

Response ID ANON-86KE-FJWW-V

Submitted to Consultation on Reform of the Bathing Water Regulations 2013
Submitted on 2024-11-29 10:47:22

Confidentiality

Would you like your response to be confidential?

No

If you answered yes, which information would you like to keep confidential and why?

Please explain here:

Information about you

Please provide your full name. If you are representing an organisation or group, you will be asked its name later.

Please provide your name here :

[REDACTED]

Please provide your email address

Please provide your email here:

[REDACTED]

In what capacity are you completing this consultation?

As an NGO or other non-profit public interest group

Where are you currently based yourself? If you are representing an organisation or group, you will be asked where it's based later on.

England

Additional information about organisations

What is the name of the organisation or interested group that you are responding on behalf of?

Please provide your organisation name here:

Cam Valley Forum

Where does your business or organisation operate? (Select all that apply)

England

Impact Assessment

Do you consider it likely that any of the proposed reforms will have a negative or positive economic impact on your organisation?

No change

Reform 1 - Remove the automatic de-designation provision from the Regulations.

To what extent do you agree or disagree with the proposed removal of automatic de-designation from the Bathing Water Regulations 2013 for England and Wales?

Strongly agree

Please give reasons for your answer

Please explain here:

Yes definitely remove AUTOMATIC de-designation.

But after 5 years, IF all feasible measures have been taken to improve water quality, and its still not likely to be "sufficient" within a FURTHER 5 years, then review work to date and future options and consider de- designation.

The review should be made public, so recreational users understand the reasons for de designation.

Note that the 5 year AMP cycle for water industry investments makes it unreasonable to be considering de-designation after just 5yrs. 10 would be more reasonable.

Remove the current requirement for de-designated sites to PERMANENTLY display signage saying the water quality is poor. This blights the area, and wont permanently be true.

Reform 2 - Amend the Regulations to include the feasibility of improving a site's water quality to at least 'sufficient' as a criterion for final designation

To what extent do you agree or disagree that water quality, the feasibility to improve water quality to 'sufficient' standard, physical safety and environmental protections be considered before deciding whether to designate a site as a bathing water under the Bathing Water Regulations 2013 for England and Wales?

Strongly disagree

Please give reasons for your answer

Please explain here:

NO

This negates the purpose of BWD as a way to improve water quality in places with lots of recreational use

How could this ever be demonstrated by an applicant? One doesn't know if it's feasible, and at what cost, until the completion of the apportionment study, but without designation and a "poor" rating, there's no apportionment study.

And what costs would be deemed to be acceptable to improve water quality to "sufficient" level?. ...

The de-designation route offers a better way to avoid disproportionate expenditure. After 5 years there will be much better understanding of the local causes of poor water quality, and "quick win" improvements will have been done.

How should the public be notified that a site has been considered as a bathing water but not designated on the grounds that it is not feasible to improve water quality to a 'sufficient' standard?

Notification on the Swimfo website in England or Bathing Waters Explorer Website in Wales.

Please specify other here :

Reform 3 - Remove the fixed dates of the monitored bathing season from Regulations

To what extent do you agree or disagree with the proposed increase in flexibility of Bathing Season dates prescribed in the Bathing Water Regulations 2013 for England and Wales?

Strongly agree

Please give reasons for your answer

Please explain here:

We have many people that kayak and swim here year round, but places vary,

Climate change is increasing the season.

But the minmum should be say 5 months, or say 15 May to 31 Sept

Technical Amendments

Are you content with the 9 proposed technical amendments listed above?

Yes

Wider Reforms and Call for Evidence

To what extent do you agree or disagree that government should pursue wider reform of the Bathing Water Regulations 2013 for England and Wales to include widening the definition of 'bathers'?

Strongly agree

Please indicate a reason for your answer

Please indicate a reason for your answer here:

We strongly agree. At our newly designated site, we have a very active canoe club, whose members frequently immerse themselves.. either to practice techniques or accidentally. We know at times they get sick

We also have lots of paddleboarders, people in inflatables, rowers AND PUNTS.

We recommend that the definition of recreational water user is broadly defined, based on the risk of immersion.

Which water users should be included within the definition of 'bather'?

Kayakers/Canoeists, Paddle Boarders, Paddlers (those in the water but not fully submerged), Rowers, Small boat users, Surfers, Swimmers, Wind Surfers, Other (please specify)

Please specify other here :

Punters (very important in Cambridge!)

To what extent do you agree or disagree that the government should pursue wider reform of the Bathing Water Regulations 2013 for England and Wales to include the use of multiple monitoring points at bathing water sites?

Strongly agree

Please indicate a reason for your answer

Please indicate a reason for your answer here:

Yes, especially where useful for identifying causes of poor water quality. Multiple test sites are particularly useful on rivers

Any other information

Please provide links to any relevant evidence that you have used to inform your views for this consultation. If there's anything else you'd like us to know or consider please add it here.

Please provide anything you want us to consider here:

As a community based organisation in Cambridge we've been working with Anglian Water and the EA, investigating sources of faecal pollution that are contributing to our poor water quality. We received designation for the Cam at Sheeps green in May 2024

You can see a summary of our investigations and conclusions here

<https://camvalleyforum.uk/sewage-sleuthing-the-river-cam/>