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WORSHIPFUL COMPANY OF WATER CONSERVATORS

Promoting a diverse and sustainable environment

BRIEFING ON THE OVERVIEW OF CONTRIBUTIONS AND KEY MESSAGES IN 2025 22nd January 2026

Plan for the Future, Learn from the Past, Act Now

Purpose and Scope

- 1 The Worshipful Company of Water Conservators (WCWC) is a City of London Livery Company focused on the long-term sustainability of water resources and the wider environment.
- 2 Its members include senior professionals from water companies, regulators, environmental science, engineering, and related fields. Collectively, they bring deep experience across policy, regulation, asset delivery, and operational management.
- 3 Since early 2022, the WCWC has responded to numerous government consultations, calls for evidence, and inquiries on water conservation and management. These submissions are supported by independent Thinkpieces and are publicly available on the WCWC website.
- 4 The WCWC has produced an Overview, which consolidates the Company's principal contributions during 2025. It highlights consistent themes and key messages intended to inform the national debate on the future of water management, ahead of the forthcoming Water White Paper. The full Overview is archived on the WCWC website under Thinkpieces. This briefing has, for the first time, been drafted with the assistance of AI.

<https://waterconservators.org/wp-content/uploads/filr/4194/JAN-26-OVERVIEW-of-consultations-and-thinkpieces-in-2025.pdf>
- 5 The WCWC's expertise is strongest in water services and regulation. While agriculture is addressed where relevant, the focus remains on water governance, infrastructure, and environmental protection.

Approach and Context

6 Water management is best understood as a complex system of interconnected initiatives rather than a series of isolated decisions. Strategic goals can be undermined by unresolved technical or regulatory details.

7 During 2025, public and political attention returned firmly to water services. Drivers included rising customer bills, climate change, population growth, environmental degradation, and concerns over water company performance and governance.

8 Debate has often been weakened by poor communication and oversimplified statistics. Complex technical issues have been reduced to headline narratives, obscuring underlying causes and trade-offs. This has distorted public understanding and policy development.

9 The WCWC has consistently provided evidence-based responses without seeking to praise or criticise individual organisations. Its aim has been to clarify issues, highlight risks, and suggest practical ways forward.

10 A recurring concern is the absence of an overarching national water strategy. Multiple initiatives continue to emerge in silos, without a unifying framework to align policy, regulation, and investment.

Strategic Messages

Strategy Before Governance

11 Effective water management requires a clear national strategy before structural or governance reform. Unified governance alone cannot substitute for a shared strategic direction.

12 All parties must operate from a common framework that defines objectives, responsibilities, and priorities. Without this, regulation risks becoming inconsistent and ineffective.

Government Responsibilities

13 Government has an active role beyond directing the water sector. Many of the drivers of non-compliance, environmental harm, and system stress lie outside water company control.

14 Delayed action on highway drainage, sustainable drainage systems, product regulation, and emerging pollutants has undermined sector performance and public confidence.

Communication and Public Understanding

15 National communication on water issues remains fragmented. Responsibilities are frequently left to individual water companies, despite issues requiring coordinated national leadership.

16 Examples include water efficiency messaging, waste disposal behaviour, and public understanding of bioresources and pollution sources.

Key Developments in 2025

Tougher Regulation

17 The Water (Special Measures) Act 2025 introduced a significantly more punitive regulatory regime. It strengthened enforcement powers, lowered evidential thresholds, and increased personal accountability.

18 While the WCWC recognises the intent to improve performance, it warned that poorly defined concepts of non-compliance risk legal challenge, misdirected investment, and reputational damage.

The Independent Water Commission

19 The Independent Water Commission reported in June 2025. The WCWC supports its recognition of strategic fragmentation and the need for clearer direction.

Detailed commentary has been reserved pending the Government's White Paper response.

Price Review PR24

20 The completion of PR24 initiated a major investment programme for 2025–2030, accompanied by significant bill increases. Concerns around affordability, debt, and public acceptance intensified during the year.

Growth and New Homes

21 Economic growth and the commitment to deliver 1.5 million new homes have placed additional pressure on water resources, treatment capacity, and drainage systems.

22 Reservoir delivery will take decades, while development impacts are immediate. This mismatch risks undermining both growth ambitions and environmental outcomes.

Climate Impacts

23 A notably dry summer and widespread hosepipe bans reinforced the urgency of resilient water management. Climate variability is now a central operational and planning challenge.

Regulatory and Compliance Issues

Permits and Non-Compliance

24 The concept of permit non-compliance has become central to enforcement, reputation, and investment decisions. However, definitions remain inconsistent and poorly understood outside specialist circles.

25 The WCWC emphasised that non-compliance must account for permit type, monitoring regime, and factors beyond operator control. A failure to do so risks unsafe regulation.

Penalties and Metrics

26 Proposals to tighten penalties focused heavily on storm overflows, yet legislative changes would apply across all permits. This raises concerns for unrelated activities, including bioresources.

27 The WCWC advised against overly complex compliance metrics. It argued that the most meaningful indicator is successful legal enforcement action by regulators.

Monitoring

28 Confusion persists between continuous environmental monitoring and compliance monitoring. Permit limits, sampling methods, and monitoring purposes must remain aligned.

29 The WCWC reaffirmed earlier proposals for strengthened, independently audited operator monitoring, rather than wholesale replacement by third parties.

Storm and Emergency Overflows

30 Storm and emergency overflows remain highly visible political issues. However, their performance is influenced by factors across planning, drainage, consumer behaviour, and climate.

31 Key unresolved issues include:

- Delayed implementation of mandatory sustainable drainage systems
- Automatic rights of sewer connection under existing legislation
- Insufficient national leadership over inappropriate waste disposal
- Limited consideration of emergency and unavoidable events

32 Guidance issued during 2025 addressed some concerns but excluded emergency overflows from scope, despite their inclusion in legislation.

33 The WCWC reiterated that achieving environmental standards requires coordinated government action, not solely infrastructure investment.

Catchments and Planning

34 Catchments and river basins are the natural units of water management. Catchment-based planning must remain central to regulation, development, and environmental delivery.

35 The WCWC welcomed renewed emphasis on catchments in the Water Commission report and the revised Environmental Improvement Plan. However, tensions remain with parallel planning reforms.

36 The introduction of Environmental Delivery Plans risks fragmenting responsibilities unless fully integrated with catchment planning.

37 The WCWC continues to advocate a single, integrated approach to water, land use, and environmental management.

Forever Substances: PFAS and Microplastics

PFAS

38 PFAS pollution presents long-term challenges due to persistence and bioaccumulation. Water pollution is transitory; soil contamination is long-lasting.

39 Water companies are bearing disproportionate criticism for a problem driven largely by historic and ongoing product use. Resolution requires government-led bans, trade regulation, and international coordination.

40 The WCWC called for:

- Faster and broader restrictions on PFAS use
- Integration of PFAS action into a national water strategy
- Improved modelling of long-term environmental impacts

- Clear application of the polluter-pays principle

Microplastics

41 Microplastics pose similar challenges, particularly in sewage and bioresources. Removal from wastewater risks increased accumulation in biosolids applied to land.

42 Voluntary approaches have delivered limited progress. Mandatory product standards, including washing machine filters, require stronger policy leadership.

Bioresources

43 The agricultural use of treated biosolids remains the dominant and historically supported option for bioresources management. It contributes to nutrient recycling, soil health, and climate mitigation.

44 Public confidence has been undermined by poor communication and misinformation, particularly around PFAS and microplastics.

45 The WCWC emphasised that any transition away from land application must be managed carefully. Alternatives such as thermal treatment will take time to deliver and face strong public opposition.

46 A mixed economy approach is required, supported by innovation, clear regulation, and a credible transition plan.

Water Resources, Efficiency, and Homes

Water Resources and Growth

47 Water availability will increasingly shape economic development and settlement patterns. New towns and major industrial projects must align with long-term resource planning.

48 Some thinking on the circular water economy needs repositioning

Water Efficiency

49 The Water Efficiency Roadmap provides a strong foundation, but regulation has evolved in silos. Building Regulations should align with existing Ofwat incentive schemes to avoid duplication.

50 Reducing consumption in existing homes remains under-developed. Repurposing incentives to support retrofitting would deliver significant benefits.

51 The WCWC supported national information campaigns and urged Government to introduce systems to make universal metering more compelling .

New Homes

52 The WCWC proposed differentiated design standards based on flood risk, water stress, and catchment sensitivity. These draw together water efficiency, drainage, and waste management requirements.

Charges and Affordability

53 Charging structures can support consumption reduction but must protect vulnerable customers. The WCWC continues to support trials of alternative tariffs and lessons from the energy sector. But block tariffs can discriminate unfairly.

53 Any reforms must balance environmental objectives with social fairness and public acceptability.

Conclusions

54 The WCWC's contributions during 2025 reinforce several consistent conclusions:

- All organisations, private and public, must behave legally, with integrity, and make evidence-based decisions
- A national water strategy is essential and urgent
- Strategy must precede governance reform
- Water management is a shared societal responsibility
- Catchments must remain the foundation of planning and regulation
- Regulation must be coherent, proportionate, and evidence-based
- Communication and public understanding require sustained national leadership

55 The WCWC looks forward to responding to the Government's Water White Paper and continuing to support informed, practical reform of water management in England.