

WORSHIPFUL COMPANY OF WATER CONSERVATORS

RESPONSE TO THE DEFRA CONSULTATION ON THE PERMITTING OF SMALL SEWAGE DISCHARGES

OCTOBER 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 There is widespread acceptance that regulation must be effective and efficient and that its administrative practice must not be an impediment to environmental successes. Streamlining must not compromise the intended output. This is the driver for smart regulation, particularly in matters related to environmental conservation,

4 Defra is consulting on a further update on the permitting of small sewage discharges.

<https://www.gov.uk/government/consultations/environmental-permitting-standard-rules-consultation-32>

5 This provides further distinction between Bespoke and Standard Rules Permitting for such discharges and fits into a broader framework not only for water but for emissions in general into the environment. Defra is consulting separately on part of that broader perspective for industrial emissions to which the WCWC has responded, and this provides a context for this submission.

6 Permits are granted for all activities under the Regulations from 2016, the

Environmental Permitting (England and Wales) Regulations 2016 (EPRs),

Environmental permitting: Core guidance

7 A Standard Rules Permit is a predefined permit issued by the Environment Agency or Natural Resources Wales, covering common waste management

activities with standardised conditions. These Rules were introduced in 2014 the latest version being dated 2025. These Permits are designed for operations that fall within certain parameters. *Making them typically faster and more cost-effective to obtain than bespoke permits. If your activities align with the criteria of a Standard Rules Permit, this option can streamline the permitting process. Allowing you to start or continue operations without unnecessary delays.*

1. Anaerobic digestion including use of the resultant gas and storing digestate
2. Car and vehicle dismantling
3. Car and vehicle dismantling - unavailable for new applications
4. Composting, sewage or sludge treatment, biogas
5. Composting, sewage or sludge treatment, biogas - unavailable for new applications
6. Deposit for recovery
7. Deposit for recovery - unavailable for new applications
8. Electrical insulating oil storage
9. Flood risk activities
10. Medium combustion plant and specified generators
11. Metal recycling, scrap metal and WEEE - not cars or vehicles
12. Metal recycling, scrap metal and WEEE - not cars or vehicles - unavailable for new applications
13. Mining, oil and gas
14. Mobile plant for land-spreading or treatment
15. Radioactive substances for non-nuclear sites
16. Research and development
17. Storage or treatment of waste - recycling, dredging, clinical, soil, tyre shred or wood treatment
18. Storage or treatment of waste - recycling, dredging, clinical, soil or wood treatment - unavailable for new applications
19. Waste transfer station or amenity site with or without treatment
20. Water discharges

8 However, the approach to the 'non bespoke' permitting of water discharges is quite complicated. The 'standard approach' is split between 'Standard' non permitted General Binding Rules and permitted Standard Rules for prescribed small sewage discharges and these terms can get confused. In effect the General Binding Rules are in themselves a Standard Rule. And thereafter that, somewhat larger works must have a Standard Rules Permit and still larger works must have a Bespoke Permit.

Small sewage discharges in England: the general binding rules – GOV.UK
<https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>

LIT 8381 Standard rules SR2010No3 – discharge to surface water: secondary treated domestic sewage with a maximum daily volume between 5 and 20 cubic metres per day

9 The Consultation itself is not as clear as it could be in this hierarchy of distinction. It seeks to alter the boundary between Bespoke and Standard Rules Permitting for defined conditions

Standard Rules Consultation No 32 - Proposed Standard Rules Permits for
Small Sewage Discharges - Environment Agency - Citizen Space

SUMMARY

10 The WCWC supports the proposals with a caveat. It does not offer any detailed comment on them. But it does urge very strongly Defra to take a closer look at the often confusing and complex context behind the specific proposals.

11 In the response to the Defra Consultation on the permitting of industrial emissions, It offered some thoughts as 'starters for ten' on what a more integrated 'customer focussed' framework could look like. The WCWC suggests a hierarchy of Guidance is needed. In fact, any review must start with bringing together all aspects starting with the relevant Regulatory Position Statement. [Response](#) to Defra on the permitting of emissions . Water conservation was used as an example.

Review 2016 EP Regulation



New EPR Guidance
Include General Guidance on Standard Rules etc.
Hyperlinks to list of specific Sector Guidance



Specific Sector Guidance
Hyperlinks to individual Regulations and very specific Guidance

12 The WCWC offered some aspects of water conservation to demonstrate the suggestion but recognises that not even these are a comprehensive list but are given by way of example. It is sure that if this suggestion is progressed there will be much debate! This provides a strong context for this response.

13 The WCWC restates its suggestion to create a new Water Regulatory Position Statement into which these proposals would be integrated in due course.

RESPONSE TO THE CONSULTATION

14 The WCWC, therefore, supports the proposals in this Consultation, pro-tem with the caveat that a more holistic approach to water permitting is needed. Starting, in effect, with an integrated Regulatory Position Statement.

15 The opening could be hyperlinked reference to all regulations concerning the requirements for the management of controlled water which impact on the issue of

discharge Permits and abstraction. This might be reference to any future water strategy and to regulations concerning the management of river basins as per the 2017 Water Framework Directive Regulations or whatever emerges from the implementation of the Cunliffe Commission recommendations. This could then lead on neatly in further hyperlink hierarchies to specific regulations such as those concerning bathing waters and nutrients.

<https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits>

For example, the context of catchment management in the Thinkpiece for Defra on catchments in July 2024, and in particular the example of bathing waters, Response to Defra consultation December 2024, and on nutrients in controlled waters, Response to Ministry of Housing, Communities and Local Government and Defra consultation on nature recovery January 2025.

16 Hyperlink specific regulations and legal commitments, such as the 1994 Urban Wastewater Treatment Regulations, the Storm Overflow Reduction: Plan, monitoring and reporting.

<https://www.gov.uk/government/publications/waste-water-treatment-works-treatment-monitoring-and-compliance-limits/waste-water-treatment-works-treatment-monitoring-and-compliance-limits>

<https://www.legislation.gov.uk/ukxi/1994/2841/contents>

[https://assets.publishing.service.gov.uk/media/6537e1c55e47a50014989910/Expanded Storm Overflows Discharge Reduction Plan.pdf](https://assets.publishing.service.gov.uk/media/6537e1c55e47a50014989910/Expanded_Storm_Overflows_Discharge_Reduction_Plan.pdf)

<https://www.gov.uk/government/publications/water-companies-operator-self-monitoring-osm-environmental-permits>

17 Standard Rules are already applied to several biowaste activities and the EA is seeking an extension to embrace several examples of bioresource management including the use of biosolids in agriculture. And the WCWC has urged Defra to take a more integrated holistic view of the way forward Thinkpiece of September 2025 on bioresources.

18 It would seem reasonable to include specific regulations concerning the control of trade effluent discharged to sewer.