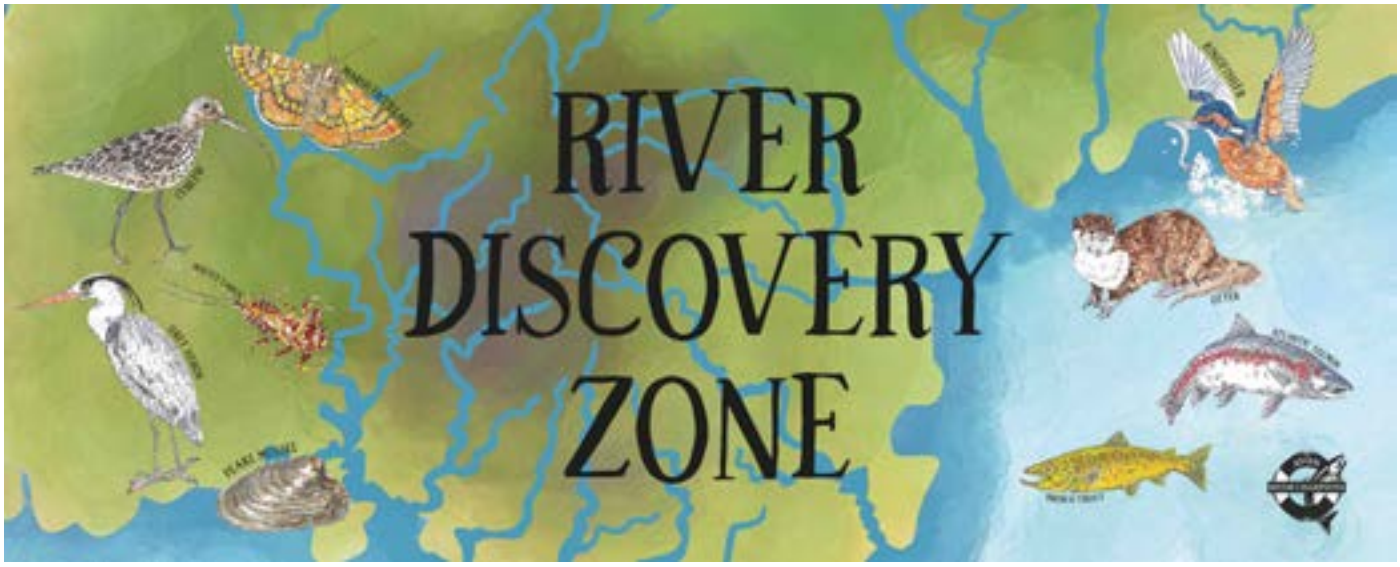
### Catchment Systems Thinking Cooperative CaSTco

This is a partnership pilot programme between **The Rivers Trust** and **United Utilities** providing technical expertise to **9 demonstrator areas** and wider partnership. It aims to **shape CaSTCo's framework and standards** for a more collaborative and integrated approach to how we monitor, use data, and make decisions about our rivers. **The Rivers Trust** also leads The **Big River Watch,** a campaign to inspire people to reconnect with their local river and engage with citizen science

**United Utilities is** co-leading the CaSTCo project. Within the project itself, they're developing a more integrated approach to catchment monitoring **by working closely with Ribble and Mersey Rivers Trusts** and developing a shared understanding of citizen science recruitment at scale and on-going engagement. By sharing learning and development experience through joint training of river rangers and Rivers Trust volunteers, they're also **exploring a process to prioritise sampling locations.**

**Note:**
The CaBa and CaSTco programmes and the proposed Blue Print Projects are complimentary.
**NB: BluePrint Project can begin immediately**

# **Collaboration** Public Engagement




Avon River Champions are organising the next (mini) River Discovery Zone at the **Devon County Show** 15 to 17 May 2025. This will be part of the Ocean Discovery Zone marquee on the main boulevard of the showground

The marquee is being sponsored by the Devon County Show Committee.

The next full River Discovery Zone which will use the whole of the marquee will be in 2026. Champions if you want to exhibit in our marquee

River catchment community groups wanting to promote their projects and share good practice are welcome to contact the organiser:

Louise Wainwright
info@avon-river-champions.org

# Collaboration LOCAL CATCHMENT PLANS

Engagement of all sectors in a very local **Catchment Summit** would provide an opportunity to review the local evidence and collaborate to improve water quality. Below are some suggestions for discussion, but there are many more topics…. What are the other options? What are the priorities? What is affordable? What further evidence is needed? How can this be led and coordinated?

## South West Water

- Develop better **relationships** with small catchment **community groups**, meet to discuss problems and develop a collaborative approach to problem solving.
- Ensures only **treated final effluent** enters our rivers, except in extreme weather conditions.
- Collaborate with local farmers & landowners to finance **Nature Based Solutions** where it is not possible to increase the hydraulic capacity of the sewage and water treatment works.
- Put easily accessible information into the public domain about the **number of household**s which their waste water and sewage treatment works have the hydraulic **capacity to serve** without any dry spill events.
- Makes **Dry Spill Events monitoring** with flow rates (as well as hours of spills) easily available in the public domain.
- Develops an effective communication system with local government **Development Management Committees** to ensure that the risk of increased pollution from the proposed development is recognised and taken into account in the planning process.
- Ensures local government and catchment community groups have easy access to evidence of the extent of pollution arising from their assets and are aware of the **time-line and amount of investment** needed to provide sufficient hydraulic capacity to prevent pollution.
- Provide households with **rainwater catchment tanks** to prevent storm water from roofs swelling the volume of water that creates more CSOs.

## Farmers & landowners

- Talk to **farming neighbours** about what you could do collectively.
- Link up with **local community catchment group** to make a joint plan.
- Prioritise **Nature-Based Solutions** to reduce agricultural pollution of our rivers
- Ensure **nitrate and phosphate fertiliser** applications do not enter our water bodies
- Ensure **pesticide applications** do not enter our water
- Prevent **soil / river bank erosion** and run-off into rivers
- Prevent farm animals having access to tributaries and rivers and provide **alternative water sources.**

## Households and businesses

- Join or form a local **river community group**
- Volunteer to help install local nature based solutions
- Invest in **Sustainable Drainage Solutions** which prevent rainwater from roofs and drains from increasing the volume of water entering combined sewer drain systems
- Ensure sinks and drains are not used for rubbish disposal.
- Only flush **poo, pee and paper** down the loo, ensure wet wipes and cigarette butts go in the bin
- Use **phosphate-free** detergents, shampoos and other beauty products.
- Ensure paints, solvents and other forever chemicals do not enter the drain.

## Local Government

- Ensure SWW is consulted for all planning applications whether or not they are a designated **Statutory Consultee**.
- Take **hydraulic capacity** of treatment works into account on all planning decisions.
- Ensure **Sustainable Drainage Solutions** are applied to all planning applications.
- Identify **funding opportunities.**
- Form I**nter-parish water quality groups** to support local river community group projects
- Ban **wet wipes** in Devon.

**Find the starting point.**
**Make a Plan**
**Fix the problem**

# Evidence
## Regulatory

**Campaign issue:**
Full transparency and fines in relation to the scale of pollution by South West Water requires **volume of CSOs** to also be reported to the public and acted upon by the Environment Agency.

Currently only the hours of CSO spills is published

**Campaign issue:**
Designated Bathing Water (DBW) status does not guarantee improved water quality. It is an intensive water monitoring programme by the EA

To have an impact this additional monitoring must address the inherent failures of the EA to enforce the law and ensure polluters invest in pollution prevention.

Budget cuts to EA have resulted in a smaller team of water monitoring officers. There are concerns that if DBW is prioritised, this will reduce, even further, the EA monitoring programme in rivers that is used to designate 'ecological status'.

EA Rivers data

EA Estuary data

Rivers Trust Sewage Map

Designated Bathing Waters

EA Swimfo

Community groups can identify pollution hotspots in their catchments to prioritise their interventions. The main sources of public information are:

- The Environment Agency's **Catchment Data Explorer** which determines the Ecological Status of our water bodies in rivers within larger **Operational Catchments**:
- The data for Estuary waters are published on the **South West TraC Management Catchment** website.
- The **Rivers Trust Sewage Map** collates data provided by the water companies (which self -report) on the number of combined sewer overspills (CSOs) and the duration in hours. This data d**oes not currently include the volume of the pollution.**

**Operational Catchments**
There are seven EA 'Operational Catchments' of relevance to this review.

- Dart Start Bay and Torbay
- Avon Salcombe and Kingsbridge
- Erme
- Yealm

**Water Bodies**
Each Operational Catchment is divided up into sections called 'water bodies' which are monitored separately by the EA. Each water body has a unique ecological classification.

**Designated Bathing Waters**
There are 26 Designated Bathing Waters in South Hams, where the EA is required to take weekly water samples from May to October and provide sites annually with a Designated Grade based on the worst and best scores for the last four years.
Bantham, Bigbury-on-Sea North, Bigbury-on-Sea South, Blackpool Sands, Bovisand, Challaborough, Coastguards Beach, Erme Estuary, Dartmouth Castle and Sugary Cove, Dittisham, Dart Estuary, Hope Cove, Mill Bay, Mothecombe, Salcombe North Sands, Salcombe South Sands, Slapton Sands Monument, Slapton Sands Torcross, Steamer Quay, Dart Estuary, Stoke Gabriel, Dart Estuary, Thurleston North, Thurleston South, Warfleet Creek, Dart Estuary Wembury

**EA Swimfo** site provides the daily warnings about pollution in a DBW.

# Evidence
# Discharge Permits

Water companies are only allowed to operate legally if they comply with their Discharge Permits which are agreed with the Environment Agency. The legally permitted amount of raw sewage that can be discharged into a river, is limited by a Discharge Permit to **7 milligrams** of **untreated sewage per litre of 'treated' effluent** and this level can only be exceeded twice per year before the water companies are fined.

Inadequate capital investment in treatment works over a prolonged period is the reason why water companies are failing to comply with their legally binding **Discharge Permits** resulting in illegal dry spills of sewage into rivers.

The Discharge Permit defines the **number of households** that each sewage treatment plant is designed to serve. The EA has failed to monitor and update the Discharge Permits even when the EA's own water quality data (RNAG) is given as inadequate **'hydraulic capacity'**(to serve the homes connected to the system).

Farms have **Environment Permits** to undertake agricultural activities. These include a requirement not to pollute rivers.

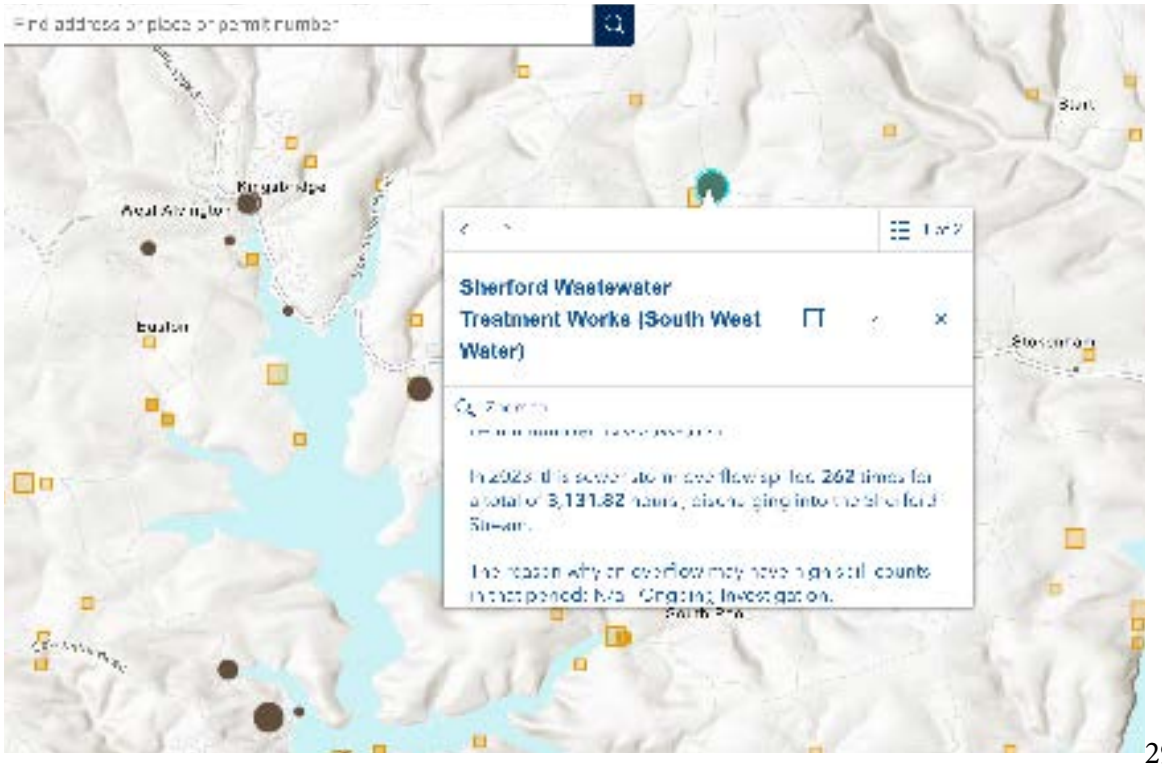
**Campaign issue:**
There are concerns that an over-emphasis by Ofwat on 'keeping customer bills low' may have compromised the ability of SWW to invest in their proposed annual capital expenditure on asset maintenance and asset improvement. Inflation will have increased the capital budgets now needed to remedy this historic failure and will be a significant factor in the expected huge customer bill increases in 2025

Fines are not high enough to influence capital investment priorities of SWW and capital investment is determined and constrained annually by agreement with Ofwat.

**The Enviroment Agency has failed to effectively monitor compliance of water companies with Discharge Permits.**

**This has led to appalling levels of polllution in our rivers**.

**Campaign issue:**
South West Water is currently under investigation by the EA for breaching the requirements of certain Discharge Permits. Fines can be imposed by EA for failure to comply. The 'burden of proof' to support enforcement action is too high to provide thorough oversight.



# Evidence

## Spare hydraulic capacity

**Assessment of capacity at Water Treatment Works serving Stratford-on-Avon District**

Note: This is desktop assessment provided by Severn Trent Water using readily available information and it has not been subjected to detailed hydraulic analysis.

**General comment regarding water treatment capacity:**
Whilst water treatment works may not have sufficient spare capacity to accept the levels of development being proposed in its catchment area this does not necessarily mean that development cannot take place. Under Section 94 of the Water Industry Act 1991, sewerage undertakers have an obligation to provide additional treatment capacity as and when required. Where necessary the undertakers will discuss any discharge consent implications with the Environment Agency.

| Water Treatment Works | Current population equivalent | Current / observed dry weather flow (m3/d) | Current DWF Consent (m3/d) | Estimated headroom based on current quality performance (RAG) | Estimated spare hydraulic capacity | |
|---|---|---|---|---|---|---|
| | | | | | Population equivalent | Dwellings @ 2.4 persons/dwelling |
| Alcester WTW | 8,637 | 2425 | 3150 | Significant | 4,531 | 1,888 |
| Bidford on Avon WTW | 7,760 | 1556 | 1870 | Minimal | 1,963 | 818 |
| Butlers Marston WTW | 640 | 181 | 190 | Limited | 56 | 23 |
| Cherington WTW | 1,458 | 353 | 365 | Significant | 75 | 31 |
| Claverdon WTW | 908 | 216 | 250 | Significant | 213 | 89 |
| Ettington Works WTW | 1,058 | 142 | 460 | Limited | 1,988 | 828 |
| Fenny Compton WTW | 797 | 120 | 251 | Significant | 819 | 341 |
| Gaydon WTW | 390 | 51 | 110 | Limited | 369 | 154 |
| Ilmington WTW | 715 | 147 | 210 | Significant | 394 | 164 |
| Southam Itchen Bank WTW | 15,597 | 2494 | 2881 | Limited | 2,419 | 1,008 |

The above table was prepared by South Trent Water for South Trent District Council to inform the planning department whether individual sewage treatment works had the **spare hydraulic capacity to serve additional additional households**.

This is readily available technical information which is needed by the water companies in order to manage the sewage and waste water treatment networks.

South West Water has been asked by the **SHDC Overview & Scrutiny Committee** to provide this information. It is now a formal Freedom of Information request**,** which has not yet been provided.

District Councils are having to facilitate the building of more affordable housing to meet Government targets. Making consideration of the ability of local sewage works to meet the needs of additional housing without causing further pollution - is simple 'due diligence'.on the part of the **Development Management Committee.**

# **Evidence -** eDNA Analysis

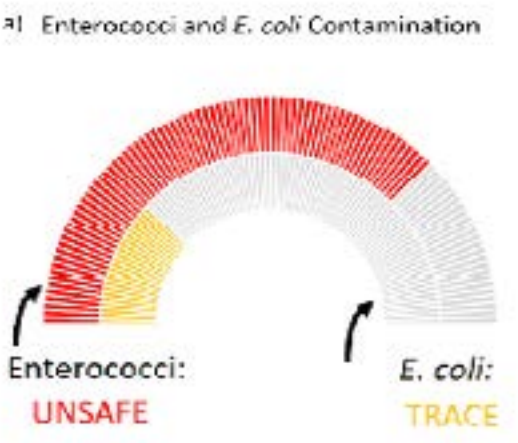
The EA Catchment Explorer data determines the "Reasons for Not Achieving Good" ecological status in our water bodies. A RNAG will state whether Agriculture or SWW is a source of this pollution but it does not quantify the relative importance of these sources, making it less obvious where interventions should be prioritised to solve the problem. The EA classification is also based on information obtained over 6 years and may not reflect the current situation.

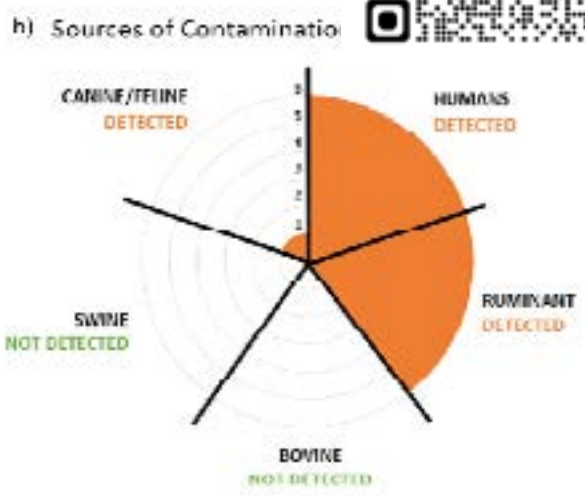
Faecal matter (poo) that enters the river can be from a wide range of animals or from humans. Bacteria present in the faecal matter has a different **DNA fingerprint** depending on which animal it came from. Therefore analysis of bacteria can determine the extent and source of the pollution. Faecal matter not only contains bacteria (which makes human water users ill) but is it also a major source of phosphate pollution which causes algal blooms and removes oxygen, causing fish to die.

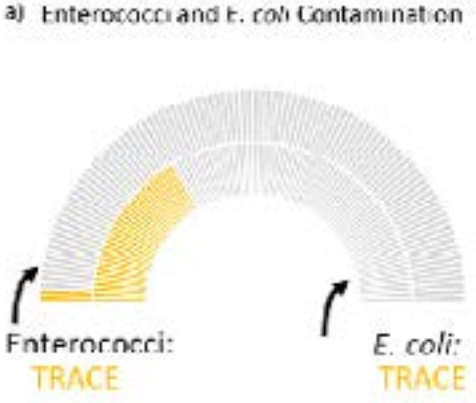
**River Water Quality Groups** would be better informed of the relative importance of agriculture or SWW as a local pollution source by commissioning strategically sited, once-off **e-DNA analyses** of water samples. For example above and below a tributary running off agricultural land where grazing animals are not prevented from entering the water body or above and below a SWW waste water /sewage outlet. A more accurate picture could be obtained by undertaking eDNA analysis during low river flow rates in the summer and high flow rates in the winter

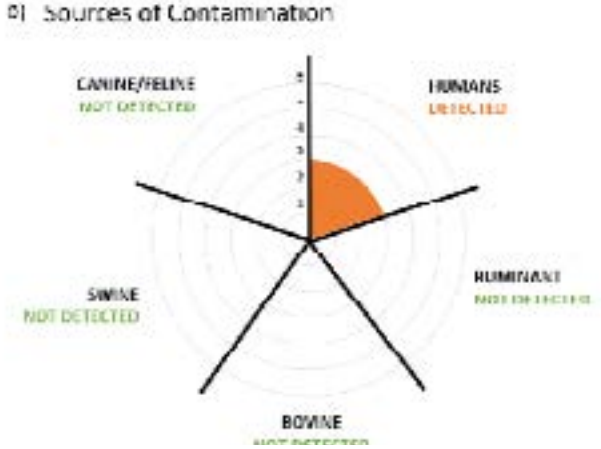
This data could form part of the evidence base for a public consultation on catchment plans for our water bodies - a **BLUEPrint**.

Diagram below: : The (top) e-DNA report indicates that the water company sewage treatment works and a local sheep farmer are equally responsible for unsafe levels of faecal pollution in this water body. **INTERVENTION PRIORITY**
The (bottom) e-DNA report indicates that, whilst only human sewage pollution has occurred, it is not at unsafe levels. **INTERVENTION NOT A PRIORITY**



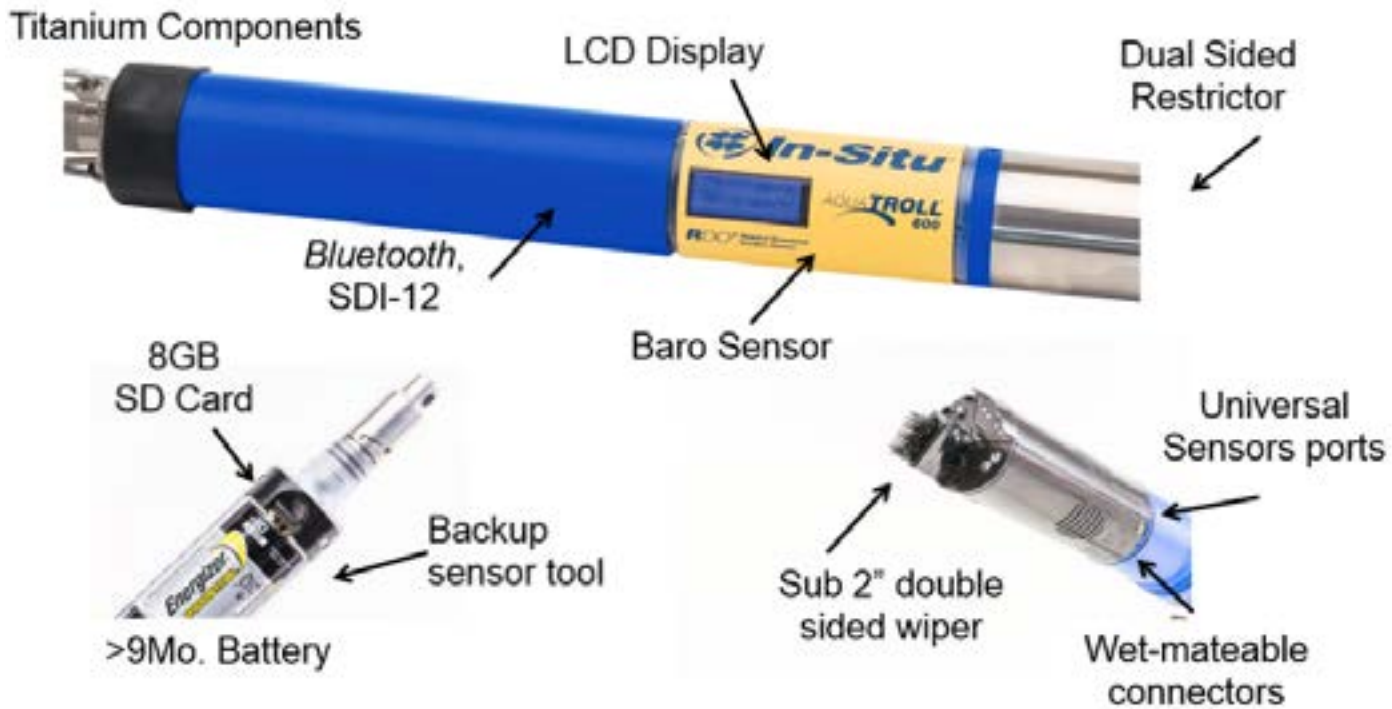



# **Evidence -** Continuous Water Monitoring

Some catchments have formed I**nter-Parish Water Quality Groups** to fund the purchase of real-time water quality monitoring equipment such as the In-Situ sonde. The equipment can support various modules, depending on what parameters need to be recorded. Live alerts will be sent via mobile phone to a rapid response team based in the community.

The Yealm Estuary to Moor catchment group in South Devon has successfully raised funds, through their inter-parish water quality group, to install and manage an Aqua TROLL 600 in the River Yealm.



# **Evidence** - Citizen Science Investigators

Above: Avon River Champions training by Westcountry Rivers Trust - water sampling on the River Avon

## Westcountry Rivers Trust CSI

Local river health campaign groups have engaged catchment communities in their campaigns for water quality by encouraging their involvement in citizen science investigation (CSI) observations.

- Yealm Estuary to Moor
- Wild About the Erme River
- Avon River Champions
- Sustainable Blackawton
- Friends of Salcombe Kingsbridge Estuary
- Friends of the Dart

CSI engages all age groups and encourages 'ownership' of their local water body, making catchment communities more likely to collaborate to develop a catchment plan to restore river health. CSI can provide longer term general observations of trends in biodiversity that is a good indicator of river health.

The WRT have suggested monitoring stations along water bodies, based on the safety and access to the monitoring point and its position in relation to points where tributaries join the main river.

A coordinated CSI programme makes a positive contribution by **creating awareness** of :

- Relative importance of agriculture and SWW as sources of pollution.
- Householders' responsibilities not to flush tampons, condoms, wet wipes and cigarette butts down the toilet or use the drains as a free rubbish disposal system.
- Sources and effect of pollution on aquatic biodiversity (fish, aquatic insects and aquatic flora) and the birds and mammals that rely on them as part of the food web.
- Effect of water temperature, pH and turbidity on aquatic life

**River Guardians**

It is helpful to have a volunteer local person who is a good communicator and possibly a trainer too, to act as a coordinator for citizen scientists in their locality. We call them River Guardians.

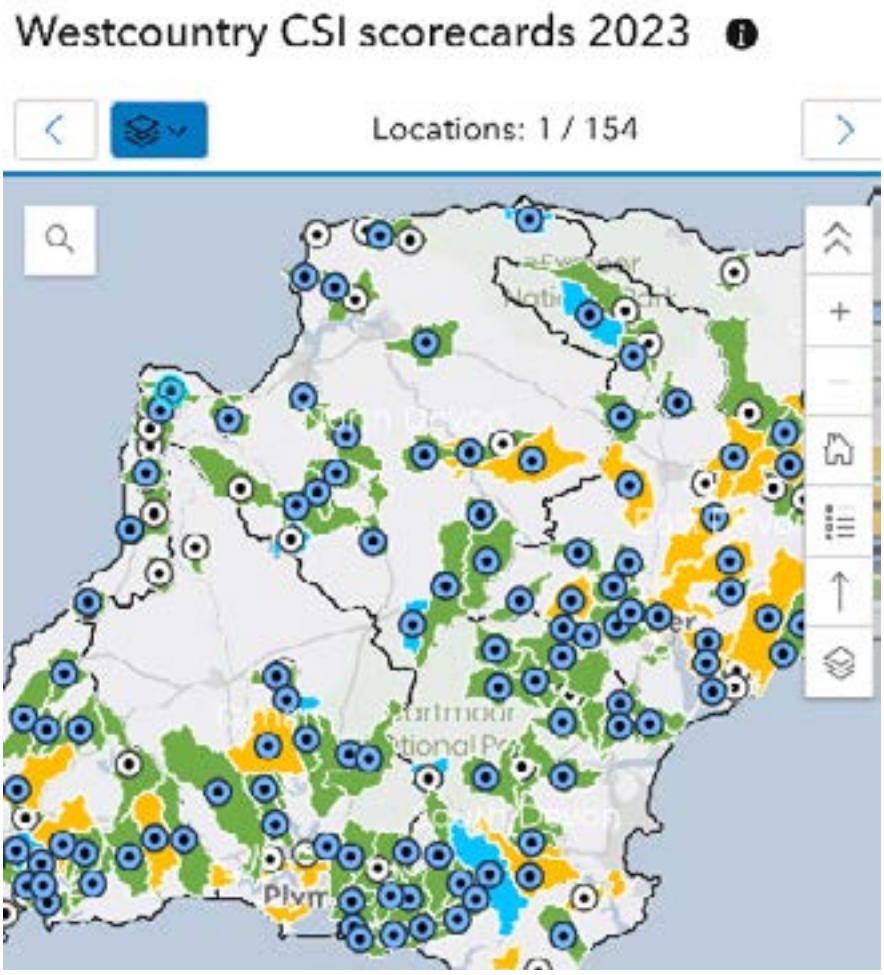
**River Wardens**

Some catchments in Devon employ a River Warden funded by their local **District Council**. River Wardens provide training to CSI, coordinate and undertake sampling, analyse data and present it to the **River Water Quality Groups**

# **Evidence** - CSI River Score Cards


**Westcountry Rivers Trust CSI Score Cards**

If there are at least 12 (monthly) CSI records in a river/ tributary, WRT will analyse the observations and produce a score card (above)




Explore map online and click on dots to view score cards for rivers near you.

# **Evidence** - CSI Kick sampling



## CSI Kick sampling

Aquatic insects in our rivers are an indication of the health of a river.

They can be sampled by collecting water samples after kicking up the riverbed to disturb aquatic insects living and feeding there.

The Riverfly Partnership is a network of organisations, representing anglers, conservationists, entomologists, scientists, water course managers and relevant authorities, working together to: protect the water quality of our rivers.

Sampling kits, training and signing up to monitor riverflies or set up a river group can be found on their website.

# Evidence

## Regulatory

### Reasons for Not Achieving Good (RNAG)

**EA Catchment Explorer** data identifies the RNAG for all water bodies by:

**SOURCE** of pollution by **Sector Responsible**

Agricultural
South West Water
Urban & Transport
Domestic General Public

**ACTIVITY** which has resulted in pollution

- ***Agriculture -***
  **poor nutrient management** - Excess use of inorganic fertiliser on crops/pasture which has run off the land and into the river or application of organic fertilisers such as animal slurry to the land during the winter periods of high rainfall.
  **poor livestock management** - Inadequate fencing of animals to exclude them from a buffer zone along all tributaries or rivers, allowing them to defecate into the water body.
  **Poor soil management** - Failure to prevent soil run off by contour ploughing, contour swales, silt dams, leaky dams or lack of permanent pastures near rivers.
  **Riparian and in-river activities** including bankside erosion

- ***South West Water***
  **sewage discharge** (continuous)
  **sewage discharge** (intermittent)

- ***Private Sewage Treatment***
  **sewage discharge** (continuous)

- ***Septic Tanks***
  **sewage discharge** (continuous)

**Campaign issue:**
The data presented by the EA in the Catchment Explorer for RNAG does **not quantify the scale of the pollution** from each source (e.g. Agriculture or SWW sewage treatment works).

This makes it impossible to have meaningful discussions with the local polluter in order prioritise the interventions needed.

It also makes it impossible to apportion fines in relation to the scale of pollution.

**Campaign issue:**
Privately owned Septic Tanks are not regularly inspected by the EA to ensure that they are fit for purpose and are not overspilling into streams and tributaries.
e.g Septic tanks are one RNAG for Slapton Ley

# Evidence

## Regulatory

### Office of Environmental Protection Report (May 2024)


The compliance of our Government with UK environmental legislation is audited by the Office of Environmental Protection.

Deeply concerning' failures to properly implement regulations designed to protect rivers, lakes and coastal waters in England mean key targets for improvement will be missed, a report by the Office for Environmental Protection (OEP) has found.

As part of its role to monitor how environmental laws are working in practice the OEP has carried out a review of the key legislation regarding water quality - the Water Framework Directive (WFD) Regulations for England - and how they are being implemented by Defra and the Environment Agency through River Basin Management Planning (RBMP).

This report assesses whether the Government's plans to improve England's rivers, lakes and coastal waters are likely to be effective enough to achieve the target to have 77% in Good Ecological Status or Potential by 2027 – the Environmental Objectives it has set in the regulations. These legal targets also play a significant role in the Government achieving its wider environmental ambitions for nature and species recovery.

The report finds that Government and the Environment Agency (EA) are currently not on track to meet the Environmental Objectives. The OEP's worst case assessment would see just 21% of surface waters in Good Ecological state by 2027, representing only a 5% improvement on the current situation.

Dame Glenys Stacey, Chair of the Office for Environmental Protection said: "We have found that, while the relevant law here is broadly sound, it is simply not being implemented effectively. This means it is not delivering as intended and, as a consequence, most of our open water is likely to remain in a poor state in the years ahead unless things change. This is deeply concerning.

# Evidence
# Regulatory

## Water Special Measures Act (Feb 2025)

**Statement from HM Government**

The Water (Special Measures) Act was introduced into Parliament on 4 September 2024 and received Royal Assent on 24 February 2025. The act significantly strengthens the power of the water industry regulators and delivers on the government's commitment to put failing water companies under special measures.

There is a lack of public trust in the industry and widespread concerns about underinvestment in infrastructure, levels of pollution, and failures to address illegal spills of sewage. In 2022 to 2023, £9.7 million was paid out in executive bonuses and benefits to water and sewage company executives in England and Wales, despite poor performance.

This act is not the full extent of the government's ambition, with wider transformative change across the whole water sector to follow. This act delivers on the government's promises by:

- Blocking bonuses for executives who pollute our waterways
- Bringing criminal charges against persistent law breakers
- Enabling automatic and severe penalties for wrongdoing
- Ensuring monitoring of every sewage outlet.

Collectively, the measures in the act will ensure water companies are better held to account where they have failed to deliver for the environment and customers and begin to restore trust in the industry.

To enable the implementation of the new measures introduced by the act, the strengthened regulators will consult on how they intend to use their new powers provided by the act, as well as on updates to their guidance and policies where required. The government and the regulators will take into consideration the overall impacts of the policies introduced through the act and ensure that the ability of the sector to attract investment and any impact on customer bills are carefully considered and balanced.

### Environment, Food and Rural Affairs Committee

Oral evidence: Reforming the water sector, HC 588 Tuesday 25 February 2025

**See Q184** and Susan Davey's answer
Helena Dollimore: You did not take your annual bonus, but you added extra to your pay.

**See Q188** and Susan Davey's answer
Chair: Caroline Voaden, the local Member of Parliament in South Devon, has asked your company repeatedly to carry out a random testing of the domestic supply in homes in Higher Brixham and Kingswear. This comes to the point about customer engagement and restoring confidence. You have refused to do that. Why is that?

**See Q211** and Susan Davey's answer
Tim Roca: Then in January, customers are facing, I think, a **28% increase in bills** over the next period but there was a similar announcement of an **increase in dividend again**. Does that seem fair to you?

**Q206** and Susan Davey's answer
Jenny Riddell-Carpenter:. Ofwat's final determination in the PR24 provided an expenditure allowance of £3.8 billion, which I believe was £94 million less than you had asked for, less than you had hoped for. I appreciate that is £1.5 billion more than the previous PR cycle. How can you achieve your targets? Importantly, what will not be taken forward as a consequence of that slimmed down budget that you asked for?

# Evidence
# Regulatory

## Independent Water Commission - public consultation

**Statement from Independent Water Commission**

The Call for Evidence sets out the areas where the Independent Water Commission is **seeking views** in relation to the water sector in England and Wales.

It outlines the current issues based on the evidence the Commission has gathered so far, and areas for potential change that the Commission wishes to explore.

The task of the Commission is to stand back from the system and explore, with an open mind, potential changes. Its task is to make recommendations on **how to equip and reform the system** to meet the challenges of the future and, crucially, restore over time the trust that has been lost. This Call for Evidence is an essential building block in that process.

**Why your views matter**
Water is essential to society. We rely on it for safe drinking water and sanitation of wastewater. It is also fundamental for public health, the enjoyment of our waters, the natural environment, economic growth and food security.

The evidence sought here will inform the Commission's development of recommendations. The Commission wants to deliver an **ambitious, long-term approach to resetting the water sector**, in a **new partnership** between government, regulators, water companies, customers, investors and all those who enjoy our waters and work to protect our environment.

This Call for Evidence will run for 8 weeks. It opens at midnight on Thursday 27 February 2025 and c**loses on Wednesday 23 April 2025 at midnigh**t.

We strongly encourage you to respond to this Call for Evidence using the online survey below. If you are unable to answer the questions online, please see the Call for Evidence document for details on alternative ways of responding.

**Find out how your MP voted on any motion in Parliament concerned with river health**

# **Evidence**
# Event Duration Monitoring

Water companies are now legally obliged to publish self-monitored data on the hours that they allow CSOs to occur and the time when this happened. This now makes it possible to monitor if the CSO occurred during a high rainfall event or not.

The EDM data is now published on the **Rivers Trust Sewage Map**.

On 18th November 2021 the Environment Agency and OFWAT announced major investigations into potential widespread non-compliance (with Discharge Permits) by water and sewage companies at sewage treatment works.


**Campaign issue**
It is not possible to determine the seriousness of the EDM data (hours of effluent spill) without also referring to the readings on the volume of the flow of effluent associated with each EDM reading.

Water companies must have this information and should be required to publish this.

The combined data would more accurately estimate the pollution caused and influence the levels of fines

# **Evidence-** Combined Sewer Overspills

There are two types of SWW treatment works.

- **Waste water treatment works** - which take water from our sinks, roofs and drains
- **Sewage treatment works** which take what we put down the toilet.

Sometimes these two networks COMBINE to deliver a larger volume of effluent to the South West Water sewage treatment works.

Combined Sewer Overspills **(CSO)** into our rivers occur when SWW allows the higher volume of effluent to spill into the river without treatment.

SWW are permitted to allow CSOs to occur but only under specific conditions of their Discharge Permits. They must only occur during periods of **exceptional wet weather.**

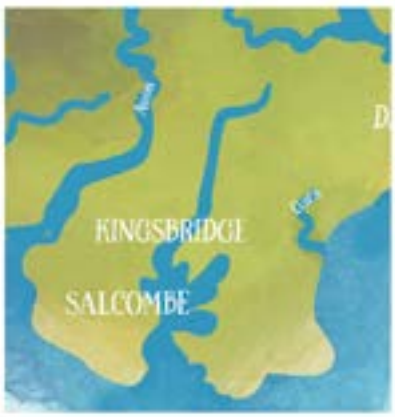
If they did not allow CSOs to occur - the untreated sewage would overspill into our bathrooms.

Water companies are legally obliged to publish self-monitored data on the hours that they allow CSOs to occur and the time when this happened. This now makes it possible to monitor if the CSO occurred during a high rainfall event or not.

## Annual CSO in local Constituencies (2023)


**Rebecca Smith**
**Catchment Constituencies: Rivers Plym, Tavy, Yealm and Erme.**

SOUTH WEST DEVON
CONSERVATIVE
Total of
**2,430** spills
Total duration of
**21,285** hours




**Caroline Voaden**
Catchment Constituencies:
**Avon, Gara, Slapton Ley, Dart, Erme and Kingsbridge Salcombe Estuary**

SOUTH DEVON.
LIBERAL DEMOCRAT
Total of
**5,206** spills
Total duration of
**52,226** hours

**Campaign issue**
There is a lack of transparency about the 'On-going Investigations' and whether a high proportion of the 'on going investigations' are likely to be lack of sufficient 'hydraulic capacity'.

**Campaign issue**
There does not appear to be a time limit on how long 'on-going investigations' can take before a default reason of lack of 'hydraulic capacity' can be assumed and fines allocated accordingly.

**Campaign issue:**

CSOs are a permitted release valve ONLY when they occur during 'exceptionally heavy rainfall'.

But CSOs occur routinely at some treatment works during normal weather because SWW do not have the hydraulic capacity to serve the population connected to it.

The extent of this lack of 'hydraulic capacity' is masked by the huge number of '**on-going investigations**' which do not appear to be a priority or be keenly scrutinised by the EA and Ofwat.

**Campaign issue:**

There is a lack of transparency about reporting on the frequency of DWF for individual treatment works.

Campaigners are concerned that the EA is not able to intervene promptly and enforce action to prevent this happening even when the water company is in breach of Discharge Permits.

# Evidence

## Dry Weather Flows

DWF is the average daily flow to a waste water treatment works (WWTW) during a period without rain. Applications for Discharge Permits must predict the DWF. The Applicant is obliged to update the prediction if the population it serves increases or infiltration increases.

When an operator applies to increase the hours of DWF, the Environment Agency will usually require a number of changes to be made at the treatment works. A water company has three years to comply with requirements.

BBC Investigation

**Campaign issue:**

There is a highly concerning lack of transparency about the number of homes that a sewage treatment works has the capacity to serve, when this is a critical local authority planning issue for new developments.

**All water companies have readily available information, for all their treatment works, about the estimated spare hydraulic capacity and the number of dwellings each is capable of serving.** An estimate could be made available to local authorities without delay because a detailed hydraulic analysis is not needed.

In view of the unacceptable levels of CSOs, it is likely that SWW are collecting **standing charges for sewage treatment when they do not have the capacity to provide this service**.

Why have the EA and Ofwat not acted to prevent this happening?

# Glossary & Abbreviations

**Asset Management Plan (AMP)**
The asset management plan period was introduced as a result of the privatisation of the water industry in England and Wales. The AMP periods are linked to the regular **price reviews** used by the Water Services Regulation Authority (Ofwat) to set the allowable price increase for consumers

**Combined Sewer Overspill** (CSO)
CSOs occur when two drainage systems (for drainage water and sewage water) combine into one pipework system and the larger volume is in excess of the hydraulic capacity of the sewage treatment works. The excess is released, untreated, into the river to avoid it being forced back into the bathroom.

**Citizen Science Investigation** (CSI)
Trained, but unqualified, people taking samples in a prescribed manner to collect observations on a natural parameter (e.g. water quality or presence of flora/fauna etc.).

**Dry Weather Flow** (DWF)
DWF is the average daily flow to a waste water treatment works (WWTW) during a period without rain. Applications for Discharge Permits must predict the DWF.

**Environment Agency** (EA)
The EA is the UK regulatory body which, amongst other things, issues Discharge Permits and monitors the Ecological status of water bodies.

**Ofwat**
The Water Services Regulation Authority, or Ofwat, is the body responsible for economic regulation of the privatised water and sewage industry in England and Wales. Ofwat's main statutory duties include protecting the interests of consumers, securing the long-term resilience of water supply and wastewater systems, and ensuring that companies carry out their functions and are able to finance them

**Price Review** (PR)
The prices which water companies can charge customers is reviewed every 5 years and agreed with **Ofwat.** This is the outcome of the **AMP.**

**Reason for Not Achieving Good** (RNAG)
The EA data on the Ecological status of water bodies must indicate the RNAG Ecological status.

**Sewage Treatment Works** (STW)
These assets will treat sewage from toilets and may also be mixed with other waste water from drains and sinks.

**South West Water** (SWW)
SWW is the water company that provides sewage and waste water treatment servcges and drinking water supplies.

**Site of Special Scientific Interest** (SSSI)
These are protected areas in the UK that are nationally important for their natural features, including plants, animals, geology, and landforms. They are legally protected to safeguard their existence and to protect the country's natural environment from development, pollution, and climate change.

**Waste Water Treatment Works** (WWTW)
These assets treat domestic waste water from sinks and drains making it safe to return to the river.

**Westcountry Rivers Trust** (WRT)
WRT is a charity set up to protect our rivers and promote engagement with the flora and fauna within them.

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