

Ofwat H2Open Data Review Blueprint for Water Response – January 2023

Wildlife and Countryside Link is a coalition of 68 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

Blueprint for Water, part of Wildlife and Countryside Link, is a unique coalition of environmental, water efficiency, fisheries and recreational organisations that come together to form a powerful joint voice across a range of water-based issues.

This response is supported by the following Link members:

- Angling Trust
- British Canoeing
- Friends of the Earth England
- Institute of Fisheries Management
- Marine Conservation Society
- The Rivers Trust
- The Wildlife Trusts
- WWT

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Blueprint for Water welcomes this opportunity to share thoughts on open data in the water industry.

As set out in our vision report, '[Actions to Recover England's Waters and Wildlife](#)', strong ambition to improve the state of our water environment must be underpinned by reliable, consistent long-term monitoring and openly available data.

We rely on robust data on the state of the water environment in order to guide actions to protect and enhance freshwater systems, targeting improvements where they will have the greatest benefits and ensuring that resources are used with the greatest efficacy. Data is also essential to ensure that the water industry is held accountable for delivering both environmental and societal obligations. To achieve this, data must be accessible, accurate, and comprehensive.

The importance of data is reflected in our [Environmental Manifesto for PR24](#). This sets out our ambition for PR24, and the action required from Government, regulators, and water companies, to

ensure the Price Review meaningfully delivers for people and for nature. Our manifesto includes several recommendations for data in the water industry, including:

- The water industry should publish real-time data to inform stakeholders and underpin investment decisions, for example on the condition and activity of storm overflows.
- UKWIR should make data from the Chemical Investigation Programme publicly available.
- The top 200,000 businesses that use over 80% of water supplied to businesses should have smart meters by the end of AMP8, and the data should be available to businesses, the retailer and wholesaler.
- Government should endorse the Catchment Systems Thinking Cooperative project (CastCo), which proposes to create a catchment monitoring cooperative, to be the first national-scale framework for standardised citizen science approaches, integrating local monitoring with other low-cost, high-density data into national decision support tools. This should be embedded within both PR24 and WINEP recommendations, and the data available to all practitioners.

Full details can be found in our PR24 [Environmental Manifesto](#). We also provide some further thoughts and recommendations in answer to the questions below.

1. What you expect from a secure, trusted, and useful open data ecosystem;

Data in the open data ecosystem should be robust, accessible and accurate. This should provide an accurate picture of the state of the water environment, such that resources can be effectively used and prioritised, improvements can be targeted to deliver the greatest benefit, and so that all stakeholders can have a good understanding of whether the water environment is improving, and how interventions may – or may not – be working. This is particularly significant given the challenge of historic underinvestment within the water industry, the current cost-of-living crisis, and the critical state of the water environment.

A secure, trusted and useful open data ecosystem should facilitate successful, collaborative partnership working between stakeholders. This should also allow the water industry to be held to account by all stakeholders, for the delivery of both societal and environmental obligations. Water company performance should be easy for customers to find and to understand.

2. What datasets you most want to see opened and what the benefits/ use cases would be;

Blueprint for Water have previously asked that Ofwat increase visibility and transparency of in-AMP industry progress against their expectations. Significant customer engagement and public discussion of water company plans and progress is often limited to the Price Review period, meaning stakeholder engagement and process transparency is not consistent. In-amp progress could be shared through evolving the Discover Water website, or through the production of a new performance dashboard. As above, this would help improve stakeholder knowledge and engagement, and allow the industry to be held to account.

This month, Thames Water have launched a new interactive, real-time map providing sewage discharge alerts from across its network.¹ Though Southern Water has a similar mapping tool for real-time sewage discharges in coastal waters, Thames Water's map is the first to provide such

¹ Thames Water. (2023). <https://www.thameswater.co.uk/edm-map>

information for inland waters. This real-time, transparent reporting should be delivered by all water companies for all storm overflows as soon as possible. This will not only help to capture the extent of sewage pollution and the condition of company assets, but will ensure that water users are fully informed about the state of inland and coastal waters, and can hold water companies to account.

Ofwat should review the data layers made available through the CaBA partnerships, as well as rolling out best practice on DWMP and other statutory planning documents. It is important that water companies demonstrate that they are making use of external data sources to inform their plans; this will build trust and demonstrate prudent use of funds. Water industry data layers should also enable synergies and opportunities for co-delivery to be identified, through Catchment Plans and Local Nature Recovery Strategies. Ofwat should commission work to understand the natural capital opportunities in each catchment to empower local communities to engage with water company business plans, nutrient reduction measures etc. Headlines from 25-year delivery strategies and other longer term planning documents should be made available so local communities can better understand the changes expected in their local areas and better engage with plans to address them.

The WINEP should be made more accessible. CaBA already has a data layer for this, but it is based on the somewhat clunky WINEP spreadsheet. An interactive map showing where schemes are being delivered, the benefits that will accrue etc. will help customers better understand where their money is being spent.

The process for developing the WINEP itself needs to be more transparent. Ideally, stakeholders should be able to work from drafts to final versions of the planning documents, then understand which schemes are being taken forward in the WINEP and ultimately the delivery strategies and business plans themselves. In practice, these are all developed to arbitrary deadlines so any benefits from sequencing and refining options are lost. Water companies should try and coordinate their consultation deadlines and accessibility of data to enable stakeholders to engage.

3. Whether companies should be doing anything differently around the issue of data, and if any of them are doing it well; and

Issues around data cannot be separated from issues around monitoring. A lack of robust monitoring generates inaccessible, inaccurate and incomplete data, leading to poor management decisions and substantial misdirection of resources.

There has been significant public and political concern about the reliance placed on water companies to self-monitor performance in key areas relating to water quality, such as discharges from wastewater treatment works. Indeed, in 2022 it was reported that self-monitoring by water companies was a hundred times less likely to detect breaches than testing by the Environment Agency.² That Environment Agency capacity for robust monitoring has also been constrained by cuts to funds and resources further exacerbates this. The Environment Agency's annual budget has decreased by 52% since 2010 (from £120m to £52m).³ From 2013-2019, the number of water quality

² Engineering and Technology. (2022). 'MPs demand action as data calls into question water company self-monitoring'. <https://eandt.theiet.org/content/articles/2022/09/mps-demand-action-as-data-calls-into-question-water-company-self-monitoring/>

³ Unchecked. (2020). 'The UK's enforcement gap 2020'. <https://www.unchecked.uk/wp-content/uploads/2020/11/The-UKs-Enforcement-Gap-2020.pdf>

samples taken by the Agency fell 45%, and the number of sampling points by nearly 40%.⁴ In 2022, it was reported that Environment Agency staff were being instructed to ignore ‘low-impact’ pollution incidents due to capacity issues.⁵

A more robust monitoring regime is required for the water industry. Ofwat should allow water companies to ring-fence funding for monitoring, and should be working more collaboratively with the Environment Agency to effectively regulate the industry and ensure environmental obligations are being delivered.

4. The challenges and opportunities you see with open data.

Public and customer interest in the water environment has increased in recent years. For example, the 2021 ‘Troubled Waters’ report led by the RSPB in 2021 showed that 88% of people agree that rivers, lakes and streams are a national treasure, 87% believe more should be done to help freshwater ecosystems, and that 83% are concerned about the impact of sewage pollution.⁶ Yet understanding of and engagement from the public in processes such as industry consultations does not always reflect this – for example, a lack of engagement from the public with industry water resources planning. Public trust in the water industry is also low, with the Consumer Council for Water reporting that in 2021 customer trust in water companies fell to its lowest point in 11 years.⁷

There is perhaps an opportunity for open data to make these processes more accessible and engaging, which could in turn help to boost stakeholder engagement and trust.

⁴ Unchecked. (2020). ‘The UK’s enforcement gap 2020’. <https://www.unchecked.uk/wp-content/uploads/2020/11/The-UKs-Enforcement-Gap-2020.pdf>

⁵ The Guardian. (2022). ‘Environment Agency tells staff to ignore pollution complaints, says ex-employee’. <https://www.theguardian.com/environment/2022/aug/29/environment-agency-tells-staff-to-ignore-river-pollution-complaints-age-of-extinction>

⁶ RSPB et al. (2021). ‘Troubled Waters’. <https://www.rspb.org.uk/globalassets/downloads/our-work/troubledwaters-report>

⁷ Utility Week. (2022). ‘Public trust in water companies hits 11-year low’. <https://utilityweek.co.uk/public-trust-in-water-companies-hits-11-year-low/>