Blueprint for Water response: consultation on Water Resources Planning Guideline and Environmental Destination for Water Resources

5th December 2025

This response is on behalf of Blueprint for Water's Water Resources Group. Blueprint for Water is part of the nature and animal welfare coalition Wildlife and Countryside Link (Link).

This response is supported by Angling Trust, The Rivers Trust, The Wildlife Trusts, Waterwise.

Blueprint for Water welcomes the opportunity to respond to this consultation on the Water Resources Planning Guideline, and to provide comments on the Environmental Destination document.

Greater ambition is required to address water resources challenges. The November 2025 water resources annual performance report for the industry states that both leakage and water demand remain 'unacceptably high' and 'exceed national forecasts', which means that more water is being abstracted than expected, placing additional pressure on the water environment.[1]

The Water Resources Planning Guideline document is comprehensive, but does not currently reflect the ambition that is required. We are concerned that environmental priorities and obligations are not given sufficient weight in this planning process. For example, that some of these obligations are listed as 'should' when they relate to statutory targets, and that language regarding environmental actions is generally quite weak. We identify specific examples and make recommendations for how this could be addressed in our response.

Greater emphasis is also required on monitoring and evaluation of actions taken, to assess impacts and outcomes, and what this means in terms of progress – for example, towards targets under the Environment Act, and in terms of improving the health and status of waterbodies.

We also include thoughts on the 'Environmental Destination for Water Resources' document in this consultation response.

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

[1] Water resources 2024 to 2025: analysis of the water industry's annual water resources performance - GOV.UK

Questions

Question 1: Do you have any concerns regarding the guideline that you would like to highlight?

The consultation document states that in the guidelines, 'must' is used to convey relevant statutory requirements and Government policy, whereas 'should' reflects what the Environment Agency *believes* is required, with the option for companies to take a different approach if adequate justification is supplied.

We are therefore concerned by the use of 'should' in some instances related to environmental aspects and obligations.

For example, in Section 1.6. 'Links with Other Plans', the document states that companies 'should reflect the ambitious nature of the Government's Environmental Improvement Plan', including that companies 'should' set out their destination for environmental sustainability and resilience, use a catchment approach, and support achievement of the water demand targets. Given that the Environmental Improvement Plan drives progress towards legally-binding targets under the Environment Act 2021, and that water companies have a significant role to play in achieving those targets, these elements 'must' be required within plans.

Language regarding the environment requires strengthening throughout the document. For example, in Section 2.2., the guideline states that regional plans should only 'seek to' achieve various environmental outcomes, such as sustainable abstraction at catchment level and improved environmental resilience. These should be priority outcomes of regional planning, and therefore requirements of the process; the language must be strengthened to reflect this.

The relatively weak language used in relation to environmental obligations is contrasted by the heavy duty on water companies to consider planning and growth. Yet the guideline document does not sufficiently explain how local planning and changes to Government policy introduced after WRMPs were finalised should be accounted for, particularly given that water companies are not statutory planning consultees.

Furthermore, as discussed further in our response under Question 3, the recent publication of the Environmental Improvement Plan 2025 is clear that Government is placing significant focus on tackling water shortfalls as a barrier to growth; this should be reflected in the guideline document.

We echo concerns raised by other eNGOs that there is a disappointing lack of focus on demand management and water efficiency programme measures within the guideline document. The guideline document should be updated to better reflect what is stated in the National Framework for Water Resources.

Question 2: Do you have any suggested improvements to the guideline that you would like to make? If you do, please provide your suggested edits.

The guideline should go further to emphasise the importance of protecting and enhancing the environment, and should encourage greater ambition from the water industry in this regard.

For example, in section 1.3. whilst it is welcome that the guideline states that plans must demonstrate how companies 'will ensure secure supplies while protecting and enhancing the environment', this should be strengthened to clarify that the needs of the environment – both current and future – must be met *first*.

Similarly, given the significant role that environmental sustainability plays in driving the water resources shortfalls set out in the WRNF 2025, section 5.4 of the guideline is relatively concise. One opportunity to strengthen the environmental language and narrative would be to set out here more explicitly the consideration that should be given to chalk streams; a topic of considerable public and political interest. A third of chalk waterbodies do not have a hydrological regime that supports Good status – and even in many of those that do, abstraction impacts seen within the waterbody can be severe, yet no action is required if there is compliance with the EFI at the monitoring point. Chalk streams are a specific feature picked out in the Environmental Destination scenarios, and it would be helpful for the planning guideline to give weight to their consideration in company planning. This should include where relevant planning in investigations into abstraction impacts beyond just EFI compliance.

In section 1.4.3., reference to Ofwat's role in furthering the resilience objective to 'secure the long-term resilience of companies' systems' should explicitly state that this must include the resilience of the natural environment.

In section 4, the introduction on the 'Basis of Planning' states that plans should 'deliver value for money for your customers', and should 'reflect wider societal values and government expectations'. This section should explicitly reference environmental obligations, for example that the plan should be delivering progress toward the Environment Act targets, or that wider societal values include expectation for a clean and healthy water environment.

We are pleased to note the cross-reference to flood management strategies and plans within the document. Managing water holistically will build resilience to both flooding and drought and will offer opportunities to take efficient and effective action through multi-benefit solutions at catchment scale. The guideline document should go further to make this connection explicit in Section 1.6. J, which currently explains what national and local flood

risk management strategies are but does not set out how companies should be factoring this into their water resources planning.

The guideline doc should expand further on accessibility requirements, to ensure that the water resources plans are accessible and understandable to stakeholders. Further to stating that the main plan technical document must be understandable in Section 3.4., the guideline should further expand on accessibility requirements; for example, accessible presentation of data in addition to the provision of raw data tables, and minimum requirements for formatting and style. Furthermore, in line with the work currently being undertaken by the Agency in collaboration with Ofwat and others through the 'Clear Waters' project, the guideline doc should explain that plans should set out anticipated outcomes and impacts on the environment in addition to stating actions and spend.

Question 3: Do you have any other comments about the guideline that you would like to make?

Given the recent publication of the Environmental Improvement Plan 2025, the guideline should highlight the increased emphasis on water resources actions within the EIP; measures around household, non-household water use and leakage which featured in the narrative of the EIP23 are now given as specific commitments (30,31,32,33), all underpinned by commitment 34 "Ensure water companies deliver their water resources management plans, eliminating the water supply demand gap that grows to 5 billion litres a day by 2050". This highlights the clear focus the government is placing on tackling water shortfalls as a barrier to growth, and this significance should be reflected in the guideline.

Question 4: Do you believe that the guideline allows water companies to produce plans with secure and resilient water supplies which protect the environment?

Don't Know

If no, how do you think the guidance should be improved? Please provide specific comments to support your response

As discussed in response to Qs 1 and 2, the guidance document needs to do more to emphasise and prioritise the importance of protecting and enhancing the environment, and to require monitoring and evaluation of the impacts and outcomes of action taken. Without this, it is unclear whether the guideline will allow companies to produce plans with secure and resilient water supplies which protect the environment.

We would welcome further detail from the Agency regarding any testing or monitoring that has been undertaken to test this.

Environmental Destination for Water Resources

Further to the consultation questions, we set out some comments from Blueprint for Water on the 'Environmental Destination for Water Resources' document below.

Overarching comments

Following the final report of the Independent Water Commission, Government will be publishing a water White Paper, followed by a Bill, to address the recommendations made and to deliver water reforms. This will potentially have significant implications for water resources planning, particularly at the regional level, and for wider plans and processes that water resources planning will inform and be informed by, such as River Basin Management Plans.

We would therefore welcome the opportunity to further discuss the Environmental Destination document with the Agency once Government's White Paper has been published.

Specific environmental considerations

The document considers the level of protection provided for SSSIs under the baseline and current / intermediate / full scenarios, but could usefully clarify in s4.1 that additional obligations apply (under both the Habitats Directive and Water Framework Directive Regulations) relating to those SSSIs which are *also* a Protected Area (water-dependent Natura 2000 sites). This is set out in section 7.4.1 but it should be clearer when discussing the scenarios that certain environmental obligations apply throughout and should be embedded in optioneering regardless of which scenarios are being considered.

It is also important to note that the health of some Protected Areas is dependent upon groundwater waterbodies, and therefore the balance tests for those groundwaters become relevant here even though the groundwater itself is not a Protected Area.

Stakeholder engagement

It is welcome that the Environmental Destination document emphasises the need for early stakeholder engagement to inform priorities for action, and that this explicitly includes eNGOs, local environmental groups, and catchment partnerships.

However, the complexity of the Environmental Destination work could undermine the impact of this stakeholder engagement, unless this is well explained and fully transparent – for example, if it is not clear to stakeholders what the workings behind and process have been to develop the Environmental Destination, or how and when to get involved.

Stakeholder engagement must be pitched appropriately depending on the audience, varying the level of technical detail and provision of further materials such as raw data as appropriate.

The Agency should report annually on progress towards sustainable abstraction, clarifying where action is proceeding, what progress has been made, and identifying any issues. This reporting must be available and accessible to all stakeholders, and should include detail on outcomes. It should also be explicit about where changes have been made to remove headroom, providing future protection against unsustainable abstraction, versus where existing abstraction has been reduced, contributing to improvements now.

The role of the Environment Agency

We would welcome further clarity on the role of the Environment Agency in the Environmental Destination. It is currently unclear as to what extent the Agency, or indeed other environmental regulators such as Natural England, will be involved in the Environmental Destination work; the document places significant emphasis on the role of regional groups. It is important that the Agency maintains a strong role within Environmental Destination work, to ensure join up across plans and processes - for example, the Programme of Measures under River Basin Management Plans.

The Agency should also have a role in quality assurance of the cost assessment aspects of options appraisal. This is important since many environmental deliverables include an element of cost consideration – described as 'Statutory-plus' in the WISER; 'legal requirements where economic evidence forms part of the decision-making process'. This typically considers the balance of costs and benefits, and affordability considerations, and where action is considered disproportionately expensive, alternative objectives or timescales to meet them may be set. Resultantly, the quality of the economic appraisal is paramount as it determines whether or not particular interventions to protect the environment can be taken forward. In s8.3.1, as well as setting out the cost information that should be provided, the guideline should detail how EA will input to or scrutinise cost information to ensure that any costings that result in lower objectives or longer timeframes being accepted are robust.

Detail on actions and timescales

The Environmental Destination document would benefit from further detail in places, to clarify what action has been taken thus far, actions and measures secured in terms of next steps, and anticipated timescales.

Further detail could also be provided to clarify the (anticipated) impact of wider factors – for example, if there have previously been blockers preventing action, or if there have been

wider policy changes or measures implemented that will have implications for Environmental Destination.

Further comments

Blueprint for Water echoes concerns raised by other eNGOs regarding the suggested approach to prioritisation within the Environmental Destination, whereby the Agency states that it will only make changes to abstraction licences when there is 'evidence that they are currently having an ecological impact or present a risk to the environment'.

As others have raised, requiring that evidence of ecological impact must be in place before action can be taken risks delays and therefore further harm, particularly given known challenges with linking the impacts of abstraction directly to ecology. Prioritising action in areas where the most benefit can be delivered is a sensible approach, but this can be achieved without such a requirement for direct evidence of ecological impact being in place first. Indeed, greater benefit may be achieved by intervening early and preventing harms from happening in the first place, rather than waiting for them to manifest or to become so significant that ecological harm is unequivocal. In line with environmental principles, we suggest that a more precautionary approach should be adopted.

For questions or further information please contact:

Ellie Ward, Principal Policy Officer, Wildlife and Countryside Link
E: eleanor@wcl.org.uk

Wildlife & Countryside Link, Vox Studios, 1 – 45 Durham Street, Vauxhall, London, SE11 5JH
www.wcl.org.uk

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- Angling Trust
- The Rivers Trust
- The Wildlife Trusts
- Waterwise