

WORSHIPFUL COMPANY OF WATER CONSERVATORS

ANSWERS TO THE PRESCRIBED QUESTIONS IN THE CONSULTATION ON THE GOVERNMENT'S STORM OVERFLOWS DISCHARGE REDUCTION PLAN (31 March 2022)

Overall Response

The Company agrees with the ambition to make reduce the impact of storm overflows from sewers but considers that the approaches are overly simplistic and may waste resources in terms of what is needed to provide the right balance of protection and use of environmental waters. The proposals lack the ability to reflect local needs properly. The Company submits that a lot more work is needed before the final targets are set. It also submits that the time has now come when environmental aspirations will be better met by public engagement in delivery as well as setting demands. Much more attention is needed on a wide range of matters which are within the responsibility of government.

The views of the Company are set out in response to each question, but the *Position Statement* provides a wealth of commentary drawn from the experiences of Company members.

Q6 Do you agree or disagree with the level of ambition of the ecology target? [neutral]

The Company agrees that setting targets must ensure that the uses of rivers and abundant biodiversity and costs are kept in balance. The Company is not convinced that carrying on the current system of quality classification is fit for purpose and in the accompanying Position Statement sets out some suggestions for an alternative strategic approach and suggests that a review is needed currently

Q7 Do you agree or disagree with the level of ambition of the public health in designated bathing waters target? [strongly disagree]

The Company recognises that social demands for inland bathing waters have evolved and the Country needs to determine how past cautions can be better addressed to meet these demands. A Plan for dealing with sewer overflows does not seem the right vehicle to deal with this as this as the issues are much broader than just the impact of such overflows. If more inland bathing waters are designated in any kind of controlled water, then this will mean more than just increased monitoring and notification processes. The Company advocates strongly in its *Position Statement* that a distinct and discrete strategy is needed urgently to replace the rather current random approach to designation. This would fit in as a subset of the overarching river management strategy. A Framework and Road Map is needed urgently.

Q8 Do you agree or disagree with the level of ambition of the rainfall target? [disagree]

The Company recognises that action is needed to reduce the impact of storm sewage overflows. But the approach outlined is overly simplistic and needs to be refined to be more appropriate on a local basis. The Company advocates a revision of the current overflow criteria which have their origins in a 1970 Report.

Q9 Do you agree that this package of targets as a whole addresses the key issues associated with Storm Overflows? [strongly disagree]

The proposals sit in isolation without proper reference to all of the contingent issues ranging from the impact of current planning practices, through the practicalities of delivering and then operating a significant increase in public surface water sewerage. These issues are set out in detail in the *Position Statement*. The Consultation Document does not demonstrate how this Plan will fit in with all the other plans for water management. It does not demonstrate that the time has come to recognise that the delivery of the overall aspirations cannot be delivered by water companies alone.

Q10 [if not] Can you explain why you do not agree?

The range of views of the Company is set out in response to each question, but the *Position Statement* provides a wealth of commentary drawn from the experiences of Company members.

Q11 Would you be willing to pay more in your monthly water bill in order for water companies to tackle sewage discharges as outlined in the consultation [N/A]

10 May 2022

Peter Hall
Master
The Worshipful Company of Water Conservators
peterbhall@hotmail.com