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## Worshipful Company of Water Conservators

*Promoting a diverse and sustainable environment*

**19<sup>th</sup> JANUARY 2026**

### **PLAN FOR THE FUTURE, LEARN FROM THE PAST, ACT NOW**

#### **Third Overview of Consultation Contributions and Think Pieces**

*Focused on 2025 to inform the national dialogue on the future of water management*

#### **PREFACE AND SUMMARY**

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

Because it is of an opinion that its experience and knowledge can assist the national debate on strategy and tactics, it has responded to numerous Consultations and Calls for Evidence on water conservation since early 2022; and produced an Overview of its work in August 2024, which was updated in January 2025. These submissions have been supplemented by Thinkpieces, all of which are archived on the WCWC website

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

The previous Overviews set out some of the thinking behind the evidence-based approach used by the Company. In view of the impending White Paper on the future of water management, it has decided to highlight some of its thinking throughout 2025. This Overview pulls together a compendium of contributions and highlights some of the consistent messages and key points which might be of value. Its purpose is that it will act as 'one stop shop reference' for all the work completed in 2025, which the WCWC intends will be of value in coping with the inevitable debates in 2026. It is also producing a shorter 'quick read' briefing which is also archived on the WCWC website.

The expertise of the members of the WCWC is focussed more on the detail of water service delivery than on agriculture, but the regulatory experiences embrace all aspects.

<https://waterconservators.org/wp-content/uploads/filr/2873/AUG-24-OVERVIEW-OF-WORK-2022-MID-2024.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3225/Jan-25-THINKPIECE-Overview-of-work-as-of-Jan25-.pdf>

The WCWC is moving forward with modern technology and used AI assistance to create a reader friendly Summary.

This Overview Compendium sets out the messages submitted by the WCWC in 2025 ,but it recognises the role of a 'quick read' The WCWC is moving forward with modern technology and used AI assistance to create a reader friendly Summary.

## SUMMARY OF THE WCWC OVERVIEW OF CONTRIBUTIONS AND KEY MESSAGES FROM 2025

### Purpose

The Worshipful Company of Water Conservators (WCWC) provides expert, evidence-based input on water management, regulation, and environmental protection. This document consolidates their key messages from 2025 to inform debate ahead of the Government's Water White Paper.

### Context

- Water management is a **complex, interconnected system**, not a set of isolated decisions.
- Public debate in 2025 was dominated by rising bills, climate pressures, environmental concerns, and governance failures.
- Oversimplified narratives have distorted understanding and hindered effective policy.
- An **overarching water strategy for England and Wales is missing**, leading to fragmented initiatives and inconsistent regulation.

### Strategic messages

#### S1. Strategy Before Governance

Structural reform is pointless without a clear national strategy. All actors need a shared framework of objectives and responsibilities.

#### S2. Government Responsibilities

Many causes of non-compliance lie **outside water company control**, including:

- Highway drainage
- Sustainable drainage systems (SuDS)
- Product regulation
- Emerging pollutants

Government inaction in these areas has undermined sector performance.

### **S3. Communication and Public Understanding**

National communication is fragmented. Issues like water efficiency, waste disposal, and pollution sources require **coordinated national leadership**, not company-by-company messaging.

#### **Key developments in 2025**

##### **S4.1 Tougher Regulation**

The Water (Special Measures) Act 2025 introduced harsher penalties and lower thresholds for enforcement. WCWC warns that vague definitions risk legal challenges and misdirected investment.

##### **S4.2 Independent Water Commission**

The Commission highlighted strategic fragmentation. WCWC broadly supports its direction but awaits the Government's White Paper.

##### **S4.3 PR24 Price Review**

Major investment for 2025–2030 will drive significant bill increases, raising affordability concerns.

##### **S4.4 Growth and New Homes**

Plans for 1.5 million new homes intensify pressure on water resources and drainage. Infrastructure delivery lags far behind development.

##### **S4.5 Climate Impacts**

A dry summer and hosepipe bans underscored the urgency of resilience and climate-adaptive planning.

#### **Some key contributions**

### **S5 Regulation and Compliance Issues**

#### **S5.1 Permits and Non-Compliance**

Definitions are inconsistent and poorly understood. WCWC stresses that compliance must reflect:

- Permit type
- Monitoring regime
- External factors beyond operator control

#### **S5.2 Penalties and Metrics**

Storm overflow penalties risk spilling over into unrelated areas like bioresources. WCWC argues for **simple, enforceable metrics**, not complex scoring systems.

### **S5.3 Monitoring**

Confusion persists between environmental monitoring and compliance monitoring. WCWC supports strengthened, independently audited operator monitoring.

### **S6 Storm and Emergency Overflows**

S6.1 Performance is shaped by planning, drainage, behaviour, and climate. Key issues remain unresolved:

- Delayed SuDS implementation
- Automatic sewer connection rights
- Poor waste disposal behaviour
- Lack of clarity on emergency events

S6.2 Infrastructure investment alone cannot solve these problems.

### **S7 Catchments and Planning**

Catchments must remain the foundation of water management. New Environmental Delivery Plans risk fragmentation unless fully integrated with catchment-based planning.

### **S8 Forever Substances: PFAS and Microplastics**

#### **S8.1 PFAS**

A long-term, persistent pollutant. Water companies face disproportionate criticism for a problem driven by product use. WCWC calls for:

- Faster restrictions
- National strategy integration
- Better modelling
- Polluter-pays enforcement

#### **S8.2 Microplastics**

Wastewater removal risks transferring pollution to land via biosolids. Voluntary measures have failed; mandatory product standards are needed.

### **S9 Bioresources**

Land application of treated biosolids remains the primary, beneficial route. Public confidence has been damaged by misinformation. Any transition must be gradual, with a mixed-economy approach and clear regulation.

### **S10 Water Resources, Efficiency, and Homes**

#### **S10.1 Water Resources and Growth**

Water availability will increasingly shape economic development.

#### **S10.2 Water Efficiency**

Regulation is fragmented. Building Regulations should align with Ofwat incentives. Retrofitting existing homes is a major untapped opportunity.

### **S10.3 New Homes**

WCWC proposes differentiated standards based on local water stress, flood risk, and catchment sensitivity.

### **S10.4 Charges and Affordability**

Tariff reform can support efficiency but must protect vulnerable customers. Lessons from the energy sector are valuable.

## **S11 Conclusions**

WCWC's 2025 contributions reinforce that:

- An **overarching water strategy for England and Wales** is urgently needed.
- Strategy must come **before governance reform**.
- Water management is a **shared societal responsibility**.
- **Catchments** must remain central to planning.
- Regulation must be **coherent, proportionate, and evidence-based**.
- National leadership is essential for effective communication and public understanding.

The WCWC stands ready to support the Government's forthcoming Water White Paper.

## **PROLOGUE**

1 The WCWC now recognises that the best metaphor for delivery of delivery of good water management is a complex web of interconnected initiatives. Sometimes not sorting out the small issues can get in the way of delivering the big solutions. The 'devil can be in the detail' As a result, some critical but narrowly focused concerns are often overlooked in the broader debate. A good example being the technical definition of non-compliance with permits being at the heart of issues like more exacting penalties for Water Companies. The contributions by the WCWC attempt a balance.

2 Readers are encouraged to delve into the source papers on the WCWC website. The papers produced by the Company always go further than just answering the questions. It is essential that the background of the response is included to help the wider reader audience understand the issues before setting out suggestions for the ways forward are set out.

3 The WCWC has consistently provided evidence, based on experience; it has not sought to praise or admonish any organisation, but has provided support and comment and made suggestions as to where, it is of an opinion, would help. It does note that the whole topic of water services has returned to the media and political agenda, as it has many times in the past, particularly in the 1970s prior to regionalisation, and in the 1980s prior to privatisation. This return has been driven by the concerns over the impact of water charges on the cost of living, the impact of climate change, rising population, greater concerns over a diminishing natural world and greater demands on the uses of environmental waters, particularly wild swimming (driven in part by the social impact of the lockdowns in the covid crisis), and the perceived performance of the water companies and their leadership is a central target.

4 The WCWC has repeated several times that the debate on water management is bedevilled either by poor information and presentation or complex statistics which can be interpreted in different ways. This must be remedied in whatever comes next in water governance. The problem involves complex technical challenges, oversimplified by media and politics, poor communication, and a web of conflicting issues around rising water service costs, limited investment funds, and balancing investor returns.

5 It is worth considering how the complexity is addressed in this Overview. There is a tendency in preparing a summary like this to want 'the top three messages.' As life often reveals, whilst the focus is on these strategic issues, the tactical issues, set aside for a moment, have tendency to sting unexpectedly, as explained earlier. The Consultations to which the WCWC has responded have been largely on tactical issues and there has been no advance yet on the 'big picture'. This Overview focuses on what the WCWC has suggested for the long-term strategies, and includes some suggestions on key, but not all, tactical issues. It focuses on what was said in 2025, in context, and does not seek to be a 'magnum opus' on water management. It is recommended that this Overview be studied in conjunction with previous Overviews. It does not seek to analyse the detail of the Final Report of the Independent Water Commission and awaits the promised White Paper but does conclude with some observations.

6 On the whole, the WCWC has supported the thrusts of the Consultations, with some exceptions, and with caveats on detail and execution, sometimes of a substantial nature. Some of the consistent messages are set out below, but at the heart is the observation that there is still not an overarching water strategy into which all the initiatives can fit. And this is consistent with one of the issues identified by the Cunliffe Commission. There has been a focus of governance, particularly of Water Companies, which missed the point is that there needs to be a 'common hymn sheet' from which all the parties understand their responsibilities. This is a different matter to reorganizing the governance and creating 'unified organisations.' Strategy first, delivery and governance follow.

7 Government itself has responsibilities and roles beyond 'directing' the water sector.

8 So,

- Many of the Consultations seem evolve in 'silos'
- Some Consultations seem to lack appreciation of other relevant policies and even Regulations and do not understand the relationship of tactical change and strategic change
- Government has been slow in dealing with its responsibilities during 2025; examples include attention to highway drainage controls, the introduction of Mandatory Sustainable Drainage Systems, more widespread regulation of what can be put down toilets, and the control of PFAS in the water environment

### **The need for an Overarching Water Strategy for England and Wales**

9 During 2025 the WCWC has evolved its past suggestion, highlighted in the previous Overviews, for an Overarching Water Strategy for England and Wales, to have, as a major feature, a new integrated Water Regulatory Position Statement. In responding to a Consultation on industrial emission permits in October, the WCWC suggested that all Regulatory Position Statements (RPS) are in need of review and that for water is in dire need.

<https://www.gov.uk/government/collections/basic-rules-environmental-permitting-regulatory-positions>

<https://waterconservators.org/wp-content/uploads/filr/3976/OCT-25-REGULATION-Response-to-Defra-on-emission-permits-fin2.pdf>

10 That is different to the Strategic Position Statement for Ofwat

<https://www.gov.uk/government/publications/strategic-policy-statement-to-ofwat-incorporating-social-and-environmental-guidance>

and different to Water Company Strategic Direction Statements

<https://www.ofwat.gov.uk/publications/strategic-direction-statements/>

11 The water section in the EIP revised in December 2025 is a step in the right direction, whilst it is comprehensive, but is still only a partial action plan. Reference to the 2023 Water Plan has disappeared and there are crucial issues missing, which are high on political agenda elsewhere. For example, the failure of the Water Framework Directive Regulation Chemical Status due to PFAS and the steps needed from Government (as set out in the 2023 Water Plan) are missing. How this fits together with a revision of the 2023 Water Plan, which is no longer featured, is also worth considering; the EIP needs close attention. Some specific examples are given in more detailed Sections of this Overview.

<https://www.gov.uk/government/publications/environmental-improvement-plan-2025/environmental-improvement-plan-eip-2025>

<https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water>

12 The 2023 Plan for Water, the 2025 Environmental Improvement Plan, a new water RPS, and a new SPS all need bringing together. The WCWC agrees with the Water Commission that this all needs sorting out and must form part of how the Government responds, in fact the commitment to respond is referred to in the EIP and this Overview will return to this in the final sections. The new strategy should , as the WCWC describes, be an overarching framework .It should not seek to micro- manage , but, as with so many aspects of life, the 'devil is in the detail ' as many of the consultations show and the WCWC has explained

13. So to resolve the current disparities , individual initiatives , policies and regulations should flow from that strategy , which would act as a 'one stop shop hub' for all relevant contributions to a better future for water..It should include a clear framework of standards to be achieved and adhered to, with timetables co-ordinated with the Periodic Review process . New must to be clearly costed and clear statements made as to how they will impact on charges, with standards delayed until funding is secured through the Periodic review process.

<https://www.gov.uk/government/publications/independent-water-commission-review-of-the-water-sector>

14 Many initiatives can only be understood by thinking of their interconnections as a web which makes creating simple Overviews, like this, a challenge. This is exemplified by the issue of planning and the accelerated new homes programme, which in turn connects to many other programmes and initiatives such as, water resources and drainage planning, water efficiency, charges, building regulations. This Overview attempts to put them into a web context and discuss them individually under specific headings later. A new overarching strategy must encompass the concept of interconnecting webs.

15 National communication is in sore need of attention. For example, the national leadership by Ofwat on water efficiency is not mirrored by a similar initiative on 'bag it and bin it' for the disposal of used hygiene and cosmetic products and the past national support of biosolids use in agriculture was missing during an ill-informed media campaign in the Summer. All this is left to the Water Companies.

## **INDEX BY PARAGRAPH OF THE KEY POINTS OF SUBMISSIONS AND THINKPIECES**

### **16-29 HIGHLIGHTS of 2025**

#### **17 Tougher regulations:**

The Water (Special Measures) Act 2025 January  
Set the tone for several pieces of Regulation

#### **18 Fundamental changes recommended to water regulation and planning**

July The Cunliffe Commission's Final Report

#### **19 Completion of PR24**

April New AMP 2025-30  
Big increase in investments  
Controversial price rises

#### **20 Water in economic growth**

Big push on Plan for Change throughout year

#### **21 New homes boom**

Drive throughout year to provide 1.5 million new homes in this Parliament.  
Impact on water services and the consequences for planning

#### **22-24 Changes to planning**

- Infrastructure and Planning Act passed eventually December with consequences for speed and extent of planning permissions
- A number of new initiatives throughout the year, including Nature Restoration Fund and Environmental Delivery Plans and changes to BNG

#### **25 Dry Summer**

Lowering reservoirs and hosepipe bans

#### **26-27 Forever substances**

Increasing concerns over PFAS and microplastics.

#### **28 Environment Improvement Plan**

December Revised edition

**29 New versus existing initiatives**  
Ongoing work affected by new initiatives

**SOME SPECIFIC ISSUES**

**31-51 The web of permit structure and compliance**

A complex area of accountability, law, statistics and media over-simplification

**31-33 Enforcement Levies**

- Defra consultation May on EA levy
- WCWC agreed that the EA must be funded fully but submitted that the proposals were asymmetric and should be extended to other sectors
- No new levy class needed.

**34-36 Emissions Permits**

- WCWC supported proposals by Defra in October
- Suggested new system of RPS needed; used water as an example
- Highlighted differences of Bespoke and Standard Rules permits

**37 Small discharges of sewage**

- WCWC supported proposals by Defra in October
- Continued narrative on 'descriptive consents' Standing Rules and General Binding Rules

**38-43 Tightening penalties**

- Consultation by Defra in November. WCWC concerned about several aspects
- No parallel initiatives for other sectors
- Principal focus on storm overflows but changes to legislation will affect all permits
- Lack of understanding of different permit types
- Concern over appeal mechanisms
- Need for clarity on the definition of non- compliance including reasons beyond Water Company control

**44–46 Metrics of non- compliance**

- Ofwat consulted in December
- Proposals too complicated,
- Deferred until issues on compliance etc resolved.
- Best metrics would be number of successful legal actions by EA

**47-51 Measuring non- compliance**

- Permit setting criteria and monitoring criteria must be the same
- Concern about the continuing misconception about operator self-monitoring, even by the Independent Water Commission and reaffirmed the proposals put forward with CIWEM and BSI for a new system

## 52-80 **The web of Storm and Emergency Overflows**

Overflows can be caused by many reasons, and this links back to the previous paragraphs on permit compliance.

### 52-75 **Guidance**

- Highlighted ongoing issues particularly on guidance in response to proposals by Defra in January; modified later in final version in March but still needing change.
- Why exclude emergency overflows, they were included before
- Other issues on sewer design and management are picked up in following paragraphs
- Still no resolution of S106 Water Industry Act rights of connection

### 76-79 **Bag it and Bin it**

Used hygiene and cosmetic products disposed down toilets are a major cause of sewer overflows

- Changing habits, too much is left to Water Companies
- Much more is needed than the single use wet wipes ban planned for 2027. The WCWC continued with its suggested plan set out in early 2022; more determined action by Defra is needed
- At the very least, the voluntary labelling promised in the 2023 Water Plan needs energising.
- There must be a national communications plan.

### 80-81 **SuDS**

Surface water from new builds will be a problem. Latest EIP signals progress on a formal system but still no commitment to regulations

## 82–98 **The web of catchments and development planning**

These are linked together insofar that it is expected that the future will be based on catchment planning which will influence infrastructure and development planning which in turn will iterate back to influence catchment planning. River basins and catchments areas are the fundamental governance units of water companies and the EA.

### 82-90 **Catchments**

The WCWC is pleased that the Independent Water Commission's Final Report and the EIP are featuring catchments as driver. Underlining them is the principle of integrated natural resources management which must be maintained.

### 91-99 **Planning**

- The principal drivers have been implementation of the 2024 NPPF (now out for consultation for further revision and the progress of the Infrastructure and Planning Act.
- WCWC pleased to see a more holistic approach to the impact of development, it remains unconvinced that there should be separate Environmental Delivery Plans for water (nutrients are used as an example) and that the principles must be embedded in Catchment Plans. There must be a one stop shop for EA and NE.
- The WCWC commented on the proposals for changing BNG and is concerned about the change of threshold. Suggested that baseline should be biodiversity net zero, but this was not included in the final version

- Still no discussion on rights of connection under the Water Industry Act

## 100-125 **The web of 'forever substances'**

In preparing this Overview it was decided to assign a separate section on PFAS and microplastics bearing in mind the media attention to these. It is located between the section dealing with catchments and that for bioresources as they affect both

### 100-118 **PFAS**

- The WCWC provided evidence to the EAC Inquiry in May and highlighted the issues of PFAS in a Thinkpiece in September.
- The problem is historic presence post ban legacy products and future use.
- Explained contribution to the poor chemical status of controlled waters and past Defra plans.
- Water pollution transitory, soil pollution is a long-term accumulation
- Too much emphasis was placed on what water companies need to do and not enough on national effort.
- Removal from any kind of water and from bioresources expensive and could result in changes in bioresources practices and a swing way from biosolids.
- Proposed some new modelling particularly for long term assessment of impact of biosolids on soils.
- More government action and leadership needed
- Swift and extensive ban on the use of these products.
- Need changes to trade effluent legislation
- More soil research and further effort on analytical methods

### 119-127 **Microplastics**

- In many ways the issues and their resolution mirror those of PFAS.
- Reviewed sources, mostly textiles, but some products with added microplastics.
- The paradox is that sewage treatment will increase content in bioresources and then accumulation in soil which remains in place even if bans are brought in.
- More government action and communication, e.g. trade effluent, washing machine, and product regulations.
- More soil research and analytical methods needed urgently to provide the same modelling as proposed for PFAS.

## 128–148 **The web of bioresources**

September Think piece comprehensive review to fill communication gap. WCWC was dismayed at the ill-informed public debate.

### 127 -130 **Roots of current practices**

- Explained how the current system works

### 131-136 **Changes in approach**

- Ofwat want diversification beyond use of biosolids in agriculture

- This Overview has already referred to the issues of PFAS and microplastics needing new technologies; Farming Rules for Water is also causing a lack of available land bank for biosolids
- EA wanted to introduce a permitting regime in 2023 probably by Standard Rules permitting
- So, diversification and less reliance on biosolids needed new technologies with lots of innovation
- Water UK launched a water industry strategy in 2023 in preparation for PR24 to cope with these issues

#### 138-139 **Problems with progress and communication**

- Slow progress by the EA and Water UK in 2025 which contributed to the wisdom gap in the media
- Nomenclature needs sorting out
- References need storage

#### 140-148 **One stop shop the way forward**

- WCWC put forward suggestion for a revival of the past single focus for strategy and policy with one hymn sheet
- This would harmonise with the recommendations of the Independent Water Commission
- Defra 2025 EIP framework for sewage sludge use in agriculture must adhere to the principles set out, yet still no overall framework
- WCWC Set out suggestions for how to deal with forever substances, using Land Agents for Farming Rules for Water. continued self-monitoring, re-integration of Standing Committee of Analysts and Crop Trial.

#### 149-172 **The web connecting water resources and the consumption of water by homes**

This focussed on some implications of the relationship between water resources with growth of the economy and, availability of new homes. These resources will determine where new towns can be located, at the same time those towns will stress resources and drainage systems. This iterates back to previous sections dealing with planning.

#### 152-159 **Circular water economy**

- Focussed on Thinkpiece produced for the UK Water Partnership
- Sought to better locate CWE a part of water resources
- Lot of indirect cycling at present via rivers
- Distinction between macro schemes managed by water companies and micro schemes in homes

#### 160 -166 **Water efficiency**

- Focussed on Defra consultation on changes to Building Regulations in December
- WCWC supported these with the caveat that they match the existing Ofwat Environmental Incentives Scheme

#### 167-170 **New homes**

- The WCWC provided a Thinkpiece to the New Towns Task force in May which provided a framework of criteria for home design in New Towns pulling together the issues identified in this Overview including SuDS, and

'bag it and bin it.' Modified later after the Consultation on Building Regulations.

#### 171-172 Existing homes

- Emphasised the importance of cutting consumption
- Suggested re-purposing the Incentives scheme money into helping existing customers
- Emphasised the need for national messaging; cutting consumption cannot be left just to Water Companies
- This messaging to make universal metering even more compelling

#### 173 Charges

- Identified problems with using charging structures to cut consumption
- Noted energy sector moving to do away with standing charges

#### 174-175 The Independent Water Commission and the forthcoming White Paper

- A summary of key points made to the Independent Commission, which might be of some relevance for the future

### HIGHLIGHT ISSUES IN 2025

16 During 2025, the webs referred to above have become even more complex. To help understand this, it is necessary to go back to the events after the last election and to some extent repeat some of the Overview of January 2025.

#### Tougher regulation of water companies

17 A much tougher regulatory regime for Water Companies set out initially in the Water (Special Measures) Act 2025 in February.

<https://www.legislation.gov.uk/ukpga/2025/5/contents>

This Act tackles water pollution and poor company performance, giving regulators stronger powers, imposing personal liability on executives, banning bonuses for polluting, mandating real-time sewage monitoring, and introducing automatic fines for offenses, aiming to ensure greater accountability and improve water quality. Key provisions include new governance rules, lower proof standards for penalties, and requirements for pollution reduction plans and nature-based solutions.

This has driven several initiatives during 2025 and the rhetoric around the passing of the Act 2025 in December provides an insight into the political processes underpinning recent and current consultations

<https://www.gov.uk/government/publications/water-special-measures-bill-policy-statement/water-special-measures-bill-policy-statement>

## **The Independent Water Commission Review**

18 A major review by an Independent Water Commission, chaired by Sir Jon Cunliffe to which the WCWC responded and which reported in July 2025; the Government White Paper in response to was due in December 2025 and this is awaited. Whilst this is a major catalyst in the way forward and deserves to be high in this list, this Overview will deal with the issues last as the WCWC responses to the ongoing Consultations will impact on its response to the White Paper following the Independent Water Commission Report.

<https://www.gov.uk/government/publications/independent-water-commission-review-of-the-water-sector>

## **Completion of the PR24 Price Reviews for Water Companies**

19 Completion of the Price Review processes and the introduction of the five-year programme of Water Company investment and management starting in April 2025. This oversees investment of £104 billion in that period which started with significant price rises for the year 2025-26 and much criticism. The issue of water company debt, particularly in Thames Water, constantly coloured media reports.

<https://www.ofwat.gov.uk/wp-content/uploads/2024/12/9.-PR24-final-determinations-Expenditure-allowances.pdf>

<https://www.ccw.org.uk/publication/what-we-learned-from-pr24/>

## **Water as an enabler and not an impediment to economic growth**

20 Economic growth became a dominant factor; and water needing to be an enabler rather than an impediment. This followed on from the programme of the previous Government. Water is only mentioned by reference to reservoirs in the headlines of Consultations on planning, and as noted previously, to the high water usage of the giga and hydrogen economies in growth strategies. Water is not designated as a sector under the Industrial Strategy.

<https://www.gov.uk/missions/economic-growth>

<https://www.ice.org.uk/news-views-insights/latest-news/uk-water-sector-crisis-threatens-to-stunt-growth>

## **The New Homes boom**

21 As part of the plans for growth, the Government announced an extended, quickened new homes construction programme of 1.5 million new homes by 2030 which highlighted pressures on water resources and drainage capacity. And it also highlighted issues with the planning system

<https://www.gov.uk/missions/economic-growth>

<https://www.hbf.co.uk/news/drain-nation-release/>

## **Changes to planning following on from the Plans for Growth**

22 And the previous Overviews discussed this matter at length. The Infrastructure and Planning Act was passed in December 2025, and the Government has launched a Consultation on further revision of the NPPF in December 2025 to which the WCWC will respond.

<https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

<https://www.gov.uk/government/news/landmark-planning-and-infrastructure-bill-becomes-law#:~:text=The%20Planning%20and%20Infrastructure%20Act%20will%20support%20the%20delivery%20of,energy%20bills%20in%20the%20future.>

23 The Government press release on the Act, hyperlinked above, contained the following statement from the water minister.

*“Water security is critical for our economy, food, energy, housing, and environment. Yet even as shortages grow, we haven’t built a new reservoir in 30 years. That’s why we’re cutting red tape and fast-tracking vital reservoirs. With £104 billion already secured for the water sector, our Water White Paper will deliver long-term reforms to get spades in the ground and infrastructure built.”*

*With the landmark Planning and Infrastructure Act now set in stone, a wide range of measures will be brought forward at haste to speed up housebuilding and the delivery of critical infrastructure. Key changes in the Act include:*

- *New Nature Restoration Fund will allow developers to get spades in the ground faster for multiple housing and infrastructure projects, with Natural England putting in place pro-nature measures at scale to restore natural habitats and wildlife.*
- *Limiting the number of attempts at legal challenge against government decisions on major infrastructure projects, with only one attempt rather than three for cases deemed by the court as totally without merit.*
- *Modernising planning committees to focus on the most significant developments rather than smaller projects, speeding up local decisions on new homes.*

24 This gives an insight into current Government thinking. It seems to assume that the PR24 settlement will cope with the additional demands on water services and does not recognise the depth and breadth of the impact of economic and housing growth.

### **A very dry Summer with hosepipe bans and empty reservoirs**

25 This certainly energised all discussion on water management in 2025

<https://waterwise.org.uk/protect-our-water-drought-and-hosepipe-bans-begin/>  
<https://www.metoffice.gov.uk/about-us/news-and-media/media-centre/weather-and-climate-news/2025/summer-2025-is-the-warmest-on-record-for-the-uk>

### **Forever Substances**

26 The year saw the issues on PFAS and microplastics (which this overview combines with ‘forever substances’) enter the lexicon of day-to-day discussion through ill-informed media concerns and several scientific reports on their presence in river and drinking water and in biosolids applied to agricultural land. Aside from this rhetoric they are serious issue of environmental quality.

## **Environmental Improvement Plan**

27 The long-promised revision of the Environment Improvement Plan and targets therein were published in December 2025

<https://www.gov.uk/government/publications/environmental-improvement-plan-2025/environmental-improvement-plan-eip-2025>

The WCWC produced a briefing on the parts relevant to water

<https://waterconservators.org/wp-content/uploads/filr/4080/DEC-25-REGULATION-Briefing-note-on-the-Dec-2025-EIP.pdf>

28 As referred to earlier, although this sets a comprehensive list of targets, there are several actions, incumbent on Government itself, missing. Earlier reference is made to the absence of action on PFAS and as further example there is no reference to action on microplastics emissions such as from washing machines and that was highlighted in a Thinkpiece on bioresources in September.

<https://waterconservators.org/wp-content/uploads/filr/3820/Sept-25-BIORESOURCES-Thinkpiece.pdf>

## **Ongoing versus new initiatives**

29 Much of the current work of Ofwat has its origins in processes which have been ongoing for some time. The challenge has been that the evolution of ongoing work has been influenced by the early policy statements and regulatory initiatives of the Government, which in some ways anticipate what might happen as a result of implementation of the recommendations of the Independent Water Commission, which in turn iterated back to what the Government set out were its intentions at the passing of the 2025 Act in February. This all happened alongside 'business as usual' in terms of coping with ongoing issues like climate change, statutory periods of other reviews such as of river basins.

<https://engageenvironmentagency.uk.engagementhq.com/river-basin-management-plans>

## **SOME SPECIFIC ISSUES ADDRESSED IN 2025 BY THE WCWC**

### **The web of permit structure and compliance**

#### **Non-compliance with permits more than just a technical issue. It drives reputation, investment and even risk of imprisonment**

30 Responses to several Consultations had, at their heart, concerns about non-compliance particularly in relation to penalties imposed on Water Companies. Getting this wrong could result in long term arguments over data, legally unsafe penalties and misdirection of investment. And non-compliance statistics fuel controversy in the media and politics. The WCWC does not excuse poor performance, but it has sought to draw attention that 'there is more to this than meets the eye'.

### **EA levies for enforcement**

31 In May 2025 the Company responded to a Consultation on charges levied by the EA for monitoring, which would be affected by any changes to the monitoring regime The WCWC

agreed in principle, that the EA needs to be adequately funded to carry out its duties of permitting and enforcement for the Water Industry.

<https://waterconservators.org/wp-content/uploads/filr/3485/May-25-CHARGES-Response-to-EA-consultation-on-Enforcement-Levy.pdf>

32 The WCWC submitted that the proposals were discriminatory against the water sector, partial in application and unnecessarily complicated. There was no practical reason to create a parallel set of rules for the collection of a separate levy. Provisions already exist for additional income to be generated by an amended Annual Charges Scheme. The proposals complicated matters with a number of exceptions and commentary on matters, such as Company gearing, when there is an established framework.

33 The WCWC suggested that these proposals are recast as amendments to the existing scheme. They showed no sign of an overall strategy for EA funding to deliver compliance with the requirements of the Water Framework Directive Regulations or whatever succeeds them. There is no hint of other mechanisms, within a proper business case, about how other users and polluters will contribute to EA resources. Could there be a Highway Drainage Levy? The WCWC suggested that Defra should start work on a more structured approach to the funding of resources by users and polluters, including government itself.

### **Emissions permits**

34 In October 2025 Defra consulted on a review of industrial emissions permitting and the WCWC responded taking advantage to set out a new Regulatory Position Statement Framework which would embrace one for water conservation management, which could fill part of the void of the absence of an overall water strategy.

<https://waterconservators.org/wp-content/uploads/filr/3976/OCT-25-REGULATION-Response-to-Defra-on-emission-permits-fin2.pdf>

35 The WCWC took advantage of the submission to point out the differences in consequences for Bespoke and Standard Rules Permits, an issue of significance in the later Consultation on penalties for non-compliance with permits.

36 The WCWC response also asked the broader question of how the use of digital services could be made more explicit in this process of modernisation and refers to the launch by the Environment Agency earlier this year of the Accelerated Permitting Transformation (APT) Programme to modernise the entire permitting system, working closely with the Defra.

<https://environmentagency.blog.gov.uk/2025/07/02/improving-our-environmental-permitting-service/>

### **Small discharges of sewage**

37 The response on emissions was used to underpin the Company response to a Consultation, also in October 2025, on the permitting of small sewage discharges

<https://waterconservators.org/wp-content/uploads/filr/3999/OCT-25-WATER-REGULATION-Response-to-Defra-on-permitting-of-small-sewage-discharges-fin.pdf>

## **Tightening penalties for water company non-compliance with permits and licences**

38 Unfortunately the understanding of the inner layers of this issue remained unenlightened. In November Defra consulted on the anticipated changes to liabilities and penalties on water companies for non-compliance which most certainly needs better definition.

<https://waterconservators.org/wp-content/uploads/filr/4043/NOV-25-REGULATION-Response-to-Defra-consultation-on-Water-Company-penalties.pdf>

39 The WCWC did not offer any comments on the 'political optics' or the size of the penalties, or the exact legalities of what is proposed, and restricts its contribution to the broader context and the technical implications of the proposed changes. The WCWC stated that it does understand the drive for greater accountability of water companies for non-compliance with permit conditions, and the need to streamline the process for the Environment Agency. To use a colloquial expression, 'we are where we are'. These proposals set out the consequences of the special measures in the Act of February 2025

40 The WCWC was concerned about practicalities. There are many aspects of these proposals which need a great deal of attention before new Permitting Regulations can be drafted. And the WCWC highlighted several points. The WCWC emphasised that at the heart was the definition of non-compliance getting this wrong would have consequences for legal liabilities, investments, reputation and creating long legal disputes; and was concerned about the role of appeal mechanisms in the proposed process.

41 The Consultation focussed on Storm and Emergency Overflow, but the amendment to the relevant current Regulations to allow new penalties appears to be generic. So, what will be the consequences for other permitted and licenced Water Company activities? It could even apply to whatever emerges from the regulatory review of biosolids, long since promised and highlighted in the Water Commission report, as set out in the EIP.

42 The WCWC suggested strongly that a more symmetrical approach to permitting, recognition be given to regulating the external causes of discharge failure and that Defra itself can contribute, examples being to bring in Regulations for Mandatory Sustainable Drainage Systems (the EIP is equivocal on this), further revisions of Building Regulations and further restrictions on the sale and disposal of sanitary and hygiene products. Whilst the WCWC has heard the arguments about the 'nanny state' and regulation it does suggest that if the drive is to hold the water companies to even more accountability, that statutory responsibility must be extended elsewhere

43 The submission gave examples of reasons for non-compliance, the distinction of trivial, minor and major non-compliance and how these are reflected in the regulatory regime and asks how much needs to go into permits per se, and how much goes into accompanying statutory guidance. Such legal matters are rarely 'black and white'. The WCWC suggested that it could be appropriate to have a Code of Practice somewhat similar to that used in waste management and this would fit into the new Water RPS.

## **The metrics of non-compliance**

44 The WCWC has opined on this before in relation to EA, but in December Ofwat consulted on changes to its metrics of non-compliance and the WCWC used its thinking on this matter to formulate its response

<https://waterconservators.org/wp-content/uploads/filr/4084/DEC25-REGULATION-Response-to-the-Ofwat-consultation-on-environmental-compliance-metrics-fin.pdf>

45 Amongst several points, the WCWC drew attention to other initiatives by Defra and the Environment Agency which are relevant to the notions of compliance with permits. It suggested that since the commitment to amend preceded other changes, including any arising from implementation of the recommendations of the Independent Commission on Water, these changes should be suspended.

46 The purpose of compliance metrics must not only be to provide published data but also to stimulate action at the highest corporate levels. There are many reasons why the data may include events beyond the control of water companies (as described in the Submission on penalties). What is most important is the action taken by the EA through legal processes and that must be compelling information driving actions at board levels. The WCWC submits that number of successful legal actions is a much more useful metric. It also suggests that that set of metrics should be included in an EA compliance Code of Practice and a revised Defra integrated water Regulatory Position Statement, as set out in its response to the consultation on penalties for water companies.

<https://waterconservators.org/wp-content/uploads/filr/4043/NOV-25-REGULATION-Response-to-Defra-consultation-on-Water-Company-penalties.pdf>

### **Measuring non-compliance**

47 The points set out above highlight the absolute need for compliance and non-compliance, to be measured properly. The WCWC has already pointed out a stark difference in the approaches to Bespoke and Standard Rules Permits. The measurement and collection of data were highlighted in previous Overviews and the WCWC continue to express its concerns throughout 2025. There are two interlinked issues. The first is the growing focus on continuous monitoring. Whilst this may be valuable in Water Company monitoring under S82 of the Environment Act, this has been confused with sewage effluent permit monitoring. The second is that there is a void in understanding that the terms of monitoring must be identical to the terms of setting the criteria in permits.

48 This Overview does not seek to set out yet again in detail the problems of proposed changes to operator self-monitoring. The issue needs to be clarified to distinguish between perceived problems of the monitoring by water companies per se and the reporting of data therefrom to the Environment Agency. In 1985, after extensive work, it was decided that the aim of sewage treatment, for the central sanitary determinands (BOD and suspended solids) was best expressed as 95 percentile variation from day to day (the look up table with an upper limit) approach; instantaneous variation was not relevant to river quality, management and modelling was developed on that basis. At the time the water authorities had no independent auditor, so it was perceived as a commitment of responsibility for them to conduct the monitoring properly. That principle survived privatisation in 1989 with monitoring being left to the water companies working to the principles of quality assurance, which fitted the management of 24-hour composite sampling. In 1991, this was adopted by the EU in the Urban Wastewater Treatment Directive. The system was tightened in 2009 by the Environment Agency when the term Operator Self-Monitoring was introduced.

49 If the monitoring is handed to a third party it will be expensive and challenging for it to maintain the 24-hour composite regime and there will be pressures to convert to a spot sample regime or even continuous monitors for compliance monitoring. This would require a complete overhaul of the permitting regime, a move away from the UWWTD Regulations and the development of a whole set of new design and operational concepts. Continuous monitoring would mean abandoning BOD as the crucial determinand. The continuing stance of doing away with this system as expressed in the EIP fails to recognise this.

50 The WCWC, together with the CIWEM and BSI, have put forward a revision and overhaul of the system which allows the basic principles to remain but set in a more trustworthy environment.

51 The Company submitted a Think piece to the Water Commission in February which reflected its views expressed in previous Overviews in which discharge quality assurance is a ring-fenced activity within water companies independently audited by a third party such as BSI, in a way analogous to the role of health and safety. It would embrace all discharges, include the S82 Environment Act monitoring by water companies, EDMs, DWF monitoring, and if bioresources application to land is permitted it could embrace that as well.

<https://waterconservators.org/wp-content/uploads/filr/3300/Feb-25-MONITORING-Submission-to-WATER-COMMISSION.pdf>

### **The web of Storm and Emergency Overflows**

52 A great deal of focus was placed on this issue continuing from past years .And in its responses the WCWC as repeated its insights that there must be a clarity of strategic management in that even when, and if, the programmes of investments in these overflows are completed and there is the very best operational management, the desired Water Framework Directive Regulation status for controlled waters, and compliance of designated bathing water sites may still not be achieved , due to the impact of other contribution. And the submissions by WCWC provided ample evidence of the web of interconnections with other issues .This Overview has an extended focus bearing in mind the mind the interest over the year

53 The year started with a focus in the Water ( Special Measures )Act 2025, in which part of the Act brought emergency overflow monitoring and reporting into line with storm overflows.

[https://data.parliament.uk/DepositedPapers/Files/DEP2025-0084/Committee Fact Sheet Emergency Overflows and Storm Overflows.pdf#:~:text=%E2%80%A2%20Untreated%20sewage%20discharges%20through,circumstances%20in%20which%20overflows%20are](https://data.parliament.uk/DepositedPapers/Files/DEP2025-0084/Committee%20Fact%20Sheet%20Emergency%20Overflows%20and%20Storm%20Overflows.pdf#:~:text=%E2%80%A2%20Untreated%20sewage%20discharges%20through,circumstances%20in%20which%20overflows%20are)

[The Future Of Event Duration Monitoring | Adler & Allan](#)

[Storm overflows: policy and guidance - GOV.UK](#)

54 Storm and emergency overflows were used as the central feature of the proposals on penalties for non-compliance with permits. The WCWC has repeated its insights into why permits for these overflows might be breached for reasons other than poor management or lack of investment.

55 In January 2025 Defra consulted on policy and guidance for storm overflows and the WCWC responded. The following paragraphs record a summary of what was submitted suitably modified to reflect events in 2025.

<https://waterconservators.org/wp-content/uploads/filr/3439/Jan-25-STORM2025-OVERFLOWS-Submission-to-Defra-consultation-on-guidance.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3438/Jan-25-STORM-OVERFLOWS-Second-edition-Submission-to-Defra-consultation-on-guidance-and-to-the-EA-consultation-on-SOAF.pdf>

56 The WCWC found it challenging to understand the positioning of this draft guidance and its content in the context of all the existing guidance, so it set this out as background to provide fundamental understanding in an Appendix. It could not locate a copy of the original draft 1997 Guidance in the public domain, nor the promised parallel Environment Agency Consultation on the Storm Overflow Assessment Framework SOAF.

57 The focus on the 1997 Draft Guidance for the 1994 UWWTD Regulations seemed misplaced. The WCWC recognised that it is helpful to have guidance on all regulations, but the focus of delivery of the SODRP is the execution of the 2016 Permitting Regulations, which make no reference to the Draft UWWTD Regulations Guidance. In the current circumstances it would seem more logical to take all of the technical advice out of the draft 1997 Guidance and incorporate it into updated 2018 Guidance (which should also assimilate the separate Guidance on DWF etc). This would leave the bare principles of applying the UWWTD in the updated and 'de-drafted' 1997 Guidance with cross reference to the updated 2018 Guidance. Defra should consider the interests of the users of the Guidance and ensure that when non-professionals seek to understand what the application of regulations should be.

58 The WCWC noted that Guidance issued in 2018 referred to Emergency Overflows as well as Storm Overflows. This proposed Guidance did not. Which is surprising, bearing in mind that the high-profile Water (Special Measures) Bill was going through Parliament at time (and confirmed in the Act) which extends the statutory provision of Event Duration Monitors to Emergency Overflows. The WCWC urged Defra to include them.

59 Since 2018 the concepts of risk management in the control of storm overflows need to be more clearly articulated. The WCWC set out these principles in its response on the Bathing Water Regulation consultation in 2024. This Consultation did not mention risk. And there needed to be a much better articulation of how this guidance would integrate into the principles of catchment management as set out again in the response on the previous response on Bathing Waters.

60 The Consultation did not elaborate enough on the steps necessary to ensure the crucial role of monitoring for which there are several programmes and which the WCWC has suggested should be integrated under one focus of quality assurance governance in Water Companies as described in earlier paragraphs

61 The WCWC did not intend this submission to be a lengthy treatise on all the components of sewage, it did want to highlight aspects which are bypassed by the Consultation, and which will impact on the SODRP. Of course, Water Companies have control over trade effluent, subject to the rights of appeal by dischargers. The Companies have very little, if any, control over the amount of domestic wastewater or its contents added to sewers which may cause problems with overflows. Nor do they have any control over the amount of rainwater which is added to systems. Several of this lie within the remits of government and regulators which have not been addressed yet. These points are addressed elsewhere in this Overview in which the impact of the New Homes Programme and the benefits of Sustainable Drainage Systems are discussed below.

62 The WCWC emphasised that the maintenance of sewers is absolutely crucial, so every effort has to be made to avoid blockages which are dealt with by costly sewer cleaning programmes and by regulating what is put into sewers. Each Water Company has conducted its own 'bag it and bin it' and grease / fat / oil campaigns with customers. There is no coordinated national effort, as has been proposed by Ofwat to coordinate water efficiency messaging and innovation. The previous, and present, governments have done nothing about the disposal of used sanitary and cleaning ware beyond the banning of single use wet wipes in 2025, which even SORDP refers to. The WCWC has repeatedly suggested the

need for a wider, deeper programme, including mandatory labelling. This is addressed elsewhere in this Overview.

63 As explained at length, the presence of surface water in combined sewage from new-build properties should be regulated. Even more important is the failure of this, and the previous Government to carry through implementation of Schedule 3 of the 2010 Floods and Water Act requiring the installation of Sustainable Drainage Systems for new properties in England (Wales has already done this) in spite of a commitment to do so in the SODRP plan, which stated that this was necessary and would be done. This would help with the hydraulic impacts of the new plans by the current government for an extended housing programme. The December 2025 EIP indicates progress, but is equivocal, about the mandatory aspect. No reference was made to the revision of the NPPF, the latest edition being published in December 2024 (as reported earlier this is out for review again). The SuDS, whether mandatory or voluntary, should include blue/green solutions, wherever practical. The WCWC hopes that this will underpin the review promised in the EIP.

64 There is for a need for a commentary on S106 of the Water Industry Act which gives developers automatic right of connection of domestic sewage to sewer with a complex appeal process. Whilst reduction of domestic water consumption will have a small but welcome impact, there was no connection in the proposed Guidance to the work intended to reduce consumption through the Water Efficiency Road Map and consideration needs to be given to the design targets for new build which would require the 2010 Building Regulations and the 1999 Water Fitting Regulations to be revised. There was a later Consultation on the Building Regulations.

65 The design of bathrooms, water fittings, sewer connections of domestic wastewater and surface water must be dealt with by the Government initiative, the Future Homes Hub. The WCWC poses the question; should sink disposal units for food waste be banned? This was addressed by a later submission of a Thinkpiece to the New Towns Taskforce.

66 The WCWC recognised that the inclusion of this information whilst highly relevant is beyond the scope of the proposed guidance, even if the approach of incorporating most of the proposals into updated 2018 were to be adopted. The guidance is focused on the regulation of delivery of the SODRP by Water Companies.

67 The WCWC pointed out that reduction of infiltration is also essential to managing overflows. Of course, the reverse might happen with leaky sewers during dry weather and that is equally undesirable, which might eventually collapse with blockages and emergency overflows. Sewers may deteriorate by fracturing, due to soil movement for a variety of meteorological reasons. So, climate change affects groundwater as well. The nature of this problem is highlighted in the discussion after the BBC report and needs particular attention, for example by Wessex Water in its infiltration reduction plan. It may not bring the benefits planned.

68 The WCWC has offered comments all of these aspects. Once again sorting them out in an integrated approach seems vital. The WCWC also recognised that even if a way could be found to include these aspects, it might take some while to achieve, so there may need to be a plan for a series of future updates as the issues get resolved, possibly in accompanying Guidance to the main Guidance on the implementation of the formal statutory requirements, or by widening the focus of the main Guidance. When a topic such as 'dry discharges' gets headlines in the popular news stories, the WCWC suggests very strongly that all the aspects it has referred to need drawing together to enable everyone to understand that achieving the goals needs more than just telling water companies what designs they should use for overflows. That requires Government itself to take swift action on several matters.

69 The WCWC pointed out that there also needs to be some recognition of the fact that dry day discharges may occur for unavoidable reasons even with the best investment and management. Negligent management and inadequate investment may well be contributing factors, apart from that there are many reasons why this might occur. Emergencies happen, which are a fact of life in sewers and treatment works such as power outages or third-party damage to sewers. How are these to be incorporated to avoid unnecessary accusations of culpability? This issue was reflected in the submissions on compliance with permits and penalties later in the year.

70 The WCWC was not certain that this draft Guidance will be the best response to the challenge by the Office of Environment Protection issued in December 2024 but suggested that updating the Guidance of 2018 might be a better way forward.

71 The 2018 Guidance needed updating, to reflect issues like the SODRP and changes to DWF profiling and the WCWC suggested that the whole topic needed to be reviewed, updated and clarified; and this Guidance redrafted as an update of the 2018 Guidance, as suggested.

72 In March 2025 the amended guidance was issued

<https://www.gov.uk/government/publications/storm-overflows-policy-and-guidance/storm-overflows-policy-and-guidance>

<https://www.gov.uk/government/publications/storm-overflow-assessment-framework-2025/storm-overflow-assessment-framework-2025>

73 Several of the points made by the WCWC were resolved but many were not, for example it states *'It does not apply to other types of assets or overflows including emergency overflows, due to the different applications of these assets and the different regulatory schemes which apply to these'*, and there does not appear to be any parallel Guidance. The WCWC commends further revision of this Guidance incorporated into the new water strategy and maybe the new water RPS.

74 It is also worth noting that as 1<sup>st</sup> April 2025, any new or replacement EDMs installed after 1 April 2025 should hold product certification under MCERTS.

<https://www.gov.uk/government/publications/mcerts-requirements-for-installing-and-using-event-duration-monitors/mcerts-requirements-for-installing-and-using-event-duration-monitors>

75 So in effect the monitoring of the most controversial discharges is being conducted under the principles of operator self- monitoring and the WCWC suggests that responsibility for the quality assurance of these processes should be vested in the Discharge Quality Assurance Manager.

### **Bag it and bin it: Nothing other than pee, poo, paper, and puke down our loos**

76 The wider issues of what should be disposed in lavatories and sustainable drainage system remain unresolved as referred to earlier.

77 The December 2025 EIP states that *'Defra has worked with the devolved governments to legislate to ban wet wipes containing plastic across the UK. The ban is expected to come into force in Spring 2027 and will reduce plastic and microplastic pollution, particularly in our waterways. The government are supportive of industry efforts to encourage the correct disposal of wet wipes, including Water UK's 'Bin the Wipe' campaign.'*

78 The draft Regulations for the ban on plastic containing single use wet wipes put forward in November 2025 have not been approved at the time of preparing this Overview. The broader issues addressed by WCWC and many other organisations have not been resolved. There has been a shift away from the concept of flushable products with a focus on the three Ps; pee, poo, paper, as advocated by the WCWC and many others. One wit in commenting on the WCWC stance, said that it ought to be the four pees: pee, poo, paper and puke!

<https://www.gov.uk/government/news/producers-urged-to-address-flushable-wet-wipes-labelling>

79 No progress appears to have been made on labelling and as the EIP states it is left to water companies to change societal habits (by comparison there is going to be national effort on communication on water efficiency and more of this later).

### **SuDS**

80 The EIP also includes a commitment '*Require standardised sustainable drainage systems (SuDS) in all new developments with drainage impacts and ensure sustainable maintenance arrangements are in place by 2029. Actions for commitment 24: Consult on a set of national policies to support decisions including those relating to SuDS. Responsible: MHCLG.*'

81 This is rather equivocal and needs a full commitment to the introduction of regulations. The WCWC notes that this requirement will not be implemented until the programme for new homes is well advanced, indeed almost complete.

### **The web of catchments and development planning**

82 These elements of the work in 2025 are presented as an interconnected web. Practical controlled water quality management is best focussed on river basins and catchments. Indeed, that is the very foundation of the water company and EA regions and required by the Water Framework Directive Regulations. These are affected by other factors such as land use planning and development controls; these are in turn affected by availability of suitable water resources and supplies and so fit together.

### **Catchments**

83 The issues around complications of control of sewer overflows as set out in the preceding paragraphs are natural elements of Catchment Management. During 2025 the WCWC continued with its active support for the concept. But there has been fragmented approach in policy development.

84 In March 2025 Defra consulted on a Land Use Strategy and the WCWC responded.

<https://waterconservators.org/wp-content/uploads/filr/3340/Mar-25-LAND-USE-Submission-to-Defra-consultation.pdf>

85 The WCWC supported the principles of the need for a sound Land Use Framework but suggested that a lot more work needs investing in these proposals. Amongst a number of points the WCWC stated that there is not enough alignment with the National Planning Policy Framework (NPPF). Nor enough recognition of the need to coordinate better with the high-profile issue of water management.

86 The WCWC pointed out that water is crucial to any exploitation of land. Integration of land use allocation in a framework with other key matters such as climate change and water and in particular water use allocation is essential – as advocated in the Foundation for Water Research (FWR) publication on the future of water resources.

<https://fwr.org/publication/future-of-water-resources/>

87 There was no reference to the use of Catchment Plans as set out in the 2023 Defra Water Plan or of River Basin Plans. There needed to be a driving concept of Integrated Natural Resources Management bringing land and water together. The use of land for 'nature-based solutions' in water management, including that of floods, should be considered as a land use category particularly with later commitment in the year to nature-based solutions

88 The WCWC has been advocating an Overarching Water Strategy for England and Wales for some time and was considering if the example of the concept of Land Use Framework could be complemented by a Water Use Framework into which all the current water initiatives including River Basin Planning could be located. This would be expressed now as advocating a new integrated approach which would bring together sundry elements as described earlier.

89 This thesis underpinned the submission to the Water Commission which is discussed later.

<https://waterconservators.org/wp-content/uploads/filr/3665/July-25-WATER-COMMISSION-Response-to-the-interim-report.pdf>

<https://waterconservators.org/wp-content/uploads/filr/4111/April-25-WATER-COMMISSION-Main-body-of-evidence-supporting-the-Submission.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3419/April-25-WATER-COMMISSION-Submission-of-key-points.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3437/April-25-WATER-COMMISSION-Submission-of-key-points-supplement.pdf>

90 The WCWC is pleased that the role of catchments is recognised in the final report of the Commission but reserves any views until the White Paper is published but whatever system emerges it must ensure that the integrated natural resources management principles of catchment management are preserved. It is also pleased that catchment planning is a strong element in the revised EIP.

## **Planning**

91 This stream of work was running in parallel to that arising from Planning Reforms, starting at the beginning of the year on nature recovery and the introduction of a new concept of Environmental Delivery Plans to which the WCWC responded.

<https://waterconservators.org/wp-content/uploads/filr/4112/Jan-25-PLANNING-Response-to-Defra-and-Ministry-Working-Paper-on-Nature-Recovery.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3226/Jan-25-PLANNING-Further-Response-to-Defra-and-Ministry-Working-Paper-on-Nature-Recovery.pdf>

<https://waterconservators.org/wp-content/uploads/filr/4110/July-25-PLANNING-Response-to-two-BNG-consultations.pdf>

92 The WCWC considered that the case for the proposals for new processes was not well made. There were many generalisations which need to be addressed, such as a more formal definition of environmental obligations. Many of the suggestions for the content of Delivery Plans would be better located in more formalised Catchment Plans. The formal system of approval of Delivery Plans would not necessarily speed things up or make technical burdens less. The proposals were coy about the concept of Delivery Bodies, particularly in relation to the established concept of Competent Authorities. The financial case was not strong nor demonstrated and the funding arrangements appear superficial and incomplete. The Working Paper needed to be clarified. The intention was to introduce these via the Infrastructure and Planning Bill which was tabled in March 2025.

93 The concept was embodied eventually in the Infrastructure and Planning Act, given Royal Assent in December 2025.

<https://www.gov.uk/government/publications/nature-restoration-fund-implementation-plan/implementing-the-nature-restoration-fund>

<https://naturalengland.blog.gov.uk/2025/12/18/royal-assent-natural-england-and-the-planning-and-infrastructure-act/>

94 The WCWC remains concerned about the juxtaposition of these Plans and Catchment Plans and is not clear how this will work within the arrangement proposed by the Water Commission report and awaits the White Paper. The WCWC notes that the EIP does not link the EDPs with the nutrient reduction commitments of the EIP.

95 The WCWC has suggested that a merger of the work of the Environment Agency and Natural England would help address some of the practical issues and cited the work of Natural Resources Wales.

96 To complete this section on planning, in December 2025, following the assent of the Infrastructure and Planning Act, the Government has consulted on further revision of the NPPF to which the WCWC will respond.

<https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

<https://mhclqmedia.blog.gov.uk/2025/12/17/coverage-of-our-major-consultation-to-the-national-planning-policy-framework/>

97 The current NPPF was introduced a year ago and in the consultation on that the WCWC responded by urging that it be better focussed on water. The WCWC has not had an opportunity to study the current proposals, and the consultation closes in March, but the WCWC will be seeking focus on the same water issues as before.

98 In July the Defra consulted on changing the rules for BNG to which the WCWC responded and suggested that a more balanced concept would be to establish a basic principle should be that no development site should cause a net loss and that the bedrock ought to biodiversity net zero. However, Defra pushed on with the exemptions concept and published the latest guidance immediately following the publication of the consultation on the NPPF reforms.

<https://waterconservators.org/wp-content/uploads/filr/4110/July-25-PLANNING-Response-to-two-BNG-consultations.pdf>

<https://defraenvironment.blog.gov.uk/2025/12/17/planning-reforms-delivering-homes-supporting-farmers-and-protecting-nature/>

99 The WCWC discovered that the term Biodiversity Net Zero has been morphed into biodiversity net zero means achieving a state where development leaves nature in a better condition, ensuring a 10% (or more) increase in biodiversity value after a project, working alongside traditional climate net-zero goals by integrating nature-based solutions like reforestation and habitat restoration for both carbon sequestration and wildlife enhancement, recognizing that protecting ecosystems (peatlands, woodlands, saltmarshes) is crucial for climate resilience and storing carbon, not just reducing emissions. It links climate action with ecological restoration, using strategies like Biodiversity Net Gain (BNG) to create a win-win for the planet.

## **Forever Chemicals**

### **PFAS**

100 PFAS 'forever chemicals' pollution of rivers is transitory but that of soil is long term accumulation as explained in subsequent sections. They are critical in determining the status of controlled waters in catchments under the Water Framework Directive Regulations and river basins criteria; there was a great deal of discussion in 2025 on these topics with rising concerns. The WCWC expressed its views on this in previous years. The WCWC also responded to an EAC call for evidence, and in a Thinkpiece on bioresources, following some ill-informed press reports on the regulation and impact of biosolids in agriculture (and microplastics as well) provided some thoughts on PFAS. Text from these is used in this Overview to explain the problems and suggestions for ways forward.

<https://waterconservators.org/wp-content/uploads/filr/3509/May-25-PFAS-Response-to-the-EAC-Call-for-Evidence.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3820/Sept-25-BIORESOURCES-Thinkpiece.pdf>

<https://www.theoep.org.uk/sites/default/files/reports-files/Cover%20Letter%20and%20Written%20Evidence%20for%20EAC%20PFAS%20Inquiry.pdf>

<https://www.theoep.org.uk/sites/default/files/reports-files/Cover%20Letter%20and%20Written%20Evidence%20for%20EAC%20PFAS%20Inquiry.pdf>

<https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water>

101 The WCWC did not offer any insight into the toxicology of these substances, it did recognise the concerns being expressed about their presence in the environment, and in particular, the consequences for human health. But in overall terms is concerned that the water companies and their regulators are taking the brunt of criticism for what are much wider societal problems.

Sewage sludge on farms under scrutiny as poll backs water firm accountability – FarmingUK News

102 The WCWC has before explained, and repeated in the response to the EAC, the focus on PFAS in 2023 Defra Plan for Water. This recognises that almost all of the failures of chemical status of controlled waters under the Water Directive Regulations of 2017 are caused by uBPT substances (ubiquitous, bioaccumulative, persistent, toxic) forever chemicals, mostly PFAS.

103 The EA response to the Plan gives some insight, where around 35-40 years may be needed to achieve resolution of the PFAS problem. Dealing with PFAS, other than PFOS and PFOA, and PBDE, may prove to more intractable. This assumed that bans on the use of these substances would be introduced by Government would be introduced. The length of time is necessary because PFAS are in the water environment as:

- as legacy contaminants
- being added now from legacy products, which can be used after manufacture and retail are banned, via wastewater streams
- arising from future uses, the more extensive and rapid the bans of use, the less will arise

So, with better environmental data and forecasting of bans it should be possible to model a profile.

104 The media focussed on the issue during the year.

<https://www.theguardian.com/environment/2025/jul/11/toxic-pfas-above-proposed-safety-limits-in-almost-all-english-waters-tested>

The WCWC observed that media and political coverage can conflate issues; the zero chemical status issue was woven together with concerns about storm overflows from sewers to create images of rivers polluted with 'chemical cocktails' from sewage. There needs to be two formal metrics on chemical status of rivers with and without uBPTs. The WCWC has suggested this previously

105 The WCWC supported the initiative of the EAC Inquiry to look at regulatory systems. Once more, the approach to the problem, as in other environmental problems, is complex and often difficult to unravel. To facilitate the modelling, the WCWC asked...how do PFAS get into the water environment other than sewage effluent and what is their contribution to WFD chemical status failure? Action is needed at a national level led by Defra to answer this question

106 Concerns were extended on drinking water:

<https://www.dwi.gov.uk/pfas-and-forever-chemicals/>

<https://www.bbc.co.uk/news/articles/c9q1nzyzyjeo>

107 The Drinking Water Inspectorate (DWI) issued updated guidance in March 2025 for water companies to monitor dozens of types, setting a guideline of 0.1 micrograms per litre (µg/L) for 48 specific PFAS, with action needed for levels exceeding 100 nanograms per litre (ng/L) in treated water. In the last four years, 1.7 million tests for individual forever chemicals have been carried out across the network. At least 9,432 of those recorded PFAS levels

above the level which the DWI says could constitute a potential danger to human health, external. When a test result is above or likely to breach this level - set at 0.01ug/L - (micrograms per litre) the DWI issues enforcement notices to water companies requiring action to be taken to ensure water is safe.

<https://www.dwi.gov.uk/what-we-do/annual-report/drinking-water-2024/drinking-water-2024-summary-of-the-chief-inspectors-report-for-drinking-water-in-england/perfluoroalkyl-and-polyfluoroalkyl-substances-pfas/>

108 And there were ill-informed press reports on bioresources partly driven by concerns over PFAS (and microplastics) in biosolids used in agriculture continuing to December 2025. These problems are somewhat different in that they are focussed on accumulation of these substances in soil, but the press reports are focussed on immediate toxicity in the biosolids themselves as well as long term accumulation.

[Sewage sludge on farms under scrutiny as poll backs water firm accountability - FarmingUK News](#)

109 The issue is not immediate toxicity of biosolids, but the unacceptable accumulation in soils arising from repeated applications over many years. The WCWC pointed out the difference between these long- term and the short-term issues. It cannot answer the question about risks, but the PFAS have been used for some time and so with the benefit of lowering contributions in future it must be possible to evaluate the impact of the past with reducing uses in the future, contrary to the current media narrative.

110 It would be very helpful if a modelled profile could be developed to predict how the quality of bioresources, for example, will change over the predicted 40-year period. But the historic contamination if soil will persist, unlike water. Much more information is needed on the role of PFAS in soil with respect to biosolids use so that the appropriate quality criteria can be agreed. The WCWC suggested that the Standing committee of Analysts SCA produces standard methods.

111 Compliance with environmental goals, (including drinking water quality), will be achieved by significant investments, for the foreseeable future, by the Water Companies, to deal with legacy issues and the consequences of uses of PFAS exempted in future from any ban. The water sector is working actively on this, backed by Ofwat.

<https://www.bbc.co.uk/news/articles/clydd630pxzo>

112 If it is found that there are advantages in maintaining the uses of certain critical products for the wider community and that causes the need for expensive water and sewage treatment processes, there is a circularity in the argument that society benefits from those substances so it must pay to avoid consequences. This must be accepted in future Price Reviews by future economic regulators.

113 The WCWC supported the initiative of the EAC Inquiry to look at regulatory systems. Once more, the approach to the problem, as in other environmental problems, is complex and often difficult to unravel. Progress is slow. The OEP noted in its submission to the EAC that there was no specific commitment in the previous EIP to this issue. That omission continues in the current EIP.

<https://www.theoep.org.uk/sites/default/files/reports-files/Cover%20Letter%20and%20Written%20Evidence%20for%20EAC%20PFAS%20Inquiry.pdf>

114 As explained earlier the Government has a major role itself to help solve the problem. They are included in the programmes of REACH

<https://www.fieldfisher.com/en/insights/pfas-uk-regulatory-snapshot>.

115 The uses of PFOS and PFOA (also a PFAS) have been heavily restricted for some time and were banned as from July 2025 for use in firefighting foams. The WCWC supported the initiative by Defra/HSE to extend the ban on the use of all PFAS in firefighting foam, as referred to above, but would prefer the consultation period on this to be swifter and to extend to other uses.

<https://consultations.hse.gov.uk/crd-reach/pfas-in-firefighting-foam-fff-restriction-proposal/>

116 The WCWC urged close co-operation by the UK with the EU on regulation and research, not only to benefit from a wider effort but also to recognise the implications for future trading. Thus, it supported as much effort as possible into coordinated research to provide the evidence for action. It also supported the initiative for a Europe wide ban certainly on the production and uses of non-critical PFAS as a minimum.

The WCWC has noted progress in France, for example.

[French ban on 'forever chemicals' in cosmetics and clothes to enter into force - France 24](#)

117 There needs to be an urgent update of the 2023 Water Plan, but this was not addressed by the 2025 EIP. The WCWC advocated an overarching water use strategy, to embrace a PFAS action plan, where progress should be reported annually. The WCWC suggested a distinct approach for bioresources in the Thinkpiece which must be included.

118 Consideration needs to be given to how PFAS can be regulated by water companies in trade effluent consents and how the 'polluter pays principle' applies. Part of government intervention could be to prescribe PFAS in the Environmental Protection (Prescribed Processes and Substances) Regulations 1991. This will have to be led by Defra.

<https://www.legislation.gov.uk/ukxi/1991/472/made>

<https://waterconservators.org/wp-content/uploads/filr/3820/Sept-25-BIORESOURCES-Thinkpiece.pdf>

## **Microplastics**

119 The WCWC addressed concerns specifically in the context of bioresources, although in doing so gave a brief overview of the broader implications. This Overview focuses on that.

120 In many ways, the issues mirror those of PFAS. Unlike PFAS they can arise in the water environment as a result of material degradation, for example up to 75% of microplastics in sewage can come from textile fragments. Microplastics have been banned in certain products since 2018 but more needs doing for those which remain in use.

121 Again, much of the public dialogue focuses on what water companies should be doing about the problem.

[Sewage sludge on farms under scrutiny as poll backs water firm accountability - FarmingUK News](#)

122 The WCWC has pointed out that removal from water and wastewater adds extra complexity and cost and that resolution of the problem is a wider responsibility led by Government taking action. There is a paradox insofar that removal of microplastics from sewage to meet effluent targets will most likely lead to increased presence in bioresources and an exacerbation of problems with their use. So, innovation needs a linked approach of treatment of sewage and bioresources. There is an air of acceptance that this might be the cause of demise of existing bioresources practices, with thermal destruction being cited as the way forward as for PFAS. This issue has been a big driver in the Ofwat Innovation Programme and is discussed subsequently. The Thinkpiece pointed out the cost of this:

[https://bluewaterbio.com/filterclear/?gad\\_source=1&gad\\_campaignid=1366026866&gbraid=0AAAAADgdjvAtQW2sfWWRyErleslik-0VE&gclid=Cj0KCQiAx8PKBhD1ARIsAKsmGbfeAM6iNH8qbrl9J1EkdfLXaQteIJI1OcGpyQTHIVIXHpbHlfZLSj0aAom1EALw\\_wcB](https://bluewaterbio.com/filterclear/?gad_source=1&gad_campaignid=1366026866&gbraid=0AAAAADgdjvAtQW2sfWWRyErleslik-0VE&gclid=Cj0KCQiAx8PKBhD1ARIsAKsmGbfeAM6iNH8qbrl9J1EkdfLXaQteIJI1OcGpyQTHIVIXHpbHlfZLSj0aAom1EALw_wcB)

123 Once more the WCWC urged more leadership by Government in tackling the problem, an example being making the prescription of microplastics in trade effluent consents, as discussed earlier for PFAS.

124 Microplastics have been considered in the context of UK REACH, however, while intentionally added microplastics were listed as a priority area for the 2023 to 2024 UK REACH work programme, the most recent policy paper published on 31 July 2025 setting out the English, Scottish and Welsh Governments' priorities for UK REACH makes no mention of microplastics. The HSE's Work Programme for 2025-26, published in July 2025, also does not refer to microplastics. In May 2025, the UK Government published findings from a research project assessing the emissions of intentionally added microplastics (i.e., excluding those from plastic debris and textiles) in the UK and evaluating potential 'risk management options' (RMOs) to mitigate environmental and health impacts, including under UK REACH.

<https://www.fieldfisher.com/en/insights/how-are-microplastics-regulated-in-the-uk-and-european-union#:~:text=In%20May%202025%2C%20the%20UK,to%20determine%20future%20policy%20directions.>

125 The 2023 Water Plan states that the Government "expects industry to develop low cost, effective microfibre filters on washing machines and encourage their effective use". No apparent progress has been made on this voluntary approach. The WCWC highlighted the Private Member's Microplastics Filters (Washing Machines) Bill introduced in late 2024, currently awaiting the Second Stage due for May 2026. Defra support would be welcome. This could enable a structured way forward for a diminishing problem akin to that proposed for PFAS. However, this is not without its criticism, one being that the filter debris must be managed and disposed carefully by members of the community.

Microplastic Filters (Washing Machines) Bill - Parliamentary Bills - UK Parliament

126 Much more information is needed on the ubiquitous presence of microplastics in soil and the consequences for soil quality so that appropriate criteria can be agreed and used. There are no official methods of analysis and again the WCWC urges the Standing Committee of Analysts CA to act urgently and produce standard methods.

127 On the basis of available information, the WCWC was able to suggest some elaboration of the EA model for PFAS in soil, it was unable to do so for microplastics as there are no official plans for reduction so there is no 'end game' as there is for PFAS. The WCWC did observe that this, again, is a problem of long-term accumulation and not immediate toxicity.

## **Web of Bioresources**

### **The roots of current practice**

128 The WCWC was concerned about the continuing narrative on bioresources in the media and the poor responses to that. To fill that communications gap, it produced a Thinkpiece in September and the highlights of this are used as a basis for this Overview, updated where necessary. The critical narrative continued until December 2025. In view of the damage that this gap is causing, this Overview offers a longer insight. The WCWC notes that until recently Defra and its successors had supported the agricultural use of bioresources as the best practical environmental option and indeed this is expected in the UWWTD Regulations. The media have focussed especially on PFAS and on microplastics and have not understood the extent of controls and development in place now.

129 In making its comments, the WCWC drew on the experiences from the 1980s in laying the foundations for current practices and regulation. Many of the lessons and evidence from the 1980s, which still underpin current regulations, have been forgotten and even paperwork had been lost. However, an archive has been established under the auspices of the Biosolids Assurance Scheme.

130 The WCWC noted that for many decades biosolids (appropriately treated bioresources) have been used successfully in agriculture and are now the overwhelming major route for managing bioresources with increasingly assured practices. This has been a contribution to the circular economy and to the mitigation of climate change, but big changes are in train. The Water Companies and predecessors have managed sewage sludge (now known as bioresources) in several ways. They now rely principally on the agricultural use of appropriately treated products, known as biosolids (about 90% of all bioresources are managed in this way). The cost of this is significant, incurring up to 50% of sewage treatment costs. The value of the nutrients to agriculture is substantial, with the principal value being in the addition of organic matter for soil conditioning. This recycling is invaluable as a contribution to climate change mitigation and the circular economy.

131 Setting aside the rising concerns about microplastics and PFAS, there is no evidence that if the processes set out by the Biosolids Assurance Scheme are followed, that there is pollution of water, soil or plants. But there is no place for complacency. The BAS involves the concept of HACCP (hazard analysis and critical control point analysis), and work is continuing on hazards, contrary to the claims of the media.

### **Changes to approach**

132 Ofwat now sees that bioresources have much greater market potential to exploit innate resources value than current practices for using biosolids. The Thinkpiece described practical risks to future use of biosolids. The EA had been restricting times of application to agricultural land via the Farming Rules for Water and these concerns about the impact of PFAS and microplastics on soil and crop quality as described earlier. These were making operational practice more difficult.

133 Contrary to the descriptions in the media there have been, and are, significant efforts to understand the nature and extent of the problems caused by them and the consequent implications for bioresources management. And coupled with the technical implications of wider market opportunities, the water industry had responded with a UK National Bioresources Strategy in September 2023. This formed a framework for bioresources in Company Plans for PR24 and started to prepare the way for PR29. Some alternative strategies were contemplated as responses if adverse attitudes to use made operations more difficult.

134 Water Companies have developed, with Ofwat, an extensive innovation programme. Any change of option from biosolids use will inevitably need a transition plan and will not be achieved overnight. The WCWC highlighted the problems of a diminishing landbank for biosolids use arising primarily from the Farming Rules for Water and even with a more informed approach to application per se the administrative burden on farmers discouraged use.

135 The EA had wanted to extend already extensive Standard Rules permitting for many aspects of bioresources management to include biosolids use in agriculture, and this is set out in the Strategy for the Safe and Sustainable Use of Sewage Sludge, in August 2023. The WCWC now notes that the December 2025 EIP refers to the Water Commission Report and ignores the EA strategy:

*“Review the regulatory framework for sewage sludge spreading to agricultural land to ensure it effectively manages the risks to the environment and health. Action for commitment 38: Consider the recommendation for reform of sewage sludge regulations made by the Independent Water Commission. Outline next steps as part of Defra’s wider work on water reform.”*

136 This threat to biosolids operations was recognised by Defra in a study published in January 2025: *Option appraisal for intentionally added microplastics Final report Defra January 2025 Eftec and UK Centre for Ecology and Hydrology.*

<https://www.fidra.org.uk/news/intentionally-added-microplastics-options/>

*It says: “Reducing recycling of sewage sludge to land by 95% (RMO 3A) and 50% (RMO 3B) are also relatively cost-effective measures, at £23 per kg and £73 per kg respectively, which falls within the mid to lower range of the cost-effectiveness benchmarks identified in literature. Furthermore, the co-benefits of reducing exposure to other chemicals in sewage sludge (e.g., secondary microplastics, PFAS, and pharmaceuticals), are likely to outweigh the primary benefits of reducing intentionally added microplastics for these measures. Even though these co-benefits cannot be fully quantified, it indicates that RMO 3A-B should be considered in a broader environmental policy context. ... Lastly, conducting research into potential impacts from exposure to chemicals contained in biosolids is pertinent to understanding the potential co-benefits of reducing recycling of sludge to land.”*

PRIMARYMICROPLASTICS\_OPTIONAPPRAISAL\_FINALREPORT%20(1).PDF

137 This does not take account of the immediate availability of incineration capacity and experience shows that even if incineration is considered as a feasible option technically and economically, it will take many years deliver, not least to the enormous public opposition to incinerators, which is even more vocal than the opposition to biosolids use. The alternative way forward to cope with PFAS and microplastics in untreated bio resources would appear to be thermal destruction and the production of biochar and the transition to this technology would take some time.

### **Problems with progress and communications**

138 The problem has been slow progress in developing the EA strategy and in taking the PR29 Action Plan, for bioresources, forward. And the fact that these two policy development streams do not feel well connected.

139. Communication by the sector on progress and in response to the media has not been as good about as it should have been. And the risks elaborated above have been

exacerbated by the general distrust by the public on all things to do with sewage treatment, bioresources are a consequential casualty. This has given space for ill-informed criticism and demands for immediate abandonment of current practices, which needs sorting out urgently. There is plethora of nomenclature which needs sorting out; the this has caused some sarcastic remarks in the media. The effort being made on research and innovation needs much more publicity.

### **One stop shop, the way forward**

140 There is a clear difference between regulation and strategy albeit that they are connected closely. The WCWC argued that all of the work of the EA, Defra, Ofwat and Water UK should be brought together into a single focus, consistent with the aspirations of Government for regulatory streamlining and waits to see what the outcome on the implementation of the recommendations of the Water Commission will be. This would recreate the harmonised approach of the 1970s and 1980s. The WCWC agrees with the overall conclusion of the Independent Water Commission and of CIWEM for more focus and an updating of regulations, although not necessarily with their routes to that conclusion. As cited right at the start of this Overview, the merging of environmental and economic regulation should provide, at least, one 'hymn sheet'.

141 There is some dissonance on the way forward. Is it to maximise the commercial value of the resources content of bioresources or is it to find other ways of disposing / using the resources content due to the presence of PFAS or is it both? The WCWC advocated both, a mixed economy. The balance is moving towards finding other ways of treating the bioresources in place of biosolids use but not as a complete replacement. With a need to 'keep it simple' A quote from a contributor to this Thinkpiece was 'deployable, sustainable and resilient'. If a change of strategy on agricultural use of biosolids is needed, current practice cannot be stopped overnight. A clear transition plan would be needed which would not be an instant overnight process.

142 The WCWC accepted that the way forward will include streamlined 'fit for purpose' set of integrated Standard Rules Permits as an ideal candidate for regulatory streamlining as envisaged by the Government. and expects that the whole package of several rules will be brought together with 'areas of deployment' being a crucial factor. It must be an enabler of biosolids use and be part of a much more diverse bioresources economy.

143 This should maintain the concept of supplier self-monitoring suitably updated to reflect contemporary quality assurance requirements. This must take account of criteria for PFAS and microplastics in soil which are needed urgently to plan ahead as discussed earlier. It now hopes that the intention of Defra in the December 2025 EIP is to follow that set of principles, but this is still just part of a wider strategy.

144 The EIP has a separate target for a review of the Farming Rules for Water, which the WCWC hopes will be harmonised with the 'Sewage Sludge Framework' and, to assist with the administration of these Rules, the WCWC suggested a prescribed role for Land Agents in the administration of the Rules for biosolids on farms.

145 As a tangential observation, if Standard Rules permitting is introduced, there will need to be a complex set of compliance criteria as discussed earlier in the section on compliance.

146 In urging the re-creation of a single national focus, the WCWC included the Standing Committee of Analysts and institutions conducting crop trials. Standard Analytical methods are needed.

147 The WCWC recognised the urgency of determining the ways forward which take account of PFAS and microplastics and set out some suggestions. It is of a view that Government must make a more proactive contribution on behalf of the wider community to restrict uses. These are social problems and cannot be 'off loaded' on to the water sector to deal with. The WCWC supported current actions being taken by Government banning of uses of PFAS. Once again, the WCWC reiterates that as with so many other aspects of water management, the Government must take its broader responsibilities more proactively, for example in examining the practicality of regulation of washing machines for microplastics discharge and being more proactive with the regulation of the uses of PFAS and microplastics. Regulatory inaction is part of the problem, and all parties would welcome a reduction of more attention of uncertainty, for example when modifying permitting regulations. This was discussed under earlier sections

148 The long-term way forward will be in the hands of whatever Government decides to implement on the Water Commission report and the WCWC hopes that it will heed the messages of this Thinkpiece. However, the whole topic cannot wait until this happens and some *pro tem* measures will be necessary to avoid more problems

### **The web connecting water resources and the consumption of water particularly by new homes**

149 The following submissions and Thinkpieces in 2025 revolved around the central roles of available water resources and their relationship with the new homes programme. Previous sections of this Overview have referred to the new planning legislation and how this will facilitate the speedier provision of new reservoirs but at the same time put extra strains on water services. There is a mismatch insofar that new reservoirs will take many years to be operational even with speedier planning, but the impact of new homes is almost immediate.

150 The Government programme of building 1.5 million new homes by the end of this Parliament highlighted the shortfall in reservoir capacity and this was exacerbated by the hot fry Summer. The Infrastructure and Planning Act 2025 was passed to speed up the planning processes. There is little recognition that faster delivery will mean faster impact on the treatment and reticulation systems. This iterates back to what the WCWC has said about penalties for water Companies.

151 It was already foreseen that water resources would be stressed even before the new homes programme started. Part of the response was to establish the water efficiency roadmap with statutory targets for water consumption under the Environment Act 2021. This has led to proposals for a revision of Building Regulations and some thoughts on charging systems and an intensification on the programme for universal metering.

### **Circular water economy**

152 Various Consultations have referred to the water circular economy and the contribution that re-use can make, and more consultations are expected in pursuit of amendment to Building Regulations. The WCWC provided a Thinkpiece in February to the UK Water Partnership on this topic. Underpinning a number of the consultations was the notion that direct reuse and recycling will be a major contributor to conserving water resources ranging from macro asset schemes to the provision of micro schemes in new homes as set out in the future of Building Regulations.

<https://waterconservators.org/wp-content/uploads/filr/3299/Feb-25-CIRCULAR-WATER-ECONOMY-Thinkpiece-provided-to-the-UKWP.pdf>

<https://www.gov.uk/government/publications/water-recycling-for-public-water-supply-environment-agency-position-statement/water-recycling-for-public-water-supply-environment-agency-position-statement>

153 The December 2025 EIP does not really address this specific issue, but it is committed to investigate dual supplies and water reuse in homes, it does not refer to the services already in place by water companies.

154 In its this Thinkpiece for the UKWP, the WCWC offered the insight that the concept of the Circular Water Economy (CWE) lies at the centre of a series of overlapping spheres of influence. Circular Economy, Water Resources, Planning and Industrial Strategy, as examples, and like so much of current government policy development, it is influenced by disparate and diverse initiatives. The Circular Water Economy must be part of the Overarching Water Strategy for England and Wales.

155 In producing the UKWP Thinkpiece and this Overview and considering how all the pieces of initiatives fit together, the WCWC observes that one problem is the definition of focus for the concept of the Circular Water Economy. It is often almost synonymous with the broader concepts of water and wastewater management. Should it really encompass all the concepts of catchment management or conversely be a feature of catchment management? Should it embrace all the concepts of water efficiency or be embedded in them? How do the circles of influence overlap? The WCWC suggests that definitions need to be more rigorous

156 This Thinkpiece distinguished what is normally thought of as the Circular Water Economy (CWE) as effluent re-use and water use efficiency, from water as part of the concept of the Circular Economy. The WCWC suggested that a more effective location of CWE is in water resources planning and the National Water Resources Framework. The term CWE needs splitting into two parallel but conversant streams; Utility CWE (UCWE) and Industrial and Commercial (ICCWE) as being more effective.

157 ICCWE would fit in with the evolving Industrial Strategy. Specific of immediate high-profile interest embrace recycling of industrial waters in the AI driven economy of giga factories and production of hydrogen which are becoming more demanding. Water use must be considered a sector in the industrial strategy. Which it is not. The WCWC has suggested that the new giga and hydrogen production economies could be located on coastal areas to use seawater and this could have the benefit of economic resurgence of coastal communities.

<https://waterconservators.org/wp-content/uploads/filr/3299/Feb-25-CIRCULAR-WATER-ECONOMY-Thinkpiece-provided-to-the-UKWP.pdf>

158 The focus on re-use continued with the Defra consultation on changes to Building Regulations discussed below. There seems to be a continuing lack of immediate understanding that a considerable amount of treated sewage effluent is recycled indirectly, via surface water abstraction of rivers with sewage effluent content, which the WCWC has pointed out a number of times. The EA position statement in October does recognise this.

<https://www.gov.uk/government/publications/water-recycling-for-public-water-supply-environment-agency-position-statement/water-recycling-for-public-water-supply-environment-agency-position-statement>

159 However there is a difference between macro infrastructure assets, including public reticulation and micro schemes installed within homes.

## Water efficiency

160 As part of the drive to conserve water resources, the Environment Act 2022 and the subsequent EIP, defined a statutory programme to reduce water consumption called the Water Efficiency Roadmap. This is also targeted in the latest Dec 2025 EIP. This required amending Building Regulations to ensure that new properties do not contribute unnecessarily to the problems of water resources and that has always been supported by the WCWC.

161 In December 2025, Defra consulted on proposals for such change. Further consultations on other aspects of the Regulations are proposed on other aspects of water management such as reuse. The WCWC supported these in principle but observed that these were an example of 'silo evolution' of Regulations and ignored the existing Ofwat scheme. The WCWC took advantage of the opportunity to address the issue of how to reduce water consumption from existing properties as a very important part of the Water Efficiency Roadmap.

<https://waterconservators.org/wp-content/uploads/filr/4071/DEC-25-WATER-EFFICIENCY-Response-to-Defra-consultation.pdf>

162 Whilst the section on Wider Actions in the Consultation does give passing reference to the work by Ofwat, no mention is made of the Ofwat Incentives Scheme to encourage developers to install more efficient fittings.

[Environmental-Incentives-Common-Framework---English-New-Connection-Rules---effective-April-2025.pdf](#)

163 If this Ofwat/water company incentives scheme is not withdrawn it would address very narrow bands of further water efficiency supported by incentives and it would be complicated. The Ofwat scheme is based on evidence of a wide range of stakeholders and works well and so the Building Regulations would be better based on 100 l/p/d. There is every practical reason to make the Building Regulations Optional Standard 90 l/h/d for streamlined regulation and to reflect current practice. The Ofwat scheme could continue until further statutory obligations are introduced such as the introduction of Mandatory SuDS which can be removed in due course where appropriate. There are no cost implications for water companies beyond those agreed for PR 24, indeed there could be savings which the WCWC suggests below could be invested for customer benefits.

164 The WCWC supported the changes to the Regulations with the caveat that they are brought into line with the Ofwat incentives scheme

165 In addition, the WCWC recommends that a review of the Water Fittings Regulations 2016 to make sure that they are fit for purpose with the new Building Regulations. The WCWC submits that the suggestions it is making should be addressed in the review of the EIP. It would also make sense, in terms of more efficient regulation to bring the Ofwat scheme and the Building Regulations into line and this would be consistent with the drive for more efficient regulation

<https://www.gov.uk/government/news/new-common-sense-approach-to-environmental-regulation-to-support-new-homes-drive>

166 The WCWC understands that this Consultation is a further step in a committed course of action it is anxious that any delays in the building programme must not be attributed to this

aspect of water services delivery and their regulation. The cost of implementation of the new regulations should not exceed the value ascribed in PR24 to the Ofwat Incentive Scheme. The WCWC noted that the provisions of the changes have already been anticipated.

<https://waterconservators.org/wp-content/uploads/filr/4071/DEC-25-WATER-EFFICIENCY-Response-to-Defra-consultation.pdf>

#### Plans for 720 Beccles and Worlingham homes assessed | Beccles & Bungay Journal

167 The WCWC entered into a dialogue with the New Towns task force and submitted a Thinkpiece to its deliberations in July. It could not offer any advice on location but did provide insights into some of the issues highlighted in this Overview.

<https://waterconservators.org/wp-content/uploads/filr/3596/July-25-Briefing-on-a-Thinkpiece-on-New-Towns-and-Water.pdf>

168 It pulled together a framework of criteria on the issues outlined in this Overview for an ideal home design and suggested that these might help to select the best locations for development. This framework was later updated to take account of the proposed changes in Building Regulations and the WCWC amendments of them were included in the submission in response to the proposed changes to the building regulations:

#### For homes in Flood Risk Areas

Buildings in flood zones should be constructed with flood-resistant materials and raised floor levels to protect against flooding.

Water fittings for 105 l/p/d, optional for 90/h/d with incentives for less than 90 l/p/d as per the Ofwat scheme

Ordinary water meters, maybe with a new incentive to install smart water meters

Compulsory enhanced SuDS with no incentives as offered in Company schemes

'Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

#### For homes in Water Stressed Areas:

All water fittings for 90 l/p/d with incentives offered for less where needed in extremis

Smart water meters

Voluntary SuDS, with incentives as per Company schemes

'Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

#### For homes in Stressed Catchments, apart from water stressed, e.g. nutrient neutrality and Stressed Drainage Plans

Water fittings for 105 l/p/d with options for 90 l/p/d and incentives for less

Ordinary water meters, maybe with a new incentive to install smart water meters

Compulsory enhanced SuDS, no incentives as per water company schemes

'Bag and bin it' compliant bathrooms and toilets required

#### For all other homes

Water fittings for 105 l/p/d with no incentives envisaged for less

Ordinary water meters, except shared properties with smart water meters, with a new incentive for smart water meters in other properties

Voluntary SuDS with incentives, as per water company schemes

Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

169 The Task Force reported in September

[https://assets.publishing.service.gov.uk/media/68d694b79cb44667f7a1cee7/New\\_Towns\\_Taskforce\\_Final\\_Report.pdf](https://assets.publishing.service.gov.uk/media/68d694b79cb44667f7a1cee7/New_Towns_Taskforce_Final_Report.pdf)

It is hoped that the locations selected will enable the criteria set out by the WCWC to be complied with.

170 The WCWC has pointed out the new homes programme is going to confront the demands for improved water services and there are numerous examples of water getting in the way.

[Tens of thousands of new homes blocked by failure to build wastewater capacity](#)  
[A hidden housing hurdle: How sewage capacity is stalling 30,000 new homes - and how it could get much worse | Building Planning Water Resources for New Development | WildFish](#)

### **Existing homes**

171 Reducing water consumption from existing homes needs a lot more attention. If the suggestion outlined above is followed the money released from the current incentives scheme could be repurposed to grant aid existing customers to retrofit more efficient fittings. The WCWC draws attention to similar notions in energy management and of course to the lead pipe replacement scheme. Such a grant scheme could become part of a revised Ofwat incentives scheme. A popular alternative would be to repurpose the money to support a rekindled 'dripping tap service', once the pride of water companies but not delivered now.

172 The WCWC also explores the Ofwat Water Efficiency Campaign concepts in relation, not just to existing customers (which is outside the scope of this Consultation), but in relation to the provision of information to new customers on the continuing diligent use of these newer fittings and could embrace the grant system for existing customers. It notes progress. Reducing consumption cannot be left just to Ofwat and the water companies and the WCWC urged Defra to take more national leadership, including making the installation of water meters even more compelling.

### **Charges**

173 Behind the dialogue during the year was the notion that the process for charges could be structured in a way which better supported the least advantaged customers but also help to reduce consumption. It has repeated its insights from 2024. Concepts like rising block tariffs favour smaller occupancy ratios and the WCWC has expressed concerns it has and continued its support for trials. It also noted the evolution in the energy sector towards tariffs without standing charges and suggested that the water sector might consider investigating the same.

### **The Independent Water Commission and the forthcoming White Paper**

174 The WCWC made submissions to the review which reflected many of the points outlined in this Overview. It now reserves any further submissions to those in response to the White Paper

175 Throughout this Overview there are observations on the relevance of specific points which chime with the Final Report such as operator self-monitoring

WCWC would like to reiterate principal points it has made which are relevant

- There is a need for an overarching strategy first strategy before delivery and consequent governance
- What is needed more than unified governance is a unified 'hymn sheet' following on from a single strategy
- Water management is something for the whole community; the Government must execute its own role on behalf of that community with the same speed and focus as is expected of the water sector
- There must be clear space between the decisions on what is desirable in environmental terms and what is affordable in economic terms
- The principles of integrated natural resources management must be maintained in terms of regulation as well as practical delivery
- On this basis River basins and Catchments must be the central drivers and embrace all initiatives but as part of an integrated approach not separated
- The number of environmental regulators needs reducing
- The Environment Agency has operational responsibilities, as well as being a Regulator
- Flood risk management and land drainage need to be coupled together as part of integrated basin and catchment management

<https://waterconservators.org/wp-content/uploads/filr/3300/Feb-25-MONITORING-Submission-to-WATER-COMMISSION.pdf>

<https://waterconservators.org/wp-content/uploads/filr/4111/April-25-WATER-COMMISSION-Main-body-of-evidence-supporting-the-Submission.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3419/April-25-WATER-COMMISSION-Submission-of-key-points.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3437/April-25-WATER-COMMISSION-Submission-of-key-points-supplement.pdf>

<https://waterconservators.org/wp-content/uploads/filr/3665/July-25-WATER-COMMISSION-Reponse-to-the-interim-report.pdf>