

Blueprint for Water

WATER PEOPLE NATURE

BLUEPRINT FOR PR19

OUR ENVIRONMENTAL SCORECARD



Wildlife and
Countryside



www.blueprintforwater.org.uk

BLUEPRINT FOR WATER - OUR VISION

Water Matters: it is integral to our lives for drinking, health and recreation, as well as critical to the lives of all plants and animals. All waters and wetlands, from our ponds and rivers to our seas should be alive with the splashing, buzzing and croaking of flourishing wildlife. By working together and managing our water more sensitively, we can ensure a future full of wildlife-rich places that everyone can explore and enjoy.

THE BLUEPRINT FOR PR19

In May 2017 the Blueprint for Water coalition published our **Blueprint for PR19**. It set out our view of the environmental challenges and opportunities facing the water sector in England. It also set out 17 things we wanted water companies to commit to in their PR19 business plans for 2020 to 2025 (see Table 1) to ensure that the £5bn plus to be spent on behalf of customers works for people and wildlife.

We are pleased that the majority of water companies were receptive to our ideas and have positively engaged with us in the development of their plans. A number of water companies proactively used our Blueprint for PR19 to benchmark their emerging plans. All water companies have also provided feedback to us in the development of our Blueprint for PR19 Environmental Scorecard.

OUR PR19 ENVIRONMENTAL SCORECARD

Now the business plans have been published, we have assessed how well we think the water companies have responded to our asks on the environment and whether their performance commitments reflect our priorities for securing a better environment for wildlife and people.

There is variation between the commitments of the companies, and the scorecards within this document summarise our assessment. More detail of the analysis underpinning our assessment can be **found here**. Our assessment is based on the future plans and commitments of water companies. The commitments in the plans are only the start and the proof will be seen in how water companies deliver these commitments over the next five years. Further information on their current environmental performance can be found at **discoverwater.co.uk** and in the **Environment Agency's Environmental Performance Assessment**.

Overall, we believe we have seen a positive step change in environmental ambition from the water sector in this planning cycle compared to PR14 business plans. Over £5 billion will be invested in environmental improvements over the next 5 years. This includes over 350 catchment management projects to deal with environmental problems at source rather than end of pipe; commitments to reduce leakage by more than 15%; to reduce water demand and to deal with unsustainable abstraction. A number of companies will also be assessing the natural capital they depend on and starting to factor it into future decision making.

However, despite good progress by the water sector, our analysis has highlighted a number of important areas where we feel more must be done, including:

- a greater range of techniques should be used to *incentivise* customers to reduce their water consumption, particularly during times / in locations where the environment is most sensitive, for example in periods of drought. We want all water companies to aim to reduce water consumption to below 100lpppd by 2050
- by PR24, we expect all companies to be factoring the value of natural capital into their planning and decision making
- companies should have a much stronger, more public voice on policy issues to better represent the interests of their customers and the environment they depend on to operate
- water companies need to do more to commit to zero pollution incidents alongside monitoring of combined sewer overflow and self-reporting of sewage incidents

Additionally, we look forward to the development of water companies' first drainage and wastewater management plans and we hope that they make further commitments towards reducing pollution and the frequency of combined sewer overflows.

There are 4 overarching outcomes broken down into 17 asks...

Headline Outcomes	Table 1 - The 17 Blueprint for Water PR19 Asks	Ref
A: Protect and restore catchments from source to sea	Companies commit to addressing their pressures on the environment, including contributing towards ensuring 75% of water bodies achieve 'good' status by 2027 , as required by the WFD.	A1
	Companies significantly extend investment in catchment management supporting delivery of water resources and wastewater outcomes. Companies show leadership in the Catchment Based Approach and commit to working with partners, sharing best practice and to valuing the benefits of this approach to water quality, water resources, flood risk, carbon and recreation.	A2
	Companies advocate the use of regulatory measures when voluntary measures are insufficient to protect water sources and customer interests (e.g. controls on agricultural pollution).	A3
	Companies set out how they will deliver and report on long term resilience and the resilience of the ecosystems they rely on to operate, in their investment planning.	A4
	Companies commit to assessing the Natural Capital they depend on with the intent to grow it and to integrate it into decision making.	A5
B: Stop pollution of our waters	Companies underpin investments by long term strategic wastewater plans , to ensure sewerage and treatment systems are sufficient into the future to prevent pollution incidents, CSO spills and flooding, despite population growth and climate change.	B1
	Companies extend investment in green infrastructure and SUDs (new and retrofit) to reduce flooding and provide biodiversity, recreation and water quality benefits.	B2
	Companies aim for zero pollution incidents (categories 1, 2 and 3), 100% monitoring of CSOs and 100% self-reporting of incidents.	B3
	Companies include ongoing monitoring of the presence and treatability of emerging pollutants (pesticides, pharmaceuticals, microplastics), using results to inform appropriate management (product and usage controls, upgraded treatment, including natural solutions).	B4
C: Use water wisely and price water fairly	Companies significantly scale up their demand management programmes to increase resilience, defaulting to equal investment in demand and supply, unless they can justify why not. This includes ambitious water efficiency measures, both products and behaviour change engagement, increasing overall metering of households as well as the proportion of smart meters and reducing leakage.	C1
	Companies ensure no overall increase in the amount of water abstracted from rivers and groundwater despite increases in population and climate change – a water neutral PR19.	C2
	Companies increase the availability, promotion and take-up of social tariffs and efficiency retrofit to protect vulnerable customers and all those struggling to afford their bills – combining these with water efficiency measures to help manage bills down.	C3
	Companies develop plans to incentivise customers and communities to reduce consumption during dry periods and in catchments most at risk from abstraction – setting out specific and ambitious programmes to manage demand during periods of peak use.	C4
D: Keep our rivers flowing and wetlands wet	Companies commit to addressing abstraction where it is preventing achievement of 'good' status or poses a risk of deterioration .	D1
	Companies use mechanisms such as the Abstraction Incentive Mechanism (AIM) to reduce abstraction pressure around sensitive sources.	D2
	Companies give material consideration to the value of natural capital and benefits of water left in the environment within water resource options appraisals.	D3
	Companies ensure that, where new water supply options are considered they are transparent about environmental risk and include mitigation measures to support good status.	D4

OVERALL SUMMARY OF BLUEPRINT FOR WATER'S FINDINGS

Water & Sewerage Company	PR19 Ranking Based on Main Plan Content (Scorecard 1 below)	PR14 Ranking (for comparison)	Ranking based on Relevant Common Performance Commitments (Scorecard 2 below)	Number of Relevant Bespoke Commitments (Scorecard 3 below)
South West Water	1	(3)	=1	14
Northumbrian Water	=2	(9)	=1	12
Anglian Water	=2	(8)	7	9
Wessex Water	4	(2)	=4	17
Southern Water	5	(4)	=1	18
United Utilities	=6	(1)	6	10
Yorkshire Water	=6	(5)	=4	16
Thames Water	8	(7)	9	14
Severn Trent Water	9	(6)	8	14

Water Only Company	PR19 Ranking Based on Main Plan Content (Scorecard 1 below)	PR14 Ranking (for comparison)	Ranking based on Relevant Common Performance Commitments (Scorecard 2 below)	Number of Relevant Bespoke Commitments (Scorecard 3 below)
South East Water	1	(3)	=1	10
SES Water	2	(8)	6	9
Bristol Water	=3	(4)	=1	8
Affinity Water	=3	(1)	5	6
Portsmouth Water	5	(2)	4	7
Cambridge & South Staffs Water	6	(5/6)	3	8

For the water and sewerage companies Northumbrian, South West and Anglian Water come out top in our assessment of how well their main business plan document reflected our environmental asks.

South West Water, Southern Water and Northumbrian Water also do well in terms of the level of ambition of their common performance commitments most relevant to our environmental asks.

Southern Water and Wessex Water had the greatest number and coverage of bespoke performance commitments relevant to our environmental asks.

For the water only companies South East Water is the standout performer closely followed by SES Water.

Further detail, including individual scorecards, is provided below for each of the three elements of our assessment.



BLUEPRINT BLUE STARS ★

Projects from six companies have been awarded **Blueprint "Blue Stars"** – selected by Blueprint members and awarded for innovation or stand out ambition for the scope of the project.

They are:

- Severn Trent Water for their bespoke commitment to **biodiversity enhancement**
- Southern Water for their **Target 100** demand management initiative
- Anglian Water for their bespoke commitment on **Natural Capital**
- Thames Water for their **Smarter Catchments** initiative
- Portsmouth Water for the commitment in their Business Plan to addressing the **impacts of abstraction**
- South East Water for their ongoing commitment to working with stakeholders on **catchment management**

SCORECARD 1

HOW THE MAIN PR19 BUSINESS PLAN DOCUMENTS REFLECT OUR ASKS

To see how well the business plans reflected our 17 asks, a qualitative review of the main business plan document for each company was undertaken using a range of key words. Relevant material in business plan summary documents and appendices was also considered providing it was specifically signposted within the main plan document.

Where the links to our asks are considered by Blueprint to be strong they are graded dark

green, where moderate they are graded light green. Where weak/no links were found they are orange and where not relevant they are blank.

It is heartening to see how well our asks are reflected in the plans although it does appear plans could be stronger on incentivising customers to reduce water use during dry weather, and not all companies have commitments in their main plan to integrating natural capital into their decision making during PR19.

- Dark Green = 3** good reflection of ask in business plan
- light green = 2** moderate reflection of ask in business plan
- Orange = 0** weak/no reflection of ask in business plan

Water and Sewerage Companies / Blueprint for PR19 Asks	ASK A Protect and restore catchments from source to sea					ASK B Stop pollution of our waters			
	A1 Addressing pressures on the environment.	A2 Significantly extending investment in catchment management.	A3 Advocating the use of regulatory measures when voluntary measures are insufficient.	A4 Delivering & reporting on the resilience of the ecosystems companies rely on to operate.	A5 Committing to assessing & growing Natural Capital, & integrating it into decision making.	B1 Developing & acting upon long term strategic wastewater plans.	B2 Extending investment in green infrastructure and SUDs.	B3 Aiming for zero pollution incidents, & improved monitoring and reporting.	B4 Planning to monitor for emerging pollutants & determine appropriate management.
South West Water	Dark Green	Dark Green	Orange	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Northumbrian Water	Dark Green	Dark Green	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Anglian Water	Dark Green	Dark Green	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Wessex Water	Dark Green	Dark Green	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Southern Water	Dark Green	Dark Green	Orange	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
United Utilities	Dark Green	Dark Green	Orange	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Yorkshire Water	Light Green	Dark Green	Orange	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Thames Water	Dark Green	Dark Green	Orange	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green
Severn Trent Water	Dark Green	Dark Green	Orange	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green

Water Only Companies / Blueprint for PR19 Asks	ASK A Protect and restore catchments from source to sea					ASK B Stop pollution of our waters			
	South East Water	Dark Green	Dark Green	Light Green	Dark Green	Dark Green	N/A	N/A	N/A
SES Water	Dark Green	Dark Green	Light Green	Dark Green	Orange	N/A	N/A	N/A	Orange
Bristol Water	Light Green	Dark Green	Orange	Light Green	Light Green	N/A	N/A	N/A	Orange
Affinity Water	Dark Green	Dark Green	Orange	Light Green	Light Green	N/A	N/A	N/A	Orange
Portsmouth Water	Dark Green	Dark Green	Orange	Light Green	Light Green	N/A	N/A	N/A	Orange
Cambridge & South Staffs Water	Dark Green	Dark Green	Orange	Orange	Orange	N/A	N/A	N/A	Light Green

ASK C Use water wisely and price water fairly				ASK D Keep our rivers flowing and our wetlands wet			Total Score	Rank
C1 Committing to significant increase in demand management programmes.	C2 Ensuring no overall increase in the amount of water abstracted (a water neutral PR19).	C3 Increasing the availability, promotion and take-up of social tariffs & efficiency retrofit.	C4 Incentivising customers to reduce consumption when /where it's most harmful.	D1 Addressing abstraction where it causes / risks failure of WFD targets.	D2 Using (e.g.) the Abstraction Incentive Mechanism (AIM) to reduce abstraction pressure.	D3 Considering natural capital within water resource options appraisals.		
Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	43	1
Dark Green	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Orange	41	=2
Dark Green	Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	41	=2
Dark Green	Dark Green	Dark Green	Orange	Dark Green	Dark Green	Dark Green	40	4
Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	38	5
Light Green	Dark Green	Dark Green	Orange	Dark Green	Dark Green	Dark Green	37	=6
Dark Green	Dark Green	Dark Green	Orange	Dark Green	Dark Green	Dark Green	37	=6
Dark Green	Orange	Dark Green	Orange	Dark Green	Dark Green	Orange	34	8
Dark Green	Light Green	Dark Green	Orange	Dark Green	Dark Green	Orange	33	9

ASK C Use water wisely and price water fairly				ASK D Keep our rivers flowing and our wetlands wet			Total Score	Rank
Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Orange		
Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Light Green	26	2
Light Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	25	=3
Dark Green	Dark Green	Dark Green	Orange	Dark Green	Dark Green	Light Green	25	=3
Dark Green	Dark Green	Dark Green	Orange	Dark Green	Dark Green	Orange	23	5
Light Green	Orange	Dark Green	Orange	Dark Green	Dark Green	Orange	17	6

Note: Due to time and budget limitations we have only been able to consider material either in the formal business plan and its summary or material specifically referenced from it. We believe the plans submitted to Ofwat contained the most concrete commitments.

SCORECARD 2

THE COMMON COMMITMENTS – HOW THE WATER COMPANIES’ COMMON PERFORMANCE COMMITMENTS FOR PR19 REFLECT OUR ASKS

OFWAT asked each water company to put forward their proposals against a set of common performance commitment areas. For those common commitments most relevant to our environmental asks (pollution, leakage, water consumption, sewer flooding, drought restrictions) we have compared their proposals and ranked the companies based on where they plan to get to by the end of the next investment period and how big a jump that is from the start of it. The tables below present the rankings and the actual data for 2024/25.

Northumbrian have sector-leading ambition on avoiding pollution incidents, Wessex Yorkshire, Southern and Anglian are leading on leakage and per capita consumption.

Bristol Water and South East Water lead the way for the Water Only Companies primarily because of their ambition on leakage and, in the case of Bristol Water, on per capita consumption. Blueprint strongly believe that it is feasible for all water companies to reduce water consumption to below 100lpppd by 2050, and urge all companies to implement ambitious demand management measures to help achieve this.

Water Company	Overall Rank based on Relevant Common Performance Commitments	A. Protect and restore catchments to source to sea	B. Stop pollution of our waters	C. Use water wisely and price water fairly	D. Keep our rivers flowing and wetlands wet
South West Water	=1	5.0	1.0	6.0	3.5
Southern Water	=1	5.0	4.5	2.5	3.5
Northumbrian Water	=1	5.0	3.0	4.0	3.5
Yorkshire Water	=4	5.0	9.0	1.0	3.5
Wessex Water	=4	5.0	2.0	8.5	3.5
United Utilities	6	5.0	7.0	6.0	3.5
Anglian Water	7	5.0	8.0	2.5	7.0
Severn Trent Water	8	5.0	6.0	6.0	8.0
Thames Water	9	5.0	4.5	8.5	9.0

Bristol Water	=1	4.0	N/A	1.5	3.5
South East Water	=1	4.0	N/A	1.5	3.5
Cambridge Water	3	4.0	N/A	4.0	3.5
South Staffs Water	4	4.0	N/A	5.0	3.5
Portsmouth Water	5	4.0	N/A	6.0	3.5
Affinity Water	6	4.0	N/A	3.0	7.0
SES Water	7	4.0	N/A	7.0	3.5

Against Ask A, all companies pledged to achieve the same target (zero risk of failure to comply with water quality standards), and so achieve the same ranking across their group. For Asks B - D, scores

vary as different proposals were put forward. Common performance commitment targets which feed into the scores is provided in the table below.

Water Company	B. Stop pollution of our waters			C. Use water wisely and price water fairly				D. Keep our rivers flowing and wetlands wet
	Treatment Works compliance (%)	Pollution (nr Category 1-3 / 10,000 km of wastewater network)	Internal Sewer Flooding (% at risk)	Leakage (Ml/d)	Leakage (Leakage/km of main/day)	Leakage (l/prop/day)	Per Capita Consumption (l/head/day)	Risk of Sever Restriction in a Drought (%)
Southern Water	100.0	20.3	12.4	89.6	6.3	75.0	120.0	0.0
Northumbrian Water	99.0	14.3	16.0	117.7	6.6	93.1	136.0	0.0
Wessex Water	100.0	17.0	8.4	66.4	5.4	101.0	127.9	0.0
Yorkshire Water	98.7	22.0	27.2	175.0	5.4	71.0	119.3	0.0
South West Water	100.0	19.0	28.3	100.2	5.4	90.3	128.7	0.0
Severn Trent Water	100.0	22.5	4.0	323.0	6.8	85.7	128.6	58.2
Anglian Water	99.0	21.0	9.8	142.2	3.5	62.9	130.7	0.0
Thames Water	100.0	23.0	9.9	540.3	16.5	122.9	136.0	76.9
United Utilities	99.0	22.7	15.0	376.9	8.8	106.9	137.1	0.0

Bristol Water	N/A	N/A	N/A	36.5	5.2	62.9	135.0	0.0
South East Water	N/A	N/A	N/A	80.6	5.2	81.3	140.3	0.0
Cambridge Water	N/A	N/A	N/A	11.5	4.6	71.4	137.7	0.0
South Staffs Water	N/A	N/A	N/A	53.0	8.2	83.9	128.3	0.0
Affinity Water	N/A	N/A	N/A	142.2	8.1	89.8	133.0	41.1
SES Water	N/A	N/A	N/A	20.4	5.8	66.2	136.2	0.0
Portsmouth Water	N/A	N/A	N/A	29.6	8.7	89.3	135.0	0.0

Notes: A rank has been calculated for each performance commitment. Where there is more than one performance commitment relevant to one of the four headline asks they have been averaged. The ranking for each of the four asks been calculated using the RANK.AVG excel function. The rank for each of the four Asks have then been averaged to arrive at the overall ranking.

Three metrics were considered for leakage to allow a better, more rounded comparison of ambition, however they have been combined so that it is treated in the analysis as being of similar weight to the other performance commitments based on the target set by the company and the level of improvement this represents areas in determining the overall ranking.

We have not considered the levels of financial rewards or penalties associated with each performance commitments or any deadbands where they won't apply.

SCORECARD 3

THE BESPOKE COMMITMENTS – HOW THE WATER COMPANIES’ BESPOKE PERFORMANCE COMMITMENTS FOR PR19 REFLECT OUR ASKS

A range of bespoke performance commitments are also proposed by each company and reflect their own circumstances and their customers’ particular preferences. They are therefore difficult to compare directly and so we have collated those that we feel most closely relate to our environmental asks in the table below. The table illustrates the coverage of

each companies’ relevant bespoke commitments and the number of commitments a company has in each category and overall. The numbers, however, do not convey the level of ambition each commitment has.

It is good to see over 170 relevant environmental bespoke commitments being made and this reflects the importance that water company customers put on the environment. Of the WASCs Southern Water, and Wessex Water have the best spread of commitments across our environmental asks with South East Water leading the way for the WOCs.

Thames Water have good coverage in terms of commitments to ASK A (biodiversity, natural capital and catchment management) and Southern Water for ASK B (pollution, flooding, river bathing water quality and greenhouse gas emissions). A number of companies have commitments on natural capital which will cover a broad range of environmental factors.

		A. Protect and restore catchments from source to sea					B. Stop pollution of our waters				
Bespoke Performance Commitment Category		Biodiversity	Catchment management	Natural capital	River environment	Water Industry National Environment Programme	Surface water flooding	Sewage pollution and CSOs	River water quality		
WASC (Water and sewerage companies)	Southern Water			1			1	1	1		
	Wessex Water		1	1	1	1		1			
	Yorkshire Water		2	1	1		1				
	Severn Trent Water	2	1			1	1				
	South West Water	3						1			
	Thames Water	2	1	1	1		1				
	Northumbrian Water				1						
	United Utilities			1		2					
	Anglian Water			1		1					
TOTAL BY DESCRIPTOR		7	5	6	4	5	4	3	1		
Water only companies	South East Water	1	2			1					
	SES Water					2		1			
	Bristol Water	1			1	1					
	Cambridge & South Staffs Water	1									
	Portsmouth Water	2	1								
	Affinity Water				1						
	TOTAL BY DESCRIPTOR		5	3	0	2	4	0	1	0	

				C. Use water wisely and price water fairly					D. Keep our rivers flowing and wetlands wet		
Bathing water quality	Sewer flooding/blockages	External sewer flooding	CO2/greenhouse gas reduction	Affordability and value for money	Communication and education	Metering	Vulnerable customers	Water efficiency	AIM /abstraction	Total By Water Company	
3	1		1		2		2	4	1	18	
1	1	1	1		1		4	1	2	17	
1		1	2	1	1		3	1	1	16	
	2	1			1	1	2	1	1	14	
1	1	1		2		1	3		1	14	
	1		1		2		3		1	14	
1	3	1	1			1	3		1	12	
	1	1		1	2		1		1	10	
1		1	2				2		1	9	
8	10	7	8	4	9	3	23	7	10	124	
			1				4		1	10	
			1	1			3		1	9	
				1		1	2		1	8	
			1	1	1		2	1	1	8	
			1	1			1		1	7	
					1		2		2	6	
0	0	0	4	4	2	1	14	1	7	48	

Note: We recognise that some bespoke commitments are stronger than others and that some are reputational and/or are financial. We have not been able to factor this into our assessment. However, where we feel a bespoke commitment is sector-leading we have reflected it in the award of our Blueprint Blue Stars.

SHARED PRINCIPLES FOR COLLABORATION

We know there is still much to do to meet the challenges of climate change and population growth and to ensure that the environment that underpins our water sector is resilient and can support it. With this in mind a number of water companies (Anglian Water, Northumbrian Water, Severn Trent Water, Southern Water, Thames Water,

United Utilities, Wessex Water and Yorkshire Water) have joined Blueprint for Water coalition members in signing up to five **shared PR19 collaboration principles** to work together to meet future environmental challenges. We would welcome any further signatories.

NEXT STEPS

Looking forward, we are keen to progress tangible collaborative projects, particularly to inform future policy or improve resilience. As an example, the Blueprint eNGOs will be starting

a joint project **“Naturally Resilient”** in 2019 with a number of companies and the regulators looking at the interplay between environmental resilience and resilience in the water sector.

The development of the Blueprint for Water PR19 environmental scorecard draws on analysis undertaken for the coalition by **Artesia Consulting Ltd.** This report is dedicated to the memory of Simon Gordon-Walker, Artesia Director and project lead who passed away shortly after the start of this project, on 6th November 2018.

We would like to thank all of the organisations, partners and supporters who have provided comment and advice during the development of our Blueprint for PR19 and this scorecard.



Blueprint for Water is a campaign of Wildlife and Countryside Link