



Ofwat Consultation

PR24 and Beyond: Creating tomorrow together

Response from British Canoeing

1. Introduction

1.1 British Canoeing is the National Governing Body for paddlesports in the UK, ranging from the recreational participant to the international athlete and the membership body for England and is responsible for developing the sport within England. The purpose of British Canoeing is to inspire people to pursue a passion for paddling for health, enjoyment and friendship, challenge and achievement. We are committed to protecting the places we paddle and enhance the freedom to paddle and promote the interests of all paddlers.

1.2 There has never been a more important time to enable people to be active and to connect with nature. There is a growing body of evidence that demonstrates that greater access to green and blue spaces can help tackle some of the biggest challenges we face, from the climate emergency to rising obesity and the mental-health crisis. Covid-19 has brought into even sharper focus the importance of people being active outdoors.

1.3 Participation in paddlesports and swimming during the Covid-19 pandemic has seen a dramatic increase. British Canoeing membership rose from 38,500 to 79,500, with females and families showing the strongest growth. It is estimated that 5.6million people took part in paddling activities in 2020.¹

1.4 Yet pollution in our rivers and waterways is threatening the health of recreational waterway users as well as harming our precious natural environment. Our health and wellbeing is being put at great risk by the potential transmission of viruses carried in raw untreated sewage that has been discharged into our rivers.

2. Response to Ofwat's selected questions

2.1 As a member of the Wildlife and Countryside Link coalition, British Canoeing has fully endorsed the recommendations put forward by Wildlife and Countryside Link in response to Ofwat's PR24 and Beyond: Creating tomorrow together. British Canoeing would like to take the opportunity to respond further in the following areas:

Q 2.1: Do you agree that the themes we have suggested for PR24 are appropriate for England?

2.2.1 British Canoeing supports the 4 key themes, particularly 'greater environmental and social value' and strongly agree with Ofwats vision '*to see [water] companies deliver even more environmental and social value by exploring different approaches to their core activities...For example, nature-based solutions can not only deliver direct benefits like better water quality, but can also improve biodiversity, reduce flooding, reduce emissions, and help to eliminate harm from storm overflows.*'

¹Watersports Survey 2020 - the Nursery research and planning (Nov 2020)

2.2.2 As paddlers we need blue spaces that are healthy and thriving in biodiversity and free from pollution to enjoy our sport and connect with nature. Indeed activity in blue environments has a number of positive effects that go far beyond just the benefits of being physically active such as, increasing people's overall feelings of wellbeing, their quality of life, happiness and life satisfaction.

2.2.3 When linked to the outcomes relating to the participation in outdoor sport, access to blue space can improve 'Active Citizenship', including improved social inclusion, integration, volunteering Community cohesion, and the reduction of crime and antisocial behaviour.

2.2.4 Activities like paddlesports that take place in the outdoors offer unparalleled opportunities to develop independence, resilience, connection to nature and promote health and wellbeing benefits amongst our young people.

2.2.5 Ethnically Diverse and lower socio-economic groups have been hit the hardest by the pandemic, yet we know people from these groups are less likely to access blue space than other people. Healthy and accessible blue spaces are absolutely critical, access to active environments on our doorstep are the foundation stone for an active nation really improving the social value of our blue spaces.

Q 5.7: Which areas should we be considering targeted challenges for at PR24, and why?

2.3.1 British Canoeing would particularly welcome targeted challenges around wastewater discharges, which prevent untreated sewage pollution being discharged into our bluespaces enjoyed by paddlers and other recreational users.

2.3.2 British Canoeing would suggest that a target for zero pollution incidents across ALL categories by 2030 should be set, with 5.6 million people taking to paddlesports alone in 2020, plus a growing number of wild swimmers, the protection of public health should be paramount.

2.3.3 We suggest that targets for bringing CSOs up to standard (asset health), and taking action to deal with the most significant spillers, should be set, in the context of a long term aspiration to progressively reduce reliance on Storm Overflows altogether. The DWMP framework should help to prioritise delivery, and identify options for reducing overflow operation, including by tackling customer-driven events (sewer misuse) and by reducing surface water ingress to the sewer system, including through the use of nature based solutions.

Q 5.8: Should we use innovation specific incentive mechanisms at PR24? If so, what would these be, and what would they add in addition to the other mechanisms outlined in this chapter?

2.4 Innovation to encourage use and monitoring of key nature-based solutions would be helpful, providing an incentive where other drivers may be a deterrent, e.g. penalties for underperformance may deter novel approaches with less certain outcomes.

Q 9.1: What kinds of performance commitments should we include in the price review? What outcomes require financial incentives for all companies for the foreseeable future?

2.5.1 British Canoeing support Ofwat continuing to use a number of common performance commitments, however these should be focussed on issues and outcomes of significant importance for society, customers and the environment.

2.5.2 Specifically performance commitments around wastewater discharge and management will be important and must include pollution incidents, use of nature-based solutions, and action on Storm Overflows.

Q 9.4: What should be our aim in setting the levels of performance commitments? Do you agree with the proposal that performance commitment levels should be set, as a starting point, at what can be achieved by an efficient company with base costs and that deviations from this are proposed in company business plans? If not, what alternative proposals should we consider?

2.6.1 It is essential that any performance commitment does not 'reward' inefficient companies for previous under-investment, and that the levels at which penalties and incentives are set do not create unjust outcomes, such as it being cheaper overall to accept a penalty than to invest in delivering an outcome.

Q 10.4: Do we need to amend our cost assessment approach to take account of nature-based solutions?

2.7.1 It would be beneficial for Ofwat to consider natural capital assessments as a framework by which nature-based solutions can be assessed, to account for the wider benefits that they provide to customers, society and the environment. This should be based on net present value rather than just in-AMP investment. To enable the mainstreaming of nature-based solutions, Ofwat should encourage and promote consistent approaches to natural capital assessments across the industry.

2.7.2 Ofwat should consider a cost assessment process that addresses nature-based solutions - that deliver value beyond regulatory or statutory requirements - in the same way as capital solutions are addressed. Disincentives to investment in nature-based solutions, such as the lack of allowance for future maintenance costs, must be addressed.

For Further information please contact Chantelle Grundy, Access and Environment Officer

[REDACTED]