



London Waterkeeper Trustees' Annual Report

1st January – 31st December 2022

The Office Club, The Bussey Building, Unit B31	
133 Copeland Road, Peckham	
London	
SE15 3SN	
Charity number	1165862

Names of the charity trustees who manage the charity:

	Trustee name	Office (if any)	Dates acted if not for whole year	Name of person (or body) entitled to appoint trustee (if any)
1	Dee O'Connell	Chair	All year	AGM and Trustees
2	Chris Jones	Secretary	Until 21/6/22 end of term	AGM and Trustees
3	Sarah Saunders		All year	AGM and Trustees
4	Charles Law	Treasurer	All year	AGM and Trustees

Name of chief executive:

Theo Thomas

Structure, governance and management

Type of governing document	Constitution
How the charity is constituted	CIO
Trustee selection methods	As set out in the constitution, trustees shall be elected by members at the AGM. A full term is 5 years. Once a term is complete, the trustee will retire at the AGM and may stand for re-election. Vacancies so arising may be filled by members at an AGM. The members or the trustees may at any time decide to appoint a new trustee in accordance with the constitution.

London Waterkeeper's charitable objects

To promote for the benefit of the public the conservation, protection and improvement of the physical and natural environment, in particular the rivers and other water bodies within the London Watershed.

Aims for the year and activities

Sewer overflows. We were determined to increase our ability to scrutinise Thames Water and the regulators. While there had been more awareness of the frequency of sewer spills there was less understanding of how and where improvements would be made. We believe there is a great risk that the 'solutions' that the authorities will develop could be too costly and rely on overly conventional engineering.

We had identified the Storm Overflow Assessment Framework as a way for the public to insert themselves into the process. The SOAF was developed by the water industry and Environment Agency to address overflows that discharge too frequently.

To this end we met with King's College London's Legal Clinic early in the year. A team of law students worked under the supervision of qualified lawyers to give us an opinion on using the SOAF to register public dissatisfaction with the number of sewer overflows and expose the efforts being made to resolve them (and how appropriate they were). This work was pro bono. This advice gave us an effective way to use the SOAF in our campaign, in conjunction with the Environmental Information Regulations 2004.

This method echoed our 'Rainy Day' campaign that had successfully seen Thames Water agree to put its sewer overflow monitors online, in real-time (this commitment was made in late 2021).

We also planned to look in more detail at the permits for sewer overflows. We had found some that dated back more than fifty years. This indicates that the Environment Agency is failing to regulate Thames Water effectively.

In January 2022, thanks to the generosity of funders, we were very happy to welcome Safiya Egeh as our first River Project Co-ordinator. The first part of the year saw training and site visits as part of the induction process. This role allowed the organisation to carry out more research, update our website, and respond to requests for help.

We planned to apply to Patagonia for grant funding, which we did in May 2022. The application was successful. After securing funding from the Network for Social Change in 2021, we were hopeful of being invited to apply again. Our sponsor informed us in the summer that we were able to submit a grant application (which was successful).

We continued to support the work of people that live close to the Wealdstone Brook in north Brent. The Friends of Woodcock Park are a highly effective grassroots campaign group, and we are able to bolster their efforts and increase their expertise when dealing with Thames Water, the Environment Agency and local councils.

Stormwater pollution. This is also known as road runoff. During dry periods of weather, pollution from vehicles builds up on roads and other paved surfaces. This is from tyres, brake pads, and engines. When it rains it is washed into drains. In two thirds of London they flow to rivers. This pollution source on its own is a reason why rivers fail water quality standards. The problem is unregulated.

The Government has consulted on this pollution source several times, but no action or policy has been developed.

In other countries permits are issued for drains that discharge runoff to waterbodies. While the Environment Agency has the option to do this under the Environmental Permitting Regulations 2016, no permits have been issued. The reason given for this is that it is too complex. We see this is a failure to use the law to protect the environment. We planned to explore the reasons for the lack of action in this area and create ways to challenge them.

Achievements and performance

Sewer Overflows. From sending our 'Rainy Day' requests in 2021 it became apparent that not every sewer overflow was fitted with an Event Duration Monitor. When people sent our 'Rainy Day' emails Thames Water was legally obliged to tell them if a sewer had discharged to a river. Working with a trustee from the Brent River and Canal Society we were able to expose the fact that there were potentially double the number of sewer outfalls along rivers in the Brent catchment. This also meant that they were unconsented. It is illegal for a sewer overflow to operate without a permit. We were able to establish that some of these outfalls along the Brent were in operation. One example is the overflow that discharges into Brent Lodge Park. This means that the public have no idea they are at risk of coming into contact with sewage.

Channel 4's documentary programme Dispatches contacted us and we gave the story to them as an exclusive. This was broadcast in August 2022. In the programme it was revealed that several water companies are operating sewers with no permits. In the wake of the broadcast we suspected that the number of Thames Water sewers that had no permit was much higher than they had admitted. They had told us there were 72. We started a campaign that allowed people to send a legal request for the information. Thames Water then admitted to there being 153. Ultimately the pressure led them to inform the Environment Agency that there were in fact 246 unconsented sewer overflows, or almost 40% of the total.

We further researched our plan to use the Storm Overflow Assessment Framework, to follow on from the unconsented sewer campaign. This saw us establish which were the worst performing sewers in London and that also had the greatest impact on the public realm. For example, the Capital's most frequent spiller discharged into a river flowing through Mayesbrook Park, in Dagenham. We planned to launch the campaign in 2023.

Along with other organisations we were allowed to intervene in the legal action between the Manchester Ship Canal and United Utilities. UU were seeking a ruling that would prevent riparian owners from suing them for sewer overflows. This was pro bono.

Stormwater pollution. This issue saw us carry out large amounts of research and site visits. It became apparent early on that very little had been done to tackle the problem. While there had been academic research to determine the effect of the problem this work hadn't resulted in policy development or enforcement action. In fact, the Defra team responsible for that work had been disbanded some years earlier.

Part of the research required us to gain an in-depth understanding of the surface water drainage networks in London. We focused on a range of locations across the city, and paid Thames Water for Asset Location Searches. These maps show where surface water drains and foul sewers run. In addition, they indicate where the polluted surface water enters rivers. We also researched different technologies that can be used to clean runoff before it reaches a river. The best option is to use natural drainage, or Sustainable Drainage Systems to filter the water of pollution by trapping the sediment. These vegetated areas can break down petrochemical pollutants too. We also looked at the more traditional use of Oil Interceptors. These large chambers are typically installed in car parks or petrol station forecourts to skim off the pollution before it reaches the river. The official guidance states that car parks of more than 50 spaces should have interceptors fitted. However, it was almost impossible to discover if they had been installed, and crucially, if they were maintained (without regular emptying they become a source of pollution).

We wrote legal letters to several suspected polluters to give them the opportunity to demonstrate they were legally compliant. We received a mix of replies from the sector. Some gave an indication that they were preventing pollution from reaching rivers, while others gave inadequate responses. It became clear that the Environment Agency does not check whether these businesses are causing pollution. We continue to develop this work.

Community Action. In the spring there was a serious pollution event in the Wealdstone Brook. Local residents were angered by yet another setback. We were able to support them as they pushed for greater investigations by Thames Water and the Environment Agency. Coincidentally the Friends of Woodcock Park had organised a meeting by the river with Thames Water. London Waterkeeper spoke at the event, strengthening the calls for action. London Waterkeeper connected the Friends with an urban creeks biologist from Seattle, Washington. The hope is that the river will be restored to a more natural state in the park.

After an approach from Havering Friends of the Earth, London Waterkeeper met with them at Harrow Lodge Park. Here the River Ravensbourne has suffered from pollution over several years. We were able to give FoE training on spotting pollution and how to report it to Thames Water and the Environment Agency. We also contacted Thames Water to check if the main sewer was obstructed – there was evidence that it had overflowed onto the grass in the park.

On World Water Day London Waterkeeper spoke at a conference 'Reviving UK Waterways' organised by the Environmental Law Foundation. As part of the EndSewagePollution Coalition, London Waterkeeper attended the Surfers Against Sewage Water Quality day of action in April. London Waterkeeper spoke at two meetings of CIWEM, their urban drainage conference, and to their Northern Ireland association. Talks were also given to the Bertha Foundation, Amersham Women's Institute, Woodcock Park AGM, CPRE London AGM, Pesticide Action Network London. We were active member of the UnChecked coalition which works to protect the regulations underpinning public health and the environment.

We had online meetings to explore the creation of a Waterkeeper organisation in Dublin, Ireland. London Waterkeeper attended the global gathering of Waterkeeper groups in Washington DC. As part of that trip we visited Philadelphia to see the Sustainable Drainage Systems the city is building. This will see natural drainage used to cut the number of sewer overflows.

Public Benefit.

We can confirm our trustees do have regard to the Charity Commission's public benefit guidance when exercising any powers or duties to which the guidance is relevant. They are aware of the guidance and have taken it into account when making decisions to which it is relevant.

Financial review

The charity's policy on reserves:

The trustees consider that three months reserves are appropriate and are working to maintain that level of reserves.

Details of any funds materially in deficit

None

Financial activities for the year ending 31st December 2022:

2022 was our most successful year so far in terms of funding. We secured grants from the Network for Social Change and Patagonia. As this was unrestricted funding it was a significant boost to our core functions.

Funds held as a custodian trustee on behalf of others

No funds were held as a custodian trustee.

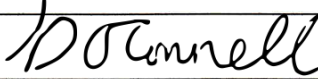

Exemptions from disclosure

None.

Declaration

The trustees declare that they have approved the trustees' report above.

Signed on behalf of the charity's trustees

Signature(s)		
Full name(s)	Dee O'Connell	Charles Law
Position	Chair	Treasurer
Date	29 th October 2023	28 th October 2023



Receipts and payments accounts

CC16a

For the period from	01/01/2022	To	31/12/2022
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Section A Receipts and payments

	Unrestricted funds to the nearest £	Restricted funds to the nearest £	Endowment funds to the nearest £	Total funds to the nearest £	Last year to the nearest £
A1 Receipts					
	-	-	-	-	-
Donations	59,980	-	-	59,980	33,163
Grant	7,559	-	-	7,559	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
Sub total (Gross income for AR)	67,539	-	-	67,539	33,163
A2 Asset and investment sales, (see table).					
	-	-	-	-	-
	-	-	-	-	-
Sub total	-	-	-	-	-
Total receipts	67,539	-	-	67,539	33,163
A3 Payments					
Salary	35,675	-	-	35,675	14,973
NI	6,388	-	-	6,388	1,879
Pension	2,836	-	-	2,836	826
Suppliers	500	-	-	500	-
Accommodation	4,704	-	-	4,704	1,152
Insurance	179	-	-	179	179
General Expenses	2,880	-	-	2,880	272
Mobile Phone	300	-	-	300	300
Travel	1,509	-	-	1,509	217
Membership and fees	86	-	-	86	111
Postage & Stationary	-	-	-	-	-
Technology	2,780	-	-	2,780	1,438
Interest	(23)	-	-	23	-
Charges	93	-	-	93	96
VAT	(1,267)	-	-	1,267	426
Sub total	56,641	-	-	56,641	21,017
A4 Asset and investment purchases, (see table)					
	-	-	-	-	-
	-	-	-	-	-
Sub total	-	-	-	-	-
Total payments	56,641	-	-	56,641	21,017
Net of receipts/(payments)	10,899	-	-	10,899	12,146
A5 Transfers between funds	-	-	-	-	-
A6 Cash funds last year end	33,243	-	-	33,243	21,097
Cash funds this year end	44,142	-	-	44,142	33,243

Section B Statement of assets and liabilities at the end of the period

Categories	Details	Unrestricted funds to nearest £	Restricted funds to nearest £	Endowment funds to nearest £
B1 Cash funds	CAF	44,142	-	-
			-	-
		-	-	-
	Total cash funds	44,142	-	-
(agree balances with receipts and payments account(s))		OK	OK	OK



Categories	Details	Unrestricted funds to nearest £	Restricted funds to nearest £	Endowment funds to nearest £
B2 Other monetary assets		-	-	-
		-	-	-
		-	-	-
		-	-	-
		-	-	-
		-	-	-
		-	-	-

Categories	Details	Fund to which asset belongs	Cost (optional)	Current value (optional)
B3 Investment assets			-	-
			-	-
			-	-
			-	-
			-	-

Categories	Details	Fund to which asset belongs	Cost (optional)	Current value (optional)
B4 Assets retained for the charity's own use			-	-
			-	-
			-	-
			-	-
			-	-
			-	-
			-	-
			-	-
			-	-

Categories	Details	Fund to which liability relates	Amount due (optional)	When due (optional)
B5 Liabilities			-	
			-	
			-	
			-	
			-	

Signed by one or two trustees on behalf of all the trustees

Signature	Print Name	Date of approval
 C Law	C Law	1/3/23
 D O'Connell	D O'Connell	



Section A

Independent Examiner's Report

Report to the trustees

LONDON WATERKEEPER

On accounts for the year ended

31 DECEMBER 2022

**Charity no
(if any)**

1165862

Set out on pages

1 & 2

I report to the trustees on my examination of the accounts of the above charity ("the Trust") for the year ended **31 / 12 / 2022**.

Responsibilities and basis of report

As the charity's trustees, you are responsible for the preparation of the accounts in accordance with the requirements of the Charities Act 2011 ("the Act").

I report in respect of my examination of the Trust's accounts carried out under section 145 of the 2011 Act and in carrying out my examination, I have followed all the applicable Directions given by the Charity Commission under section 145(5)(b) of the Act.

Independent examiner's statement

[The charity's gross income exceeded £250,000 and] I am qualified to undertake the examination by being a qualified member of [insert name of applicable listed body]. ~~Delete [] if not applicable.~~

I have completed my examination. I confirm that no material matters have come to my attention in connection with the examination (other than that disclosed below *) which gives me cause to believe that in, any material respect:

- the accounting records were not kept in accordance with section 130 of the Charities Act; or
- the accounts did not accord with the accounting records; or
- the accounts did not comply with the applicable requirements concerning the form and content of accounts set out in the Charities (Accounts and Reports) Regulations 2008 other than any requirement that the accounts give a 'true and fair' view which is not a matter considered as part of an independent examination.

I have no concerns and have come across no other matters in connection with the examination to which attention should be drawn in this report in order to enable a proper understanding of the accounts to be reached.

* Please delete the words in the brackets if they do not apply.

Signed:

Amrit Moore

Date:

27 10 2023

Name:

AMRIT MOORE

Relevant professional qualification(s) or body

ACA, BFP

(if any):

Address:

Section B

Disclosure

Only complete if the examiner needs to highlight material matters of concern (see CC32, Independent examination of charity accounts: directions and guidance for examiners).

Give here brief details of any items that the examiner wishes to disclose.