

Proposal to designate Wolvercote Mill Stream as a Bathing Water

1. What is your view on the proposal to designate Wolvercote Mill Stream as a Bathing Water?

The Worshipful Company of Water Conservators, a City of London Livery Company, is pleased to respond to this consultation.

We support the proposal to designate Wolvercote Mill Stream as a Bathing Water in principle but are concerned that a number of issues are addressed before designation is granted.

We do not have sufficient information to comment in detail on the proposal for this specific stretch of water and the implications of its designation.

As acknowledged in the consultation document, we note that it has been used for swimming, paddling, and general fun and enjoyment over recent years. Therefore, it is important that the water quality is monitored against agreed targets on a regular basis and maintained.

Rivers, streams and other waterways are part of our natural heritage and we have a duty to protect and enhance them for current and future generations. It is widely recognised that access to and use of green and blue spaces has significant benefit for our physical and mental health.

2. What reasons or evidence do you have to support your view?

Introduction

The Worshipful Company of Water Conservators is the City Livery Company focussed on the long-term health of our water resources and the broader environment. Our members include senior professionals from water, environmental and related industries and regulators, along with others who share our passion for water and the environment. Our experience and knowledge ranges from the complexities of environmental sciences, through the application of engineering to deliver the goals identified by those sciences, and the subsequent management of the assets created. We are mindful of the impact of any decision relating to the water environment, be it environmental or economic.

Summary

We can make only limited comment on the proposed designation for this specific location but want to respond in the context of wider water conservation issues, water quality and the designation of inland bathing waters. We would be pleased to contribute to and support the development of a consensus view on the priorities and actions required for the achievement of water quality and the designation of bathing waters.

The challenge of the delivery of safe inland bathing water

We recognise that in the past swimming and similar activities in rivers have not been encouraged. This was because of pollution, water quality, and safety risks (drowning, Weil's disease, etc.). There were also potential conflicts with other river users such as anglers and boat users.

Water quality has been impacted, by sewage effluents, and the need to sustain sewer overflows in times of storm or emergency (which can affect river water quality for much longer than the event itself), but also by fertiliser, slurry and pesticide run-offs, livestock farming practices (especially larger stock rearing and poultry units), highway runoff, local authority drainage, and wildlife, particularly birds.

Social attitudes towards swimming in rivers have changed, as exemplified by the report of the Environment Audit Committee 'Water Quality in Rivers', January 2022, which identified the dangers posed to swimmers and other river users from bacteria from sewage pollution.

The cost and resource implications for any site designation have to be taken into account, including the capital and operating costs and balanced with the benefits. Any actions to improve bathing waters will also need to be reconciled against other priorities and actions to improve water quality. The source of funding of any improvements has also to be considered.

Time for an evolution in approaches

We submit that the time has come to take a step forward and recognise formally that bathing is one of the potential uses of rivers, beyond the *ad hoc* designations under the transposed Bathing Water Regulations, but the concerns expressed in the past by all parties still exist and must be addressed as part of the designation processes. The use of rivers for bathing must be integrated into a new approach to river catchment and basin planning. It will require a national consensus as to where the use of rivers for bathing, etc. sits in terms of national water quality priorities and the wider national economic priorities.

River water quality objectives need to be revived to take account of recognised uses of the water, including bathing. The uses of natural stretches of rivers need to be identified and confirmed through public consultation and quality specifications agreed which ensure that all those uses are sustained. It is recognised that the pace of implementation will be influenced by practical and economic factors.

We are concerned about the cost figures that have been quoted for remediating sewerage capacity and eliminating overflows. Targeted interventions are needed for appropriate treatment measures at the most vulnerable combined sewer outfalls.

Remotely enabled smart water quality monitors are emerging which allow real-time tracking of river water quality. Likewise, the development of real time monitoring of sewer flows, levels and capacity offer the potential to minimise or even prevent a significant number of overflows.

The roles and resources of the Environment Agency need to be reviewed and upgraded to monitor and enforce water quality, and meet the increased demands arising from revived river use and quality objectives, including bathing water, which also need to be reflected in the Water Company Plans approved by Ofwat.

Overlap with other strategies

The need to develop a river use strategy must be seen in the context of the sources of pollution and factors affecting water quality. The discharge of sewage from combined sewers can arise because the sewers are at full, or beyond capacity, blockages (due to wet wipes and other materials being flushed down lavatories), due to increased flows from large scale house building programmes and changing flow patterns due to climate change. The lack of appropriate statutory roles of water companies and of the Environment Agency in the planning framework also needs to be considered. It raises the possibility of making Sustainable Urban Drainage Systems mandatory in new build consents. Sewer overflows can be caused by blockages and we have already submitted suggestions to Defra on the need for a strategy to change our national practices on the disposal of used care products in response to the consultation on commonly littered single use plastics, particularly in wet wipes.

Our position statement on sewage borne litter can be found at

<https://www.waterconservators.org/wp-content/uploads/A-HOLISTIC-APPROACH-TO-SOLVING-THE-PROBLEMS-OF-SEWAGE-BORNE-LITTER.pdf>

We would be pleased to work with Defra and other interested parties to help develop an integrated approach to water management.

The Worshipful Company of Water Conservators

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