

Blueprint for Water: submission to the Independent Water Commission

23rd April 2025

This response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)). The response is supported by Angling Trust, Freshwater Habitats Trust, Friends of the Earth, Froglife, Institute of Fisheries Management, Marine Conservation Society, National Trust, Paddle UK, River Action, River Restoration Centre, RSPB, Soil Association, Surfers Against Sewage, Sustainability First, The Rivers Trust, The Wildlife Trusts, Waterwise, WWF-UK.

Blueprint for Water welcomes the opportunity to submit evidence to the Independent Water Commission.

We have provided evidence in response to the call for evidence questions. We have also submitted a series of papers, providing further evidence and detail. We would be pleased to answer any questions, or to discuss any of this material further.

This document serves as an introduction to and summary of this content, and therefore should be read alongside it.

A vision for the future water system

A healthy, thriving water environment is essential for both people and nature. Without this, Government will not be able to deliver sustainable growth, nor the legally-binding targets under the Environment Act to avoid species extinctions and restore species abundance. Yet it is abundantly clear that current approaches to water management are not achieving this.

We need a water system that delivers an improved water environment, not only through protecting but restoring and enhancing nature. To do so, it must be truly holistic in approach and outcomes-focused, enabling and prioritising action that will deliver the greatest environmental benefit.

Securing a healthy water environment will be necessary to secure further positive outcomes, and indeed will itself contribute to their delivery. For example, a healthy water environment will also bring recreational and public health benefits due to improved water quality, and

increased resilience to climate change and flooding due to the protections afforded by restored ecosystem function. A healthy water environment is also a prerequisite for industry resilience, and therefore the provision of affordable and reliable services for customers.

Government must set the strategic direction

The strategic direction for the water system must be set by the Government via targets with clear, measurable delivery pathways. This should include an overall or 'apex' target for water health, and outcome-focused targets within the Environment Act and the EIP. Pathways must include clear, time-bound measures and actions, and must demonstrate how sufficient funding and resourcing will be provided, thereby better clarifying Government's expectations of the water industry and, importantly, how this will work alongside other sectors such as agriculture and planning.

To help deliver this, Government should introduce a strong nature and climate duty for all regulators whose regulated sectors impact the water environment, and ensure that adequate funding and resourcing is in place to deliver against the pathways.

Delivery via Integrated Water Management, with a focus on outcomes

The strategic direction and oversight provided by Government must be implemented through an Integrated Water Management approach. This will ensure that decision-making is aligned throughout the system, and that national targets can be translated into local and catchment-level objectives. For example, this could be achieved through extending the role and reach of catchment partnerships, and ensuring that the Catchment Based Approach is properly funded. Stronger regional governance will allow sources of funding to be allocated such that implementation can be more efficient, and will help to better identify potential synergies and trade-offs between goals.

This Integrated Water Management approach must shift away from a siloed focus on processes, instead focusing on delivering outcomes. This will allow the most efficient and cost-effective solutions to be used to deliver the greatest environmental benefits. An outcomes-focus will also help address contradictions within regulations, and give greater flexibility to unlock catchment working and greater use of multi-benefit nature-based solutions.

Build on what works, and guard against watering down ambition

Whilst reform is needed, there are good components of the water system that are currently being undermined by poor implementation and governance. One such example is the Water

Framework Directive (WFD) Regulations. There is great potential to enhance WFD so that it can deliver more for nature and for society, but this must take care not to move the goalposts or cut crucial elements such as ‘one out, all out’ and the no deterioration principle under the guise of ‘streamlining’.

For example, WFD can be significantly improved through the inclusion of more of the water environment – particularly smaller waterbodies – and through greater nuance in reporting of progress against different elements. Greater incorporation of natural capital into cost-benefit assessments will help articulate and account for the benefits of these improvements to both nature and society.

Implementation is key

The current water system is complex, and in some places contradictory; better coordination and integration of plans and processes will help to address this. However, unless barriers to good implementation are also addressed, the potential benefit of these reforms will be limited.

Significant change in the water industry will not be possible unless regulators such as the Environment Agency and Ofwat have the resources, capacity and backing from Government to comprehensively monitor, advise and enforce regulations.

Action is needed across all sectors – not just the water industry

The Independent Water Commission is clear in its Terms of Reference that its focus is on the water industry. However, the water industry is not alone responsible for the poor state of the water environment. Nor will its reform alone be sufficient to fix the problem.

The drivers and pressures acting upon the water environment are multiple and complex, interacting across sectors and scales. Only a truly holistic, integrated approach to water management will be sufficient to address these issues at the scale and pace required, through making use of efficient and effective multi-benefit solutions.

To be successful, any review of regulatory requirements and legislation must look across water management in the round.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 88 organisations to protect the natural world. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales

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This response is supported by the following organisations:

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