

## Submission of evidence from the Westminster Sustainable Business Forum: water quality and infrastructure follow-up

This document forms the Westminster Sustainable Business Forum's response to the Environmental Audit Committee's call for evidence on water quality and infrastructure.

The Westminster Sustainable Business Forum (WSBF) is Policy Connect's high-level coalition of UK businesses, Parliamentarians, Civil Servants, academics, and other organisations. It provides a politically neutral environment for knowledge sharing and discussion on sustainability policy, helps to inform the wider sustainability agenda in government, and is a trusted source of independent information and advice for policymakers. The WSBF publishes authoritative research reports; impacts government policy through its in-depth round table policy discussions; and informs the wider sustainability debate by convening stakeholders at larger networking events and seminars.

The WSBF is submitting written evidence to the Committee based on its recent work on water and flood management. We have responded to the questions within the consultation that are most relevant to our work, in particular, our recent reports [Bricks and Water: Building Resilience for England's Homes](#) (2020) and [Bricks and Water: Managing Flood Risk and Accelerating Adaptation in a Climate Emergency](#) (2023). Both these reports had wide support across the planning, water, and insurance industries, and Environmental Audit Committee Chair, Rt Hon Philip Dunne MP, acted as a vice-Chair to the latter.

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### What progress has there been in urban planning and development in relation to water supply and treatment?

**Very little.** As the Committee itself pointed out within its original inquiry on water quality, England's sewerage system is overloaded and unable to cope with the increasing pressure of new development and the impact of heavier rainfall. One of the most effective ways to alleviate pressure on this system is to reduce the amount of water that is discharged into surface water and combined sewers. This can be done using Sustainable Drainage Systems (SuDS), which slow, store, and re-use rainfall close to where it falls.

In England, developers currently have the automatic right to connect surface water arising from new homes to the public sewerage system, irrespective of whether there is capacity for this. Schedule 3 of the Flood and Water Management Act, 2010 (Schedule 3) ends this automatic right to connect and provides a framework for the approval and adoption of SuDS, paving the way for their widespread use. However, as the Committee has highlighted previously, Schedule 3 has not been implemented in England, resulting in the absence of SuDS in many new developments.

Following a recent review, the Government has committed to implementation of Schedule 3, subject to a final consultation on scope, threshold, and process by the Department for Environment, Food and Rural Affairs. This consultation was promised in 2023, however, it is yet to be announced. In its most recent [Bricks and Water](#) inquiry, the Westminster Sustainable Business Forum recommended that this consultation begin as a matter of urgency. Furthermore, Bricks and Water Chair, Baroness McIntosh of Pickering has raised this issue on several occasions in the House of Lords and in subsequent correspondence with the Minister. However, to date, no announcement has been made on either the timing of the consultation or the implementation of the legislation.

Implementing Schedule 3 in England is a long-overdue measure that would not only have a direct, positive impact on water quality but would also have wider benefits associated with the mandatory use of SuDS in new development. These benefits include reduced flood risk, increased biodiversity, improved air quality, carbon reduction, and improved public health. It therefore remains our view that the consultation should be brought forward immediately to allow it to be completed in advance of a General Election.

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CC: Baroness McIntosh of Pickering, Chair, Bricks and Water

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