

WORSHIPFUL COMPANY OF WATER CONSERVATORS

AN INTIAL BRIEFING NOTE SUBMITTED TO THE INDEPENDENT COMMISSION INTO THE WATER SECTOR AND ITS REGULATION

NOVEMBER 2024

1 The Worshipful Company of Water Conservators (WCWC) is a City of London Livery Company focussed on the long-term health of our water resources and the broader related industries and regulators, along with others who share our concern 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. The WCWC's purpose is *promoting a diverse and sustainable environment*.

2 The WCWC is making this early intervention on the work of the Independent Commission under Sir John Conliffe as a natural evolution of its contribution to national strategies and tactics on water conservation. The WCWC has made numerous contributions to consultations and produced think pieces, some at the behest of Defra. These are archived on its website under Policy Positions.

<https://waterconservators.org/policies-and-practices/>

3 The WCWC has active and retired members with a wide network of contacts and experience in all aspects of water management in the UK right up to the highest levels. Its experience stretches back to pre-regionalisation (1974) and pre-privatisation (1989) of service delivery. The WCWC has never sought to defend or accuse any party involved in water management, while it has used the breadth and depth of the experience and knowledge of its members to review and identify, where it considers that suggestions might be of some value. All of this is done *pro bono* and its advice has been taken in some circumstances and not pursued in others.

4 The most important aspect is that our contribution and, indeed, the national debate on the future of water must be based on hard evidence and facts and not in the hyperbole of media campaigns. Even without the current debates, the WCWC has long held a view that after 35 years of execution of the current system, the time is right to take stock and learn from what has gone well and what has not.

5 The WCWC has been advocating the establishment of a Water Commission for some time. Our concept was for a Commission to look at the development of an overall strategy for water management in England and Wales to address the broad spectrum of what the country might expect from how its water environment might be used and conserved. This will also be very important to understand in relation to the role of water in the national drive for growth and new housing, which would derive clarity about how these expectations might be delivered by the water services sector, industry, agriculture, highway management and so on.

6 It is anticipated that the terms of reference for the Commission will address the delivery of effective and efficient water services. The WCWC suggests that that in doing so it will be necessary to create an overall framework, which would be as valid for the other sectors, as it is for water companies.

7 The WCWC produced an overview of its contributions since early 2022. In September 2024, there was a major consultation on the revision of the National Planning Policy Framework and the Overview and consultation response are both located on the WCWC website:

<https://waterconservators.org/consultation-responses/>

8 The WCWC drew attention in the Planning response to time scales; Ofwat's 2024 Periodic Review (PR24), setting the prices and spending limits for 2025-30 is expected to be finalised in December 2024, the PR29 process is likely to start circa December 2025. The Commission will report in 2025, and this may well result in organisational and regulatory changes. While the most likely impact of the Water Commission is going to be on PR29, there is an appetite to do something tangible in this Parliament (2024-29). In parallel there are further plans for changes to planning and infrastructure delivery which may well have an impact. There is also the progress of the current Water (Special Measures) Bill to consider.

9 One of the consistent and persistent suggestions by the WCWC has been for more joined up government. There are several government departments and arms-length bodies involved, including the Ministry of Housing, Communities and Government (MHCG), Department for Business and Trade (DBT), and Defra (including the Environment Agency and the Drinking Water Inspectorate) and Natural Resources Wales. It remains to be seen how this joined up approach accords with the work of the Water Commission. One of the suggestions by the WCWC has been for a multi-agency delivery task force on the water programme, which would involve MHCG, in a manner somewhat similar to the New Towns Task Force. This could embrace the concept of 'tandem working' between MHCG and Defra and of the closer working of the DBT and Defra, as advocated by the WCWC and by the Government on growth.

10 There is a nexus of planning, housing, growth, PR24 which sit alongside to the work of the Commission. The WCWC suggests that sorting out this roadmap will be of great benefit to all parties.

11 There is much to discuss and the WCWC re-iterates that it would be pleased to continue to share its strategic and practical wisdom. To provide a colloquial analogy on this complexity that whilst clarity is essential from the 'Captains on the bridges of these ships', there are 'engine rooms of buttons and levers down below', which need to be addressed to deliver aspirations for growth and a cleaner water environment. In the 'decks' of both the planning and the water management 'ships', there is a plethora of guidance and regulation which need changing, in tandem. For example, determining the role of environmental designations and updating the Building and Water Fittings Regulations as three of the many buttons to push. The WCWC observes that, it is all very well adjusting the Framework, yet there is an 'air of putting the cart before the horse' in these proposals, for example, in that there is no provision made for these practical changes. The breadth and depth of the WCWC offers a unique opportunity to understand how the 'decks' work together in practice.

12 The WCWC affirms its readiness to make its experience and knowledge available to the Commission.