

# London Waterkeeper Trustees' Annual Report

## 1<sup>st</sup> January – 31<sup>st</sup> December 2024

Market Workspace,	
133a Rye Lane, Peckham	
London	
SE15 4BQ	
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	Charles Law	Treasurer	All year	AGM and Trustees
3	Sarah Saunders	Acting Secretary	To 3/9/24, then Trustee	AGM and Trustees
4	Alex Worth	Secretary	From 3/9/24	AGM and Trustees
5	Kevin Koon	Trustee	From 3/9/24	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.**

The deteriorating state of Thames Water increasingly dominated the context of our work. This is within the weak regulatory framework which has exacerbated the problems in the water sector.

We were determined to continue to push at the lack of accountability and transparency around sewer overflows to rivers. This ranges from permits to investment in infrastructure.

We continued to focus on the solutions needed to reduce pollution to London's rivers. This is the key part of the debate, not just raising awareness. The reason why sewers in London spill to rivers is because too much of the Capital is paved. With so many impermeable surfaces rain quickly flows down drains and into sewers, overwhelming them. Rather than conventional grey engineering investment (concrete), we need to slow rain down across large areas of the city. This is called green infrastructure. Non-porous surfaces are removed or 'depaved' and replaced with vegetated areas. This is accepted as the best option by Government and water companies.

In March 2024 Thames Water's Storm Overflows Action Plan was published. In common with our approach to other announcements we investigate and challenge them to determine how effective they will be.

### **Stormwater pollution.**

This continues to be an unquantified and unregulated source of pollution. On its own it would see all of London's river fail water quality standards. In dry weather contaminants build up on roads and paved surfaces. When it rains these are washed into rivers, via surface water pipes. There has been some progress on runoff from roads – the most damaging have been identified. However, rectifying this will be a lengthy process as it is expensive and disruptive. Fundamentally we want to see the Environment Agency using permits to regulate discharges from paved surfaces. Unfortunately, it refuses to do so. We planned to investigate the issue further and start to put into place the evidence needed to initiate legal action.

## Achievements and performance

### **Sewer Overflows.**

We highlighted the fact that more than half of the worst sewer overflows have permits that were more than 13 years old. The Government announced that it wanted tougher permits issued to water companies. We asked members of the public to send our request for the Government to strengthen the new permits.

We demonstrated that the overflows that had been hidden from the public are not new infrastructure, or rarely used, but significant assets that were "off the books". This is further evidence that there is still much information to be uncovered.

Thames Water placed its unmonitored, unpermitted sewer overflows on its sewer map in December 2023. While the monitors were not switched on the greyed-out icons showed their exact location. In March 2024 the grey icons on the Event Duration Map were activated. Another level of accountability was achieved.

We highlighted Thames Water's asset health deficit. The lack of investment is estimated by the company as amounting £19bn to rectify. This is in addition to its financial debts of £18bn. In its Business Plan for 2025-30 Thames Water says "We want to break the cycle of sweating assets...the implications of not increasing capital maintenance spend to manage asset health concerns are severe. They include public safety, water quality and compliance with environmental permits". This aspect of Thames Water's malaise is under-reported and under-recognised. But it may well see pollution problems worsen over the next 5-10 years, as creaking infrastructure fails faster than it can be replaced. The resulting pollution would be in addition to sewer overflows.

Thames Water published its Storm Overflow Action Plan in March 2024. Unfortunately, just 6% of the solutions will use green infrastructure. None of the most frequent spillers to rivers have green infrastructure proposed as an option.

In the wake of the publication of the Action Plan we established that much of the work that Thames Water needs to undertake to deliver a cost-effective plan was incomplete or contradictory. Our investigations revealed that in most cases Thames Water has not modelled using green infrastructure to reduce sewer overflows and this won't be completed until 2027.

There is a divergence between public declarations and reality. The great risk is that the company green-lights investment with poor data, resulting in projects that are costly and inadequate.

### Manchester Ship Canal vs United Utilities

London Waterkeeper was an intervener in a court case led by the Environmental Law Foundation, backed by Good Law Project and represented by Hausfeld. At a hearing it was demonstrated that sewage pollution was a significant problem for river and marine communities across the country and not just the Manchester Ship canal. The judgment sets a significant precedent that has implications far beyond the Manchester Ship Canal. Polluting water companies could now be open to private legal action, as well as tougher action and fines from regulators.

Via our lawyers, Leigh Day, we wrote to the Secretary of State for the Environment asking when the Government would activate section 83 of the Environment Act 2021, which would: "(i) place a duty on sewerage undertakers to secure a progressive reduction in the adverse impacts of discharges from storm overflows (the "Duty"); and (ii) give the Secretary of State the power to enforce compliance with the Duty." That provision was not in force. That is despite section 81 of the EA 2021, which inserted section 141DA into the WDA 1991 and placed a duty on sewerage undertakers to publish certain information concerning discharges from storm overflows, coming into force on 17 May 2024. The Government replied "The Secretary of State is continuing to consider an appropriate date on which to commence this provision. As such, the Secretary of State is complying with Parliament's instructions as set out in s.147(3)(n) of the EA 2021, which allows him to appoint the date on which the provision should come into force by way of regulations." We will continue to monitor when/if the section is activated.

### Stormwater pollution.

While reducing runoff from roads is a long-term challenge, we believe targeting the pollution from industrial estates is a more promising option.

We carried out extensive research into the ownership and operation of industrial estates in London. We held a training event with the Legal Clinic at King's College London. This was the start of a process to find out how aware the operators of these sites are of the problem.

We established that the Environment Agency's position is contradictory and undermines their own guidance. This will be at the core of our complaint to the Office of Environmental Protection that the EA is failing in its statutory duty.

### Rights of Nature Toolkit

In January 2024, with the Legal Clinic of King's College London we launched the 'Rights of Nature Toolkit: How to protect Rivers in England and Wales.' This powerful document brings together all the relevant laws that grassroots groups could use to protect rivers. It also suggests ways they can be more effective campaigners.

The Law Works charity made the student team that worked on it joint award winners, "*It's no exaggeration to say the toolkit has taken the environmental law community by storm, with leading*

*environmental lawyers and NGOs commenting on its usefulness.”*  
We carried out two training events using this resource.

#### **Other work.**

We welcomed two new Trustees to the Board; Alex Worth who became our Secretary, and Kevin Koon.

In May 2024 the Mayor of London committed to making London's waterways swimmable by 2034. The London Assembly's Environment Committee scrutinises the Mayor's plans. It held a series of panels. London Waterkeeper's CEO gave evidence at the first one, alongside the Environment Agency's London Area Director.

London Waterkeeper was chosen by Waterscan to be their Charity of the Year for 2025.

In September our CEO attended the global gathering of Waterkeeper groups in Milwaukee, Wisconsin.

#### **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. In terms of our work, there is a direct public benefit. For example, we are now focusing on making Thames Water's investment plans value for money and effective in reducing pollution to London's rivers.

## **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 31<sup>st</sup> December 2024:**

We were awarded grants from Patagonia, Anne Robbins, Garfield Weston and All Aboard Shops.  
Individual donations held steady for the year.

## **Funds held as a custodian trustee on behalf of others**

No funds were held as a custodian trustee.

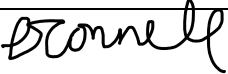

## **Exemptions from disclosure**

None.

## Declaration

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

Signed on behalf of the charity's trustees

<b>Signature(s)</b>		
<b>Full name(s)</b>	Dee O'Connell	Kevin Koon
<b>Position</b>	Chair	Treasurer
<b>Date</b>	30.. October 2025	30.. October 2025



## Receipts and payments accounts

CC16a

For the period  
from

Period start date  
01/01/2024

To

Period end date  
31/12/2024

### 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 £
<b>A1 Receipts</b>					
	-	-	-	-	-
Donations	50,255	-	-	50,255	27,792
Grant	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
<b>Sub total (Gross income for AR)</b>	<b>50,255</b>	<b>-</b>	<b>-</b>	<b>50,255</b>	<b>27,792</b>
<b>A2 Asset and investment sales, (see table).</b>					
	-	-	-	-	-
	-	-	-	-	-
<b>Sub total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total receipts</b>	<b>50,255</b>	<b>-</b>	<b>-</b>	<b>50,255</b>	<b>27,792</b>
<b>A3 Payments</b>					
Salary	37,399	-	-	37,399	36,788
NI	5,945	-	-	5,945	6,519
Pension	3,158	-	-	3,158	3,158
Suppliers	432	-	-	432	972
Accommodation	3,600	-	-	3,600	4,800
Insurance	157	-	-	157	155
General Expenses	1,117	-	-	1,117	1,300
Mobile Phone	300	-	-	300	279
Travel	395	-	-	395	1,183
Membership and fees	188	-	-	188	80
Postage & Stationary	-	-	-	-	-
Technology	2,881	-	-	2,881	2,718
Interest	(19)	-	-	(19)	(49)
Charges	60	-	-	60	60
VAT	(950)	-	-	(950)	(1,350)
<b>Sub total</b>	<b>54,662</b>	<b>-</b>	<b>-</b>	<b>54,662</b>	<b>56,613</b>
<b>A4 Asset and investment purchases, (see table)</b>					
	-	-	-	-	-
	-	-	-	-	-
<b>Sub total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Total payments</b>	<b>54,662</b>	<b>-</b>	<b>-</b>	<b>54,662</b>	<b>56,613</b>
<b>Net of receipts/(payments)</b>	<b>(4,407)</b>	<b>-</b>	<b>-</b>	<b>(4,407)</b>	<b>(28,821)</b>
<b>A5 Transfers between funds</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>A6 Cash funds last year end</b>	<b>15,321</b>	<b>-</b>	<b>-</b>	<b>15,321</b>	<b>44,142</b>
<b>Cash funds this year end</b>	<b>10,914</b>	<b>-</b>	<b>-</b>	<b>10,914</b>	<b>15,321</b>



## 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 £
<b>B1 Cash funds</b>	CAF	10,914	-	-
			-	-
		-	-	-
	<b>Total cash funds</b>	<b>10,914</b>	<b>-</b>	<b>-</b>
	(agree balances with receipts and payments account(s))	OK	OK	OK

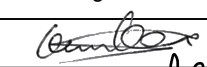
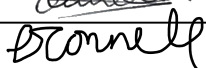
	Details	Unrestricted funds to nearest £	Restricted funds to nearest £	Endowment funds to nearest £
<b>B2 Other monetary assets</b>		-	-	-
		-	-	-
		-	-	-
		-	-	-
		-	-	-
		-	-	-

	Details	Fund to which asset belongs	Cost (optional)	Current value (optional)
<b>B3 Investment assets</b>			-	-
			-	-
			-	-
			-	-
			-	-

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

	Details	Fund to which liability relates	Amount due (optional)	When due (optional)
<b>B5 Liabilities</b>				
			-	
			-	
			-	
			-	

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

Signature	Print Name	Date of approval
	K Koon	30/10/25
	D O'Connell	30/10/25





Section A

Independent Examiner's Report

Report to the trustees

LONDON WATERKEEPER

On accounts for the year  
ended

31 DECEMBER 2024

Charity no  
(if any)

1165862

Set out on pages

1 & 2

Responsibilities and  
basis of report

I report to the trustees on my examination of the accounts of the above charity ("the Trust") for the year ended **31 / 12 / 2024**.

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:

Date:

29/08/2025

Name:

AMRIT MOORE

Relevant professional  
qualification(s) or body

ACA, BFP

(if any):

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Address:

24 ROYLE CLOSE
CHALFONT ST PETERS
SL9 6BB

## 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.

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