

# Blueprint for Water response – Ofwat’s Forward Programme 2025-2026

28<sup>th</sup> February 2025

This response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)). The response is supported by Freshwater Habitats Trust, Friends of the Earth England, Institute of Fisheries Management, Marine Conservation Society, Planet Patrol, River Action, RSPB, and The Rivers Trust.

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## Summary

Blueprint for Water welcomes the opportunity to share thoughts on Ofwat’s forward programme for 2025-2026.

This is a crucial period for nature, with targets for England’s waters to reach good health by 2027 and to halt nature’s decline by 2030 fast approaching. Ofwat and the water industry will play a central role in the achievement – or failure – of these targets.

It is also a period of opportunity, with the Cunliffe Review, Land Use Framework, and the promise of a second water bill to build on the Water (Special Measures) Act offering significant potential to reform the water system. A step change in ambition and delivery is required to ensure that this is a success. Ofwat must drive and facilitate this step change in the water sector and the system it operates.

Blueprint for Water welcomes Ofwat’s recognition of its statutory environmental responsibilities under the Water Industry Act 1991 (WIA) in the forward programme, and the need to work with partner regulators to deliver greater value and innovation, for example through greater use of nature-based solutions. However, we urge Ofwat to be bolder and more ambitious in driving nature’s recovery, and to actively work with partners such as the Environment Agency to unpick barriers to the use of green solutions and improve monitoring and reporting of delivery, particularly in relation to environmental outcomes.

Under the Water (Special Measures) Act 2025, Ofwat has a new duty to consider how the water industry can contribute towards meeting environmental targets, including those under the Climate Change Act 2008 and the Environment Act 2021. Ofwat must set out within the forward

programme document how this new duty will influence and be incorporated into regulatory work and decision making in the period 2025-2026.

We would be pleased to discuss any of the points raised in this response further.

## **Environmental priorities and objectives**

Blueprint for Water welcomes the strong recognition of the environment and related responsibilities within Ofwat's forward programme for 2025-2026, and the inclusion of 'protecting the environment' as a key strategic objective. Delivering Government's environmental targets must be a priority for Ofwat and should be a key driver across its work and decision making. This should be explicitly stated in the forward programme.

We therefore challenge Ofwat to be bolder and increase its ambition, to not only protect but to *improve* water body health as is required by 2027 and to actively contribute to nature's restoration throughout the water system. This will be essential to build the resilience of the sector, and to repair current relationships of distrust and dissatisfaction with consumers. As such, it should be acknowledged as a priority in the forward programme document.

The forward programme should go further to clarify the importance and benefits of Ofwat's role in improving environmental health and resilience, particularly given the application of the Growth Duty. For example, through reiterating that a healthy water environment is a prerequisite for secure, sustainable and economically resilient water sector, and clarifying the potential to deliver multiple economic and societal co-benefits through investment in green and hybrid solutions.

Furthermore, we question whether environmental expertise is sufficiently represented across all levels of Ofwat, particularly at Board level, and suggest that examining and addressing this should be an action within the forward programme for 2025-2026.

## **Working in partnership**

We welcome Ofwat's commitment to continue to work closely with partner environmental regulators in the period 2025-2026, in order to deliver greater value from investment programmes through innovation and nature-based approaches. Unlocking greater use of

nature-based solutions, where appropriate, will be critical to delivering the maximum benefit from water industry investment for both consumers and the environment.<sup>1</sup>

However, we suggest that further work is needed from both Ofwat and the Environment Agency to ensure a truly joined-up, collaborative approach and to remove barriers to greater use of nature-based and hybrid solutions.

Differences in approach between the regulators with regards to NbS and failures to work jointly to resolve issues such as permitting have meant that investment in NbS remains low within PR24 business plans.<sup>2</sup> Despite the welcome introduction of greater flexibility from Ofwat to allow companies to swap grey for hybrid or green options within AMP8, there is uncertainty about how this will work in practice given that these regulatory issues still remain. Recent developments from the Environment Agency with regards to a 'minded-to' position to discontinue Catchment Nutrient Balancing further add to this concern.<sup>3</sup>

Ofwat must increase its activity in 2025-2026 to work with Environment Agency colleagues to unpick these barriers, and to ensure that a clear, consistent approach to nature-based solutions is being taken across regulators.

A strong, collaborative approach from Ofwat and the Environment Agency will also be needed to monitor and ensure successful implementation of PR24 business plans.

As the document acknowledges, this is the largest investment programme since privatisation; it is crucial that the maximum environmental and social value is delivered through this record investment. Companies must be held to account on delivering their societal and environmental commitments, and consumers must be confident that funds from their bills are being spent appropriately. Regulatory oversight and monitoring should function to detect any potential issues with implementation and likely non-compliance as soon as possible, allowing swift action to be taken to get back on track. Yet as the recent case opened into Thames Water shows, this is not always happening.<sup>4</sup>

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<sup>1</sup> Wildlife and Countryside Link. (2023). 'Working with nature to restore the water environment'. [WCL Briefing Nature Based Solutions Water December 2023.pdf](#)

<sup>2</sup> Wildlife and Countryside Link. (2024). 'Achieving Environmental Ambitions'. [WCL Blueprint PR24 Scorecard Sept 2024.pdf](#)

<sup>3</sup> Wildlife and Countryside Link. (2024). Letter to Philip Duffy re: Catchment Nutrient Balancing. [WCL Letter CNB Jan 2025.pdf](#)

<sup>4</sup> [Enforcement case into Thames Water's potential delays in meeting key environmental protection programmes - Ofwat](#)

We therefore welcome proposals in the forward programme to enhance monitoring and oversight processes, with the aim to increase early visibility of issues, but would welcome further detail and explanation from Ofwat as to how this will be achieved. We would also welcome the opportunity for consultation and scrutiny of these proposals, once developed.

In our PR24 scorecard 'Achieving Environmental Ambitions', and in our response<sup>5</sup> to the PR24 draft determination, Blueprint for Water flagged concerns with a lack of transparency and clarity of information; most notably, that it was in many cases impossible to tell from company plans what the environmental *outcomes* of the proposed investment would be. For example, what the proposed spend would mean in terms of progress towards the Environment Act targets, or in terms of resolving Reasons for Not Achieving Good Status (RNAGS) under WFD. This lack of information on outcomes undermines the ability of stakeholders to meaningfully scrutinise company activity, and prevents understanding of how water companies are contributing to the delivery of their duty as regards environmental targets.

Ofwat and the Environment Agency must work more closely to improve communication of not only the delivery of company plans, but also what this means in terms of progress towards environmental targets. This should be included within the forward programme for 2025-2026, to ensure this can be embedded for AMP8, rather than being delayed until PR29.

## Engaging with eNGOs

Blueprint for Water has greatly valued the opportunity to engage with environmental colleagues at Ofwat throughout the PR24 process.

In particular, we have welcomed opportunities to discuss and 'workshop' ideas, and feel that these forms of stakeholder engagement offer the greatest value. In comparison, more passive forms of engagement such as short webinars have been useful in terms of providing updates but do not present the same opportunities to discuss and share views.

With work already underway on PR29, we encourage Ofwat to continue this focus on active engagement with stakeholders, to make use of the expertise and experience that eNGOs can bring, particularly with regards to building the evidence base for and unlocking greater use of nature-based and hybrid solutions. The forward programme document acknowledges the need

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<sup>5</sup> Wildlife and Countryside Link. (2024). 'Blueprint for Water response: Consultation on Ofwat PR24 draft determinations'. [WCL Blueprint PR24 Draft Determination Response August 2024.pdf](#)

to ‘encourage collaborative approaches to further the development’ of these options; we are keen to work with Ofwat colleagues to deliver this. The forward programme document should clarify how Ofwat will look to engage with stakeholders beyond partner regulators, such as eNGOs and consumers, in the period 2025-2026.

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Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 86 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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This response is supported by the following organisations:

- Freshwater Habitats Trust
- Friends of the Earth England
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