



UKDP Private Sewers Transfer Survey Results

Councils in England and Wales December 2010



Survey Foreword

UKDP works on behalf of councils across England and Wales to resolve shared drainage issues, providing a central hub of communications and problem solving in these complex and sensitive cases. During our conversations with the councils we work with, it quickly became apparent that communication with them regarding the transfer of private sewers had been limited, and there seemed to be confusion as to the role councils might have to play post transfer.

It is councils who are often very much at the front end of dealing with private shared sewer defects, and we therefore felt it was crucial to understand how the relevant departments felt about transfer – from how it might affect their teams through to how it might affect local residents. We compiled a survey to gain a better insight into these views and opinions and were delighted that so many councils responded – in total we received 151 responses from 129 councils across England and Wales. Our research has indicated that there are approximately 330 councils with teams currently handling drainage cases, and therefore the results reflect the views of 39% of the chosen sample.

We hope that the survey will help in sharing opinion and viewpoints across the councils who took the time to respond. We also hope that it will help aid decision making across key parties involved in the transfer of private sewers, and encourage clear and consistent communication and working relationships to ensure that the transfer process is as smooth as possible.

Executive Summary

Notes to the Reader

To follow is a summary of the key themes identified in the survey undertaken. As a number of questions also allowed for additional comments by respondents, a sample of comments will be included after each question response in the main body of this report. Due to the volume of additional responses provided, it was not feasible to include every response within this printed report. However, a full and unedited version of the comments made in respect of each question can be viewed and downloaded by visiting our website www.ukdrainageprotocol.com.

General

- The significant majority of council respondents (86.8%) believe that the transfer is a positive move by government, specifically around reducing confusion and potential cost for homeowners. However, the additional comments provided suggested that respondents believe this is very much dependent upon service levels and delivery by the Water and Sewerage Companies (WaSCs).
- In drainage cases when the council respondents had become involved, on average 76.25% of cases resulted in an unblock being required, whereas 23.75% of cases required a permanent repair.
- 65.5% of respondents believe that homeowners will react to the impending transfer by leaving any repairs necessary until 1st October with the expectation that the WaSCs will resolve the issues. In many cases councils believed that homeowners were largely unaware of the transfer, however in others respondents suggested that they are already seeing evidence of a reluctance to resolve repair issues.
- 83.1% of respondents believe that a formal protocol is required post transfer to ensure that all parties involved in resolving drainage cases had an agreed way of working. The key cause for concern for councils was communications between themselves and WaSCs as well as between WaSCs and homeowners.

The role of councils in drainage cases post transfer

- Councils believe that they will still be involved in drainage cases post transfer – only 7.3% believe they will have no involvement moving forwards, which is less than the 8.6% who believe these cases will still take up 25-49% of their time. Additional comments provided to this question indicated that whereas some predicted that the problem would be entirely removed from their team, others believed that they would continue to receive a volume of calls in respect of public health threats caused by defective drains.
- There is a significant amount of confusion over what legal powers councils will retain over WaSCs, if any, post transfer. 53% state that they are not aware of any legal powers they may have over WaSCs, with only 17.9% stating they believe they will be able to use the Environmental Protection Act 1990 (under a statutory notice). This is in contrast to the current environment in which they are able to serve and enforce Section 59 Buildings Act 1984 notices on groups of homeowners to ensure necessary repairs are undertaken.
- Whilst confusion exists over whether councils will have any enforcement powers post transfer, 77.5% of respondents believed they should retain the ability to serve legal notices. This is seen as important in ensuring problems are dealt with swiftly, however there was some concern expressed at how this may be resourced at local authority level given recent budget reductions.

Communications

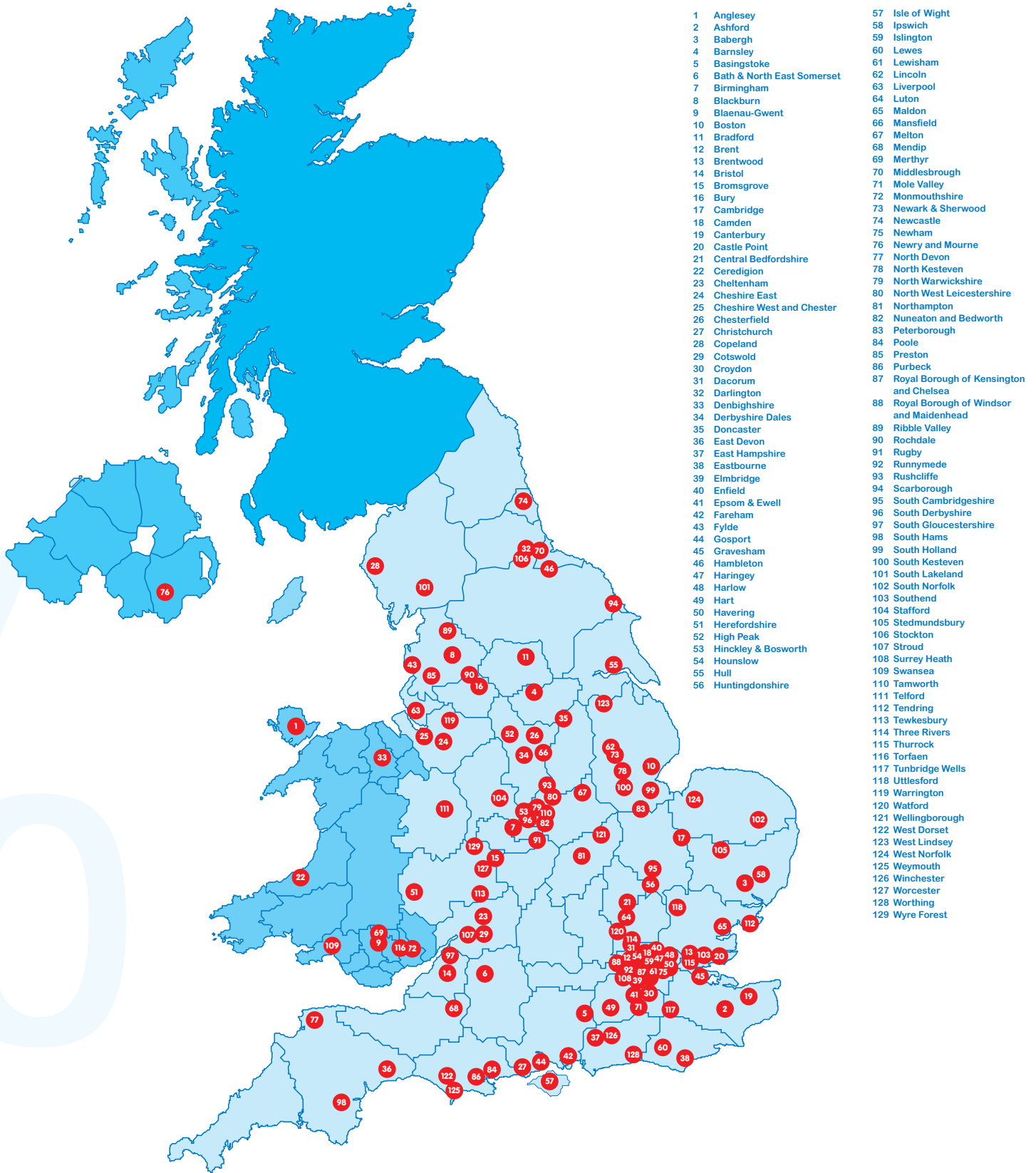
WaSC to Council (and vice versa)

- There is significant variation in the quality of council relationships with their local WaSCs, and the level of communications between these two parties. Whilst most respondents rated their relationship with their local WaSC as good or average, 54.3% stated that they were not being communicated with effectively regarding the transfer, compared to 25.8% who stated that they were. This lack of consistency was highlighted by respondents whose council covered the geographies of two separate WaSCs – in which communication with one WaSC was very good and with the other was poor.
- 77.7% of respondents believe that they possess historic information relating to local drainage cases that would be useful or relevant to the WaSCs, but only 12.4% have been approached to transfer this information. There was concern over the quality of the data and how easy this may be to transfer, however most seemed open to sharing this information if asked to do so.
- Councils believe that improving communications with them should be a key priority for WaSCs and vice versa. 71.3% rated this as a key issue for WaSCs to address, with 64.2% of respondents rating 'Communication with your WaSC' as the biggest issue for councils to address in the run up to transfer.

WaSC to Homeowner

- Respondents rated 'face to face' and written communications as the most effective methods of communicating with homeowners affected by drainage cases post transfer, although some respondents acknowledged that budgets might be restrictive.
- 74% of respondents rated communication with homeowners as a key issue for WaSCs to address, making this the highest rated issue.

Location of councils across England and Wales who responded to the survey



UKDP Private Sewers Transfer Survey Results

1

Approximately what percentage of your/your team's time is taken up handling drainage cases?



ANSWERED QUESTION 151
SKIPPED QUESTION 0

2

In the cases you deal with, approximately what proportion of drainage issues are resolved through an unblock/clearance work (i.e. a soft blockage) versus those where a permanent repair was necessary (i.e. a defect in the pipework)? Please note, this is irrespective of whether the unblock or repair was actually undertaken by the council or privately.



ANSWERED QUESTION 151
SKIPPED QUESTION 0

3

What amount of time would you anticipate you/your team spending on drainage cases after the transfer of private sewers?

	RESPONSE %	RESPONSE COUNT
None	7.3%	11
1% – 24%	83.4%	126
25% – 49%	8.6%	13
50% – 74%	0.7%	1
75% – 99%	0.0%	0
100%	0.0%	0

ANSWERED QUESTION 151
SKIPPED QUESTION 0

4

Do you believe that the transfer of private sewers is a positive move by the government?

	RESPONSE %	RESPONSE COUNT
Yes	86.8%	131
No	4.0%	6
Don't know	9.3%	14

Comments

- Cuts confusion for general public.
- Remove large burden in terms of bureaucracy regarding repair notices.
- However have concerns on how it will apply and the impact it will have on public health if the water companies are not able to meet the demand.
- Not entirely convinced that [the WaSC] will get their act together. Have occasional trouble getting them to deal with s24's as it is.
- It is generally a positive move - it should give householders more certainty rather than the surprise /shock that they experience that they are responsible for private sewers.
- However there are potential negative impacts with the likely potential increase in water and sewerage charges to cover the cost of works.
- Not sure, I think that homeowners are going to suffer and that there will be more confusion (initially) then there is now concerning ownership and responsibility etc.
- I do not agree with the detail. That is I believe individuals should remain responsible for the drains from their property until it joins with the drain from another property.
- It should have been done a long time ago. Enforcement by LAs in default is not an efficient or effective mechanism for dealing with wide spread failing infrastructure. Transfer is highly supported from an LA and private sewer owners point of view.

ANSWERED QUESTION 151
SKIPPED QUESTION 0

5

Currently, councils have the ability to serve and enforce legal notices on homeowners when a defective private sewer poses an environmental health threat. Post-transfer, are you aware of any legal abilities councils will possess over WaSCs to enforce repairs of defective pipework?

	RESPONSE %	RESPONSE COUNT
Yes	17.9%	27
No	53.0%	80
Don't know	29.1%	44

Comments

- No, can't enforce Building Act on Public Sewers and a sewer is not regarded as a 'premises' under the Environmental Protection Act so can't be a stat nuisance.
- Environmental Protection Act 1990 nuisance action for "accumulations that are prejudicial to health or a nuisance". This would be where a pipe has blocked allowing raw sewage to escape and this has been allowed to remain, whether by lack of action in unblocking/repairing or by no/poor clean up operations.
- Possibly serve on owner /occupier who then sites WaSC as responsible person.
- The regulator of WaSCs will need to accept responsibility for ensuring that action is taken and not attempt to pass this off to Local Authorities.
- Statutory nuisance powers available however case law is confusing.
- Historically water authorities have challenged Councils who seek to serve notice on them e.g problems in serving statutory nuisance notices on sewage works for odour complaints. Such cases can be costly for Councils. There needs to be very clear legislation.
- There seems to be very little information available.
- Councils currently have no powers over the WaSCs and I am unaware of any proposal to change this.
- I assume the transferred drainage will have the same statutory immunity that public drainage currently enjoys and any recourse will have to be through OFWAT.

ANSWERED QUESTION 151

SKIPPED QUESTION 0

6

Do you believe that councils should retain the ability to serve legal notice on the WaSCs post-transfer?

	RESPONSE %	RESPONSE COUNT
Yes	77.5%	117
No	16.6%	25
Don't know	6.0%	9

Comments







- In the interest in public health, Councils should have the ability to ensure work is done within 48 hours for transferred sewers as they are more likely to be closer to the properties and therefore prevent use of facilities due to sewage backing up.
- Yes because that might be the only way to motivate the sewage undertaker to do works.
- If the council do not retain this ability, who will?
- As we have a good working relationship with the Company I would not expect to have to serve notices - but we do need to have the power to do so as a last resort. Other LAs may not have the same relationship with their companies and this power would be even more important for them.
- The Government has disproportionately reduced the public health element of Councils' formula grant to account for their reduced responsibility for private drainage. It therefore makes no sense in then imposing on them an extra unfunded responsibility for public sewers. The WaSCs are already regulated and if they fail in their responsibilities then it should be up to Ofwat to undertake enforcement. It may be necessary to change Ofwat's powers over the WaSCs.
- Experience suggests we will have to remind them of their responsibilities as we do now for S24 sewers.
- It would defeat the object of the transfer which aims to streamline the responsibility of private sewer ownership. If private sewer owners were not happy with the response of the WaSC, they would continue to contact EH and our work load would not reduce. There should be an independent body that customers could complain to if they are not happy with the service they receive.

ANSWERED QUESTION 151

SKIPPED QUESTION 0

7

How would you rate your council's relationship with your WaSC?

	RESPONSE %	RESPONSE COUNT
Excellent 	8.6%	13
Good 	42.4%	64
Average 	39.7%	60
Poor 	6.0%	9
Very poor 	0.7%	1
Don't know 	2.6%	4

Comments

- Frequent arguments over ownership of sewers.
- Contact mainly circles round arguments over responsibility (WaSC or householder). Call centre staff seem to be trained to argue that a pipe is not responsibility of WaSC! Also, they have little understanding of PHA1936 s.24. In terms of workers who deal with problems it's very hit and miss and depends on the individual. Most are reasonably helpful.
- We have a good relationship with area based individuals. Relationship on higher management level or region-based is more difficult.
- Call centre a nightmare people on the ground excellent.
- Our Water Authority representatives are always happy to meet and discuss but their promises often don't come to fruition.
- The WaSC for the area that I work in seems to change their mind every week concerning the ownership of section 24's, and which areas have or haven't been adopted by them.
- We pursue on-going cases via Quarterly Liaison Meetings between interested parties.

ANSWERED QUESTION 151

SKIPPED QUESTION 0

8

Is the WaSC in your area communicating effectively with your council regarding the proposed transfer?

	RESPONSE %	RESPONSE COUNT
Yes 	25.8%	39
No 	54.3%	82
Don't know 	19.9%	30

Comments





- We have 2 Water Companies that cover the LA area and have had good communication from one and no communication with the other.
- The larger one is and the smaller one appears not to be moving on it.
- We have to initiate contact the communication is reactive not pro-active on the part of the WaSC.
- Yearly liaison meetings, and a working group set up.
- No communication at all so far.
- They are sending information every now and again.
- We have not received any communication to my knowledge with the WaSC regarding the transfer at this moment in time.
- Although there is a possibility that the WaSC have communicated higher up the management structure and the information is not being filtered down.

ANSWERED QUESTION 151

SKIPPED QUESTION 0

9

How well do you feel the WaSCs are prepared for the transfer?

	RESPONSE %	RESPONSE COUNT
Very well prepared 	2.0%	3
Prepared but with some areas to address 	24.5%	37
Not prepared at all 	14.6%	22
Don't know 	58.9%	89

Comments

- It's very hard to say as little info in this regard has been given.
- The sewerage undertaker in this area is to date unsure of drainage runs and not starting to proactively take the information from Local Authorities i.e. drainage maps and plans to start to build a database of local knowledge.
- It would seem that the WaSC cover too large an area, are understaffed, and non-communicative at the best of times.
- Briefing sessions arranged for the New Year when more information may be made available.
- Have heard informal anecdotal evidence.

ANSWERED QUESTION 151

SKIPPED QUESTION 0

10

What issues do you feel are most important for the WaSCs to address?
Please rate these issues in terms of how important you believe they are.

	High	Medium	Low	Not Important	Response Count
Confirmation of ownership– newly adopted versus private drains	68.0% (102)	27.3% (41)	3.3% (5)	1.3% (2)	150
Definition of curtilage	56.7% (85)	31.3% (47)	10.0% (15)	2.0% (3)	150
Communication with homeowners	74.0% (111)	23.3% (35)	2.0% (3)	0.7% (1)	150
Communication with Council	71.3% (107)	27.3% (41)	0.7% (1)	0.7% (1)	150
Mapping	54.7% (82)	36.0% (54)	8.0% (12)	1.3% (2)	150
			Other (please specify):		15





Comments

- A simple and easily understandable definition of curtilage needs to be agreed. Without this I can foresee EHOs still having discussions with WaSCs about responsibility
- Surveying the assets to allow for future planning. There are a lot of pitch fibre sewers that will be failing over the coming years so some plan of works needs to be implemented.
- All issues are of extreme importance. Clarity is imperative for this to transfer to happen without incident
- Each area came out as a high, maps being updated and the public knowing who to contact & who is responsible at the top of the list.
- I believe that they must have a clear and effective system for prioritising repair of defective assets once transferred and sufficient funds ring fenced to achieve improvements in all regions. We believe that Councils should be able to feed into the prioritisation process.

ANSWERED QUESTION 151

SKIPPED QUESTION 0

How well do you believe your council is prepared for the transfer?

	RESPONSE %	RESPONSE COUNT
Very well prepared 	9.5%	14
Prepared but with some areas to address 	52.7%	78
Not prepared at all 	20.3%	30
Don't know 	17.6%	26

Comments

- It will not impact us at all in terms of preparation. We are likely to investigate initially as normal.
- Don't know what's expected of us, no mechanism established to deal with complaints that will still come our way although we may no longer be responsible, Difficulties in establishing where on the system a blockage/defect may be i.e. in the length still responsible for by homeowner or length now responsibility of WaSC. Dispute resolution process, a process of recovery of expenses incurred unnecessarily.
- Just need to know mechanism for referring cases through to Water Authority.
- Can't wait to lose this area of responsibility.
- We have only just started considering the ramifications.
- Don't know as we are unsure as to what our role will be.
- Awaiting guidance from Government on the implementation of the new legislation, including guidance on the expected role of Las.

ANSWERED QUESTION 148

SKIPPED QUESTION 3

12

What issues do you feel are the most important for your council to address?
Please rate these issues in terms of how important you believe they are.

	High	Medium	Low	Not Important	Response Count
Set up a process to work with your WaSC	60.8% (90)	33.8% (50)	3.4% (5)	2.0% (3)	148
Communication with your WaSC	64.2% (95)	31.8% (47)	2.7% (4)	1.4% (2)	148
Handover of information to the WaSC	37.2% (55)	45.9% (68)	12.8% (19)	4.1% (6)	148
Better understanding of how the transfer will impact you	48.3% (71)	40.8% (60)	8.8% (13)	2.0% (3)	147
				Other (please specify):	12

Comments

- Information the council holds is not necessarily accurate. Experience has shown that what is on the plan for new build is not what is put in place. The plans are indicative, and building control functions on whether the system is effective, not whether it's located exactly where it was intended.
- A process will only work if the communication channels are sufficient. Handover of information is important, but I do not expect that all Local Authorities are in a position to readily offer information as it may not be sufficiently recorded
- Protection of public health as a result of transfer.
- TUPE

ANSWERED QUESTION 148

SKIPPED QUESTION 3

13

Does your Environmental Health or Pollution team possess information regarding historic drainage issues that you believe may be relevant and useful to WaSCs? If you answer “Yes”, please continue with questions 14 and 15. If you answer “No”, you should proceed to question 16.

	RESPONSE %	RESPONSE COUNT
Yes	77.7%	115
No	16.2%	24
Don't know	6.1%	9

Comments

- Although we have endeavoured over the past 12-18 months to rectify and resolve any ongoing issues.
- However a lot of this is officer knowledge.
- We have files on the history of both section 24 and private drains /sewers that officers have worked on going back many years.
- I am not sure that a WaSC would be interested in historical information that is paper based. The cost of trying to scan the information into a usable form would probably make it impracticable.
- We have lists of addresses where we have undertaken work, and served notices.
- Probably, but very piecemeal bits of knowledge in the heads of staff who have dealt with particular cases. Information about specific private sewers dealt with is not recorded in a way that would be easy to interrogate and pass on to others.
- Generally through officer experience and remembering certain 'problem' jobs or areas where drainage system is deemed to be poor.

ANSWERED QUESTION 148

SKIPPED QUESTION 3

14

Has your WaSC approached you to transfer this information to them?

	RESPONSE %	RESPONSE COUNT
Yes	12.4%	17
No	75.2%	103
Don't know	12.4%	17

Comments

- Specific items have been requested, but we hold much more.
- Not that I'm aware of, but they may be communicating with others.
- Not aware of any contact from the WaSC.
- Yes, but they have not amended their maps to show changes.
- It has been discussed at a liaison meeting.

ANSWERED QUESTION 137

SKIPPED QUESTION 14

15

Do you believe that the quality and quantity of information your council holds is such that a financial value could be placed against it if a WaSC wishes to use this data?

	RESPONSE %	RESPONSE COUNT
Yes	23.7%	32
No	38.5%	52
Don't know	37.8%	51

Comments

- Paying for time it takes to collate.
- Any request would need to be accompanied with resource to provide the information under FOI.
- Both organisations should seek to share information collected during inspections which would assist in resolving the drainage issue.
- The cost element relates to extracting the information from a hard copy filing system that covers the whole of the Council area.
- Inasmuch as for a limited number of cases that happen to spring to mind we would be able to tell a WaSC useful info about specific private sewers that would otherwise take them time for them to discover from scratch for themselves.

ANSWERED QUESTION 135

SKIPPED QUESTION 16

16

What impact do you feel the transfer will have on the residents in your area?

	RESPONSE %	RESPONSE COUNT
Positive	83.1%	123
Negative	3.4%	5
None	0.7%	1
Don't know	12.8%	19

Comments

- Positive until they experience problems of getting the water authority to come and clear blockage or carry out repairs.
- Positive that there will be less discussion, but not clear that the sewage undertaker will solve problems quicker and it is not beneficial for the residents that the council will have less legal powers.
- It depends on the definition that the WaSC chooses to adopt regarding shared pipework within the curtilage of a dwelling.
- I hope it will be positive as residents get very angry with Council Officers over drainage issues.
- It will be confused and they will not know who to contact about what until the new processes are bedded in and the information is communicated to them.
- I am sceptical about the whole idea.
- Depends on any increased levels of charge associated with transfer.
- Not sure, due to the fact that the majority of homeowners are ignorant to their responsibilities in relation to drainage issues anyway.
- I have answered "positive" as residents will no longer have to finance drainage work in other people's gardens (which they consider not to be "theirs"). However, in reality there may be some negative feedback if "problem" sewers are not repaired asap.
- Should simplify matters for the public when drainage problems arise.

ANSWERED QUESTION 148

SKIPPED QUESTION 3

17

How do you believe the majority of homeowners with current drainage issues will react to the impending transfer?

	RESPONSE %	RESPONSE COUNT
Leave any repairs until post-transfer with the expectation that the WaSC will resolve them	65.5%	97
Proactively resolve the issues whilst covered under insurance	10.1%	15
Don't know	24.3%	36

Comments

- Generally, I don't feel the public are aware of any impending transfer.
- I really believe people will wait until post-transfer. We've already received the first signals indicating this.
- Suspect most don't know of the impending changes.
- It depends on the situation. If the problem is fairly minor then it is of little value resolving the matter prior to the transfer. However, if the issue is major then the repairs must be undertaken prior to the transfer.
- If they can be left they will leave them, if not they may challenge being reimbursed?
- No reaction - they will continue to contact the authority.
- Tend to think unless there is an emergency homeowners won't do anything.
- As the majority of homeowners are currently unaware of their responsibilities it will probably have little reaction.

ANSWERED QUESTION 148

SKIPPED QUESTION 3

18

What do you feel would be the most effective ways for WaSCs to communicate with residents during an investigation and repair project?
Please select as many as you like.

	RESPONSE %	RESPONSE COUNT
Face-to-face	74.3%	110
Telephone	43.2%	64
E-mail	41.2%	61
Written	72.3%	107
Online tracker	24.3%	36

Comments

- Face to face is probably the most effective, but unlikely due to restricted resources
- Some people do not like cold calls by face or phone but a letter would be more acceptable or an email if customer uses a computer.
- Any communication so long as it is consistent is a means to advise those receiving the service. LA's use all bar online tracking as a matter of routine.
- Leaflet drop through doors
- If there is a problem involving many properties a public meeting is useful as it allows people to air their views and ask questions without having to go through a call centre. Having to battle through a call centre to get questions answered is likely to infuriate people who may already be stressed over a drain problem.
- Written communication is the most effective way to ensure that everyone receives the correct information - not everyone is on email or in the house during the day
- Customer should be given preference
- Keeping residents informed at all stages is paramount - no excuses for no updates

ANSWERED QUESTION 148

SKIPPED QUESTION 3

19

Do you think that a formal protocol is required so that all parties involved in drainage issues (WaSCs, councils, insurers, contractors) have an agreed way of working?

	RESPONSE %	RESPONSE COUNT
Yes	83.1%	123
No	6.8%	10
Don't know	10.1%	15

Comments

- Some form of protocol but not necessarily a formal document.
- Very important that when dealing with Drainage Law that all parties are up to date with action that can be taken especially when there is a Public health issue that needs to be dealt with quickly.
- Certainly WASC and councils need something formal, the rest is simply contracted and should not complicate the protocol with additional parties.
- We need to know and to be able to communicate to our residents, when they have a problem, what they can expect in terms of timescales etc. We also need to know that the Company will respond to urgent cases within an acceptable timeframe.
- Private drainage only represent about 3% of my drainage crews time and less than 1% of my office staffs' time. Thus I do not envisage that there should be a significant commitment of resources to deal with the transfer.
- I thought the WaSC dealt with every problem?
- It would be useful for all parties to be clear about what they are responsible for and to whom to direct queries about matters outside their remit, but I'm not sure if this needs a "formal protocol". I'm perhaps naive but would expect that most of it will work out case by case as we go along.

ANSWERED QUESTION 148

SKIPPED QUESTION 3

Please provide any additional opinions on the transfer that may not have been included in the questions above, and outline any further issues that you believe need to be addressed. Please also detail any key challenges that you or your department may face in handling drainage issues post-transfer.

RESPONSE
COUNT

35

Comments

- Who will be responsible for sewers on council estates where there is mixed private and Council ownership?
- Council may be able to offer water undertakers a local cost effective service to carry out initial investigations/unblocking etc.
- I think residents who have a pre-existing drainage problem should sort that out before being taken over by the water company, due to costs involved. I also suspect the water companies do not realise how much work they will take on and this could leave Councils to deal with sewage spillages under Public Health Legislation. The public in general feel that it is not their responsibility to sort out their drains and some do not like claiming on their insurance as they lose their no claims bonus. I also think insurance companies need to be more involved with the process and it would be interesting to know what involvement they will have.
- In the current economic climate I do not believe WaSCs will do anything other than the 'do minimum' approach.
- Generally we welcome this move. As a small rural authority we do not have the facilities or resources to fully investigate issues ourselves, relying on residents carrying out drainage surveys and us acting on results. Some clarification about the handover will be required. We envisage our involvement in drainage work will reduce however there will still be issues with private drains that will need to be addressed. It is a shame that pumping stations and private STW are not covered in this transfer. This is also a significant area of work for us.
- Councillors getting involved and expecting us to do something to help their residents. People expecting us to get involved on the grounds of health and this clashing with the motivational reality of private enterprise; namely money. I think the water companies will do the minimum required to get by e.g. effect a patch repair where possible whereas we tend to make sure drainage notices are up to full specification. I may be wrong but it is my concern.
- I do not see any challenges - all problems will be passed on the Water Company as they arise. If not resolved by them, notices can be served by this authority to ensure that the work is done.
- We feel that there may actually be an increase in workload rather than a decrease if disputes still remain over responsibility and undertakers are able to leave repair work using a similar rationale that they currently use i.e. AMP periods.
- The WaSCs need to communicate with their customer and probably the insurance companies to make them aware of the changes. They need to ensure that the contractors they employ to undertake this work on the transferred sewers are properly trained. They and Trading Standards need to ensure that rogue contractors are not conning customers into paying for drain clearances that should be undertaken by the WaSC for free.
- Residents contact the Council even if the issue is with a Thames Water drain as we are easily contactable. More needs to be done on easily contacting the right person to get the job done.
- It won't always be possible to identify if blockages are in a private drain or shared sewer so who organises the tests / camera survey – WASC or Council or Private owners?
- I also foresee continuing problems with WaSC's evading responsibility by holding different interpretations of what is a curtilage. In particular I can see them still refusing to deal with any sewer on an ex-council estate, arguing that the estate was originally built within one curtilage so in their view no pipe within it is a sewer. There have also been disagreements in the past about pipes receiving the discharge of a single downpipe which itself receives from other properties, such as a rainwater pipe or hopperhead serving adjacent eaves or bathrooms. Ideally the transfer legislation will address all currently disputed examples but I fear it will not.
- Will WaSCs have powers of entry to private property to investigate (a) cases they already know are their responsibility and (b) cases where investigation is needed just to establish who has responsibility.
- We believe that local authorities and WaSCs must communicate with one another before the transfer takes place, and set up lines of communication for when issues arise.

ANSWERED QUESTION 35

SKIPPED QUESTION 116

