



The Worshipful Company of Water Conservators

Response to the Ofwat 2026 Consultation: the future of RAPID

21st July 2026

Key RAPID Proposed Changes

Combined Gated Process: Ofwat and RAPID have integrated early project planning (Gates A to D) with later delivery stages into one continuous, streamlined process to reduce duplication.

Increased Oversight: A newly introduced "Gate F" is designed specifically to oversee the operation and maintenance phases of major schemes.

Competitive Tendering: Ofwat's PR24 methodology encourages the competitive tendering of large Strategic Resource Options (SROs), allowing third parties to design, build, finance, and operate / maintain large-scale water facilities.

These proposals present a combination of accelerated funding pathways and tighter regulatory staging. For major contractors these shifts pose significant risks alongside strategic opportunities considered above.

The key risks of RAPID/MWIP changes are:

Regulatory Ex-Post Challenges: Despite Ofwat's intention to streamline reviews, combining early-stage RAPID gates with later-stage delivery stages could tighten financial scrutiny, risking previously approved allowances if ex-post challenges are triggered.

Constrained Timelines vs. Delivery Bottlenecks: Accelerated gating combined with expanded industry targets (including consultations to bring wastewater megaprojects under RAPID) creates execution risks, especially if skilled labour and supply chain capacities are stretched.

Extended Uncertainty: Regulatory volatility—such as industry-wide cost shocks or shifting environmental targets—leaves contractors exposed to elongated project planning phases before main construction (DCO) can begin.

Consultation positions

1. National oversight — Strongly support. Strategic water infrastructure has long lead times, cross-company dependencies and material environmental and customer consequences. National oversight can improve sequencing, consistency and resolution of regulatory conflicts, but should not displace accountable regional planning or company delivery.

2. Enhanced option development — Yes, with limits. RAPID can identify gaps and facilitate options where national or cross-regional resilience is at stake. It should not generate projects independently of transparent systems planning, need assessment and public-interest appraisal.

3. Expanded entry criteria — Strongly support a risk-based test. Entry should be triggered where at least several of the following apply: multi-party or cross-boundary delivery; material regulatory conflict; high environmental sensitivity; long time horizons across control periods; novel technology or delivery models; system-critical resilience; major cumulative customer exposure; or a need for phased development funding.

4. Timing — Pilot as a priority; scale over the longer term. A small transition portfolio should test wastewater and other strategic-project oversight before institutional transfer to the new regulator. Expansion must be matched by specialist wastewater, catchment, planning, commercial and programme-delivery capability.

5. Wastewater and other projects — Include selectively. Definite candidates include strategic wastewater treatment or transfer projects, city-wide drainage and storm-overflow programmes, major water reuse, bioresources / sludge systems, interconnectors, drought-resilience schemes and projects with nationally significant industrial or housing demand. Ordinary site-specific WINEP schemes should normally remain outside RAPID.

6. Avoiding duplication — One plan, one evidence base, aligned gates. RAPID should agree a common data room, evidence standard and integrated assurance plan with planning, environmental, economic and drinking-water regulators. Submissions should be re-used and updated rather than recreated.

Key safeguards and improvements to the proposed approach

- **Keep roles distinct.** Government and the future single regulator should set national outcomes and policy trade-offs; systems planners should identify and compare portfolios. RAPID should coordinate regulators, assure development and escalate barriers; water companies and delivery bodies should remain accountable for execution.
- **Use proportionate, adaptive gates.** Evidence requirements should match project maturity. Each gate should test continuing need, alternatives, benefits, affordability,

deliverability and environmental acceptability, with explicit stop, pause, revise or proceed decisions.

- **Strengthen early challenge rather than accelerate weak projects.** Early acceleration is valuable only after a credible problem definition and options process. National Audit Office evidence repeatedly identifies weaknesses in scope, planning, interdependencies and oversight as causes of major-programme failure.
- **Embed whole-system and catchment appraisal.** RAPID should require comparison of supply, demand, leakage, reuse, network, catchment, SuDS and nature-based measures, including cumulative impacts and distributional consequences. Strategic wastewater oversight should involve local authorities, highways and catchment partnerships where their actions materially affect outcomes.
- **Make benefits and uncertainty visible.** Gate decisions should report ranges for cost and schedule, optimism bias, dependencies, residual risk, adaptive pathways and quantified customer / environmental benefits. Reference-class evidence should be used where sufficient comparable projects exist.
- **Clarify escalation and decision rights.** A regulator alliance can coordinate but may lack authority to resolve contested trade-offs. The final model should state who decides, who can direct remedial action, who owns each risk and how unresolved disputes reach ministers or the future regulator.
- **Protect transparency and public legitimacy.** Publish non-commercial gate conclusions, reasons for project entry and exit, changes in cost / scope, environmental trade-offs and delivery performance. Meaningful local and environmental engagement should begin before preferred solutions harden.
- **Resource the function properly.** Expansion without skilled people would slow rather than accelerate delivery. RAPID needs programme, engineering, wastewater, ecology, planning, commercial, financing and data capability, with access to independent technical review.

Concise response to the consultation questions

Q1: Strongly support national oversight, subject to clear accountability and no duplication.

Q2: Benefits: coordination, sequencing, consistent evidence and earlier resolution. Limitations: centralisation, delay, mission creep and weakened regional ownership.

Q3: Use a formal national–regional governance forum, transparent criteria, stakeholder panels and published trade-off decisions.

Q4: Yes, where RAPID identifies system gaps and facilitates—rather than predetermines—options.

Q5: Priority order: early challenge / escalation; troubleshooting and shared learning; wider catchment engagement; stronger information flows; government backing.

Q6: Use common resilience / environmental metrics, adaptive pathways and an independently assured national portfolio assessment.

Q7: Strongly support expanded, risk-based entry criteria.

Q8: Pilot priority projects now; undertake full expansion under the new regulator.

Q9: Highest importance: national / regional significance; cross-regulator alignment; multi-party complexity; policy trade-offs; cross-AMP duration; phased/in-period funding.

Q10: Definitely include major transfers / interconnectors, reuse, strategic resilience and nationally significant wastewater; probably include strategic treatment, city-scale drainage and bioresources.

Q11: RAPID adds value through integrated regulation, common assurance, early issue resolution, portfolio sequencing and shared specialist capability.

Q12: Align gates with statutory processes, use one evidence base, define decision rights, publish a responsibility matrix and apply proportionality.

Conclusions

The WCWC welcomes the proposed direction. It advocates disciplined expansion rather than enlargement for its own sake. RAPID's comparative advantage is its ability to assemble regulators around difficult, long-term and cross-boundary problems. Its success should be judged by whether better projects reach consent and delivery sooner, with lower whole-life risk, clearer accountability and demonstrably improved outcomes for customers, communities and the environment—not by the number of projects admitted to its programme.

The Worshipful Company of Water Conservators

The Worshipful Company of Water Conservators (WCWC) is a City of London Livery Company focussed on the long-term health of our water resources and the broader environment. Our members include senior professionals from water, environmental and related industries and regulators, along with others who share our concern for water and the environment. Our experience and knowledge ranges from the complexities of environmental sciences, through the application of engineering to deliver the goals identified by those sciences, and the subsequent management of the assets created. The WCWC's purpose is *promoting a diverse and sustainable environment*.

Appendix

RAPID, from a Sustainable Urban Drainage Systems (SuDS) perspective

Standardise the details

Standard details work where the asset is buried, repeatable and in controlled ground. A concrete tank or a pipe run is exactly that, and templating it is right. Retrofit surface water is not that. The variables are in the site, not in the asset.

Any expanded remit must be explicit that standardisation applies to components, details and processes, and not to design solutions. A framework built on replication will produce standard details applied to non-standard streets, and they will fail on site or in performance.

Maintenance is not an obstacle

Maintenance is the standing objection to SuDS at scale. The whole life cost is assumed to be higher and the adoption liability uncertain. However, in reality conventional drainage is only cheap to maintain if it is maintained. Across much of the UK, it is not. A neglected gully silts, blocks and stops, and when it stops the road floods. The failure is sudden and total.

SuDS behaves differently under neglect. Six years of continuous flow and rainfall monitoring on a city centre raingarden whose local authority owner has never maintained it, found the site continued to work. The same holds for permeable paving. The right test for a national framework is not which asset needs the most attention. It is which asset behaves best when the attention does not arrive, because on current local authority budgets it will not arrive. On that test, SuDS is more resilient than the pipe and gully network it supplements.

Monitoring

SuDS adoption is throttled by thin real-world data. Standardised post-construction monitoring should with the data pooled and published should be part of any national scheme.

Delivery

Expanded entry criteria should therefore be agnostic to supplier scale and should protect direct access to specialist capability rather than defaulting to established framework routes.

SuDS and RAPID

If there is one thing an expanded RAPID could do that nobody else can, it is this. The prize is not building grey wastewater assets faster. It is using surface water source

control to avoid or defer grey capital altogether: smaller storm tanks, deferred sewer upgrades, fewer storm overflow schemes.

Green approaches sit across the boundary between the water company, the highway authority, the lead local flood authority and the developer. No single party can appraise it, fund it or own it alone. Spanning exactly that boundary is what RAPID exists to do. That is the specific value RAPID would add on surface water: cross-boundary option appraisal and funding sequencing at programme level.

Avoid duplication

Surface water already sits inside a dense regulatory framework: the NPPF, Defra's National Standards for SuDS, mandatory biodiversity net gain, statutory drainage and wastewater management plans, lead local flood authority approval and the planning system. A national RAPID layer risks duplicating all of it.

RAPID's role on surface water should be cross-boundary option appraisal and funding sequencing at programme level, and explicitly not a further consent or assurance gate stacked on top of the machinery that already exists. One clear job, not another approval stage.