

WORSHIPFUL COMPANY OF WATER CONSERVATORS

RESPONSE TO THE DEFRA CONSULTATION ON EXEMPTIONS REFORM TO ENVIRONMENTAL PERMITTING

JUNE 2025

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 environment. Our members include senior professionals from water, environmental and 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 As part of that purpose, the WCWC has been responding to relevant consultations particularly on matters relating to water conservation. These are archived on its website over the last three years.

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

PROLOGUE

3 Defra is consulting on Exemptions Reform to the Environmental Permitting (England and Wales) Regulations 2016:

[20250408_ConDoc_EPRExemptionsReform.pdf](#)

Defra states that this consultation forms part of the UK government's regulating for growth programme. We are committed to improving regulation to ensure we are protecting the environment whilst supporting economic growth by reducing the burden of regulation. The changes we are proposing would make the permitting regime more agile in managing environmental risk and provide greater business certainty and transparency.

RESPONSE

4 The WCWC supports any initiative to make the delivery of regulation more streamlined, effective and efficient.

5 The questions are answered in word format as the Citizen Space facility was not responding.

ANSWERS

Q1. Would you like your response to be confidential? **No**

Q2. Your name: **Dr Peter Matthews**

Q3. Your email address: **slepeymatthews@gmail.com**

Q4. Which of the options below best describes you? **Non-governmental organisation**

Q5. If you are responding on behalf of a business/organisation, what is its name? **The Worshipful Company of Water Conservators**

Q6. If responding on behalf of a business/organisation, what is the average number of staff members: 50-499 volunteer members, 1 staff member

Q7 Where are you located? If answering on behalf of a business/organisation that is nationally spread, please select most appropriate location, such as that of the head office and/or main area of activity: London

Q8. Do you, or the business/organisation you are responding on behalf of, operate any regulated facilities under the Environmental Permitting (England and Wales) Regulations 2016, or waste controlling and transporting activities (which could become regulated under our separate plans as part of any reforms to the waste carrier, broker and dealer registration system in England)? No

Q9. Do you, or the business/organisation you are responding on behalf of, operate any exempt facilities (i.e. those that do not require a permit while generic conditions still apply) under the Environmental Permitting (England and Wales) Regulations 2016? No

Q10. Do you operate or have an interest in any of the following classes of regulated facilities which are in scope for our proposals? Water discharge activities Groundwater activities Flood risk activities Waste operations Waste controlling and transporting activities: No

Q11. Do you agree that lead regulators should be given these new powers? Yes

Q12. Do you agree that these powers should apply to flood risk activities? Yes

Q13. Do you agree that these powers should apply to waste operations? Yes

Q14. Do you agree that these powers should apply to water discharges? Yes

Q15. Do you agree that these powers should apply to groundwater activities? Yes

Q16. Do you agree that, in England only, these powers should apply to the waste controlling and transporting activities if introduced to the regulations? Yes

Q17. Should these powers apply to any other class of facilities? No comment

Q18. Do you agree that these powers should be given to the Environment Agency in relation to facilities in England? Yes

Q19. Do you agree that these powers should be given to Natural Resources Wales in relation to facilities in Wales? Yes

Q20. Do you agree that regulators making use of these powers should only do so if they do not contravene any of the applicable objectives and criteria? Yes

Q21. What other objectives should apply? No comment

Q22. Do you agree that these powers should only be available to exempt a type of facility from the need to hold a permit to operate if that activity is assessed as low risk? Yes

Q23. How should the level of risk be defined? Details: Thresholds to be determined through low / medium / high / bespoke categories, determined by an open and transparent common framework for environmental impact assessment.

Q24. Do you agree that regulators should only be able to use these powers after they have undertaken a public consultation and published a response to it? **Yes**

Q25. When this power is used to exempt facilities from permitting requirements, should a limit apply on the number or total scale of facilities on a single site without a permit? **No but it depends on the nature of the site**

Q26. How should such a limit be set for flood risk activities? **As per established processes for planning applications**

Q27. How should such a limit be set for waste operations (beyond the existing plans that the total amount of each waste type at a site should not exceed the lowest limit in the exemptions registered)? Details: **No comment**

Q28. How should such a limit be set for water discharge activities? Details: **No impact of water uses**

Q29. How should such a limit be set for groundwater activities? Details: **No impact on water uses**

Q30. How should such a limit be set for waste controlling and transporting activities? Details: **No comment**

Q31. Do you have any further comments on how such limits would be set? **Thresholds to be determined through low / medium / high / bespoke categories, determined by an open and transparent common framework for environmental impact assessment.**

Q32. Should any other safeguards apply to the use of these powers? If answering yes, please provide details if possible. **No comment**

Q33. Do you think these powers will impose any additional costs or burdens on yourself or your organisation? Please provide details if possible. **No, but there should be an understanding of the cost to the permit holder and regulator using agreed impact methodologies**

Q34. Do you think these powers could result in harm to the environment or human health? Please provide details if possible. **No**

Q35. Do you think these powers will result in any benefits to yourself or your organisation? Please provide details if possible. **No**

Q36. Do you think these powers could result in additional benefits to the environment or human health? Please provide details if possible. **Should be neutral; this is about the effectiveness and delivery of regulation**

Q37. Do you have any evidence that would support the calculation of costs or benefits resulting from the proposal? Please provide details if possible. **There was a very big saving when the requirements for the Environment Act s82 monitoring of sewage effluents was exempted from small sewage treatment works with General Binding Rules permits**

Q38. Do you have any further comments on our proposals? Details: **As far as water discharges are concerned, absolute clarity is needed on the definition of compliance irrespective of the nature of the permit**

Q39. Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it. **Very dissatisfied; it was not responding when a submission was attempted on 28 May 2025**