

**To Defra Water Industry Team**

**WORSHIPFUL COMPANY OF WATER CONSERVATORS  
RESPONSE TO THE DEFRA CONSULTATION ON THE PROPOSED STORM  
OVERFLOW REDUCTION PLAN**

This is a Statement by The Worshipful Company of Water Conservators , which welcomes the opportunity to make a contribution on this important issue.

It is a 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.

It submits a Position Paper and answers to the prescribed questions

The Company supports changes in storm water management to protect and enhance the environment and better meet public expectations while also responding to other factors including pressures arising from climate change and the need for more homes. It is also mindful that this is an additional cost to sewerage service customers at a time of economic hardship.

The Company is advocating the following.

- There is a need for a ‘road map’ explaining the relationships of all the water management initiatives. At the moment they appear more like disconnected jigsaw pieces with no overall picture. The Reduction Plan must be integrated with other initiatives and policies.
- An overarching River Use and Quality Strategy is required to provide a holistic framework into which the Reduction Plan will fit .This should evolve from existing Basin and Catchment Plans.
- A more refined approach to setting operational and investment targets
- There needs to be better cost benefit appraisal
- The designation of bathing waters should be part of this strategy but also needs to be part of a separate wider consultation. There is a danger that expectations are raised which cannot be delivered in practice. Storm overflows are a major, but not the sole factor in healthy bathing waters which can be impacted by treated sewage effluents and sundry natural sources .
- In these contexts , the Plan fails to identify actions which the government itself must take beyond setting targets for water companies , for example , in taking such steps as leading behavioural change in society, making sure that legislation and guidance on matters such as planning and development, streetworks , charging for water services, are fit for purpose.

- The achievement of environmental aspirations requires a broader coalition of delivery involving all of us, be that individual or corporate. The Company would like to see the government take national leadership in this concept. The delivery team has to have more than just Water Companies ..
- The Company suggests that the time has come to create a nexus between Citizen Science and Citizen Delivery and it will be considering how this could be best achieved. This is explored in more detail in the body of the Statement

The Company recognises it may be too late to change the nature of the Reduction Plan itself, but notes that it appears overly simplistic, and the Company recommends that there must be more sophistication and refinement of targets.

This Statement underpins the responses to the prescribed questions in the Consultation Document .

The Company stands ready to help .