

The Rivers Trust response: Consultation on the future of RAPID

RAPID's role alongside systems planning

The water sector is moving towards a new planning framework, with stronger national and regional coordination. RAPID already helps align regional plans with project-level delivery. These questions ask how RAPID's national oversight role should work alongside future water system planning, including how it can support coherence, manage cross-boundary issues and involve water companies, regional groups and other stakeholders in setting direction.

4. To what extent do you support or oppose national oversight of the programme of strategic infrastructure projects from conception to delivery?

Select **one option** from the following:

-Strongly support

-somewhat support

-Neither support or oppose

-Somewhat oppose

-Strongly oppose.

Please briefly explain your answer below.

The Rivers Trust supports national oversight of strategically significant water infrastructure where it helps ensure coherent planning, regulatory alignment, environmental protection and timely delivery. A national perspective is particularly valuable for projects with cross-boundary impacts, inter-regional transfers and wider implications for water resilience.

However, national oversight should not focus solely on accelerating infrastructure delivery. It should also help ensure that infrastructure choices align with wider environmental objectives, including river restoration, climate resilience, biodiversity recovery and sustainable water management. National oversight should promote integrated water system planning that considers public water supply, agriculture, industry, energy and environmental water requirements together and help screen out proposals that are not suitable at an early stage.

5. What benefits and/or limitations, if any, do you consider national oversight brings to the development of strategic water resource infrastructure?

Please provide evidence or examples where possible.

National oversight can:

- Improve coordination between regional water resource plans and individual projects.
- Identify opportunities and dependencies that span cross company and regional boundaries.
- Provide a consistent framework for regulatory scrutiny and decision making.
- Improve transparency regarding national water resource needs and priorities.
- Support earlier identification and resolution of delivery risks.

National oversight can also help ensure that environmental considerations are addressed consistently and early in project development, reducing the risk of delays later in the planning and consenting process. As above, it could (if the regulatory framework is improved) also provide opportunities to look for outcomes that deliver multiple benefits.

A risk is that national decision making becomes detached from local environmental conditions/requirements and stakeholder concerns. This can be mitigated by ensuring strong regional and catchment-level multi-sector input and meaningful engagement with local communities, environmental organisations and catchment partnerships throughout the process.

A key limitation is that this is dealing only with the supply side of water resources challenges.

6. How should water companies, regional groups and other relevant stakeholder groups be involved in setting the national direction for the programme?

Please set out the principles, barriers, limitations or governance arrangements you believe should apply.

National priorities should be developed collaboratively through a structured governance framework involving a range of sectors and organisations including:

- Water companies.
- Regional water resources groups and regional systems planners.
- Environmental regulators.
- Environmental NGOs.
- Catchment Partnerships.
- Agriculture, energy and industrial water users.
- Consumer representatives.

Local and regional knowledge should inform national decisions from the outset. Catchment Partnerships and environmental organisations can provide critical insight into ecological risks, restoration opportunities and wider catchment outcomes that may not be evident through national modelling alone and/or a very narrow focus on achieving water resources outcomes alone.

The Rivers Trust believes RAPID should actively support integrated water system planning, nature recovery and environmental resilience by enabling shared solutions across sectors and maximising public value from infrastructure investment.

However, there is of course significant uncertainty about the role of RAPID with the advent of the new integrated water regulator and so further discussions are required to ensure that RAPID can add value to whatever arrangements are put in place.

In terms of governance structures, catchment partnerships, regional system planning groups, regional water resources groups and the national framework for water resources groups should all play a key role in aligning national priorities to regional and catchment level ones.

Accelerating delivery of major water infrastructure

Major water infrastructure projects are complex and often need input from several regulators before they enter formal planning, environmental consent and procurement processes. RAPID currently provides assurance, challenge and coordination through its gated process. These questions ask how RAPID could grow a bigger and more diverse pipeline of projects, better support early project development and improve decision making across the programme to support delivery.

7. Should RAPID have an enhanced role to identify and facilitate additional resource development options for further consideration by regional water system planners and water companies?

Select:

-Yes

-Maybe

-No

Please briefly explain your reasons and any perceived gaps below.

RAPID is well placed to identify opportunities that may fall outside existing planning processes, particularly when potential benefits cross administrative, regulatory or regional boundaries.

This enhanced role should include consideration of:

- Multi-sector water storage opportunities.
- Strategic water sharing arrangements.
- Nature-based solutions.
- Catchment-scale water retention measures.
- Water recycling and reuse schemes.
- Regional resilience projects that combine environmental and water resource benefits.

The Rivers Trust would encourage RAPID to consider the role of nature-based alongside engineered solutions within future strategic assessments, recognising the particular role that NBS can play in delivering long term resilience.

8. What more can RAPID do to assure major projects during early development to help reduce delivery risks and enable robust applications to statutory authorities for planning and environmental consent?

On a scale of 1-10, please rate the following options in order of importance (1 = most important, 10 = least important)

e) Strengthen challenge and escalation to resolve important issues earlier.

Scale rating number: 2

e) Troubleshoot common problems, share learning and best practice.

Scale rating number: 2

e) Increase the frequency, transparency and/or quality of information flows.

Scale rating number: 2

e) Engage with wider catchment demands across sectors.

Scale rating number: 1

e) Secure government backing to support programme delivery.

Scale rating number: 3

Please provide any further comments below

Strengthening engagement with wider catchment demands and environmental considerations at the earliest stages represents a significant benefit.

Many project risks emerge because environmental constraints, catchment pressures and competing water demands are identified too late in scheme development. RAPID should encourage earlier catchment assessment, collective problem solving and greater use of catchment-based evidence to help shape scheme assessment, design and delivery to ensure the greatest outcomes are achieved.

RAPID could also play a stronger role in sharing lessons learned across projects, particularly regarding environmental mitigation, stakeholder engagement and innovative approaches that achieve both resilience and ecological outcomes.

9. In what ways, if any, should RAPID do more to help determine national priorities, trade-offs and sequencing across the programme?

Please set out the principles or arrangements you believe should apply.

RAPID should help establish transparent frameworks for evaluating trade-offs between:

- Water supply resilience.
- Environmental outcomes.
- Affordability.
- Carbon emissions.
- Climate resilience.
- Social value.

National prioritisation should recognise that protecting and restoring healthy rivers is not separate from water security; it is fundamental to long-term resilience.

Sequencing decisions should take account of:

- Environmental urgency.
- Regional water stress.
- Project dependencies.
- Deliverability risks.
- Opportunities to secure multiple benefits from a single intervention.

Future entry criteria into the RAPID programme

Projects currently enter the RAPID programme mainly because of their scale and complexity. The Independent Water Commission recommended that RAPID's remit should be expanded to include projects that may not meet current thresholds but would still benefit from coordinated regulatory oversight. These questions ask whether the entry criteria should change, when any change should happen, and what factors should matter most when deciding whether a project enters the programme.

10. To what extent do you support or oppose the expansion of entry criteria for projects entering the RAPID programme?

Select one option from the following:

-Strongly support

-Somewhat support

-Neither support or oppose

-Somewhat oppose

-Strongly oppose.

Please briefly explain your answer setting out your preferences and any reservations below.

The Rivers Trust supports expanding entry criteria where coordinated regulatory

oversight would improve outcomes, reduce risks or address strategic challenges that cannot be effectively resolved by individual organisations acting alone.

The focus should be on strategic importance and complexity rather than simply the size or cost of a project.

11. If the entry criteria are expanded, should this happen as a priority during the transition period or in the longer term as infrastructure challenges evolve under a new single regulator?

Select **one option** from the following:

-As a priority

-Over longer term.

Please briefly explain your answer.

Given increasing pressures from climate change, population growth, environmental decline and water scarcity, there is a need to plan better and faster. As previously mentioned, much of this may be achieved through ongoing water policy reform and be part of the remit for the new water regulator, however, there could be merit in broadening RAPID's remit during the transition period so that lessons can be learned sooner to help inform a future integrated regulatory framework is fully established.

Any expansion should however be phased and proportionate to ensure that existing programmes continue to be delivered effectively and that there is the capacity and expertise within RAPID to deliver more.

12. How important are the following criteria in deciding whether a project should enter the RAPID programme?

On a scale of 1-10, please rate the following criteria in order of importance and provide any further comments below (1 = most important, 10 = least important).

a. The project involves significant multi-party complexity;

Scale rating number: 1

- b. The project would benefit from early cross-regulator alignment;

Scale rating number: 2

- c. The project involves conflicting policy drivers or trade-offs that require regulatory input;

Scale rating number: 2

- d. The project spans more than one cost control and asset management period;

Scale rating number: 3

- e. The project may require ring-fenced, phased development funding

Scale rating number: 4

- f. The project may require in-period adjustment to development funding to support long-term planning;

Scale rating number: 4

- g. The project is nationally or regionally significant for resilience, the environment or customers.

Scale rating number: 1

Please provide any further comments below

Particular weight should be given to projects that deliver significant environmental and resilience benefits or involve complex trade-offs between competing objectives. Early national oversight can help resolve these issues before substantial resources are committed.

Scope and remit: wastewater and other strategic water infrastructure

RAPID currently oversees major water supply infrastructure. The Government has asked RAPID to consult on whether its role should extend to some wastewater and other strategically important water infrastructure projects. These questions ask what types of projects, if any, should be brought within scope, what value RAPID could add, and how any extension should avoid duplicating existing regulatory, planning or funding processes.

13. What types of wastewater and other strategically important projects should be included within RAPID's national oversight remit?

Please select **one option** for each project type in the below table:

Project type	Definitely include	Probably include	Neutral	Probably exclude	Definitely exclude	Don't know
Strategic wastewater treatment projects	☒	☐	☐	☐	☐	☐
Large-scale wastewater transfer schemes	☒	☐	☐	☐	☐	☐
Water recycling and reuse schemes	☒	☐	☐	☐	☐	☐
Desalination schemes	☐	☒	☐	☐	☐	☐
Major interconnectors or transfer schemes	☒	☐	☐	☐	☐	☐
Strategic resilience schemes, including drought resilience	☒	☐	☐	☐	☐	☐
Other nationally or regionally significant water infrastructure	☒	☐	☐	☐	☐	☐

Please explain your answer and/or use the space below to suggest other types of project that should be included or excluded.

Nature-based and catchment-scale interventions should also be considered where they deliver nationally or regionally significant benefits for water resources, resilience or environmental outcomes – this should include the delivery of multiple and catchment wide solutions that cumulatively could achieve or contribute to the desired outcomes whilst also providing lasting catchment resilience.

RAPID oversight should also be contingent on schemes meeting a particular threshold to ensure that there is added value of oversight.

14. Reflecting on how you've responded above, what value, specifically, do you believe RAPID could add if its remit was extended to cover the wastewater and other strategically important projects you think should be included?

An expanded RAPID could provide:

- Earlier regulatory alignment.
- Stronger cross-sector coordination.
- Consistent environmental scrutiny.
- Improved sharing of best practice.
- Better integration of infrastructure planning with catchment and environmental objectives.

This would help ensure that strategic investments support both water security and environmental recovery & resilience.

15. Finally, how should any extension to RAPID's national role be designed to avoid duplication with existing regulatory, planning or funding processes and avoid unintended consequences?

Clear responsibilities, transparent decision-making and effective collaboration with existing governance structures will be essential.

Where existing regional planning bodies, Catchment Partnerships or environmental programmes already provide robust evidence and stakeholder engagement, RAPID should utilise and build upon this rather than creating parallel processes.

In addition, and as previously highlighted, there remains uncertainty over the timing, scope and scale of the new integrated water regulator, and RAPID's role in this and this requires further discussion/scrutiny to ensure that the most appropriate structures, roles and ways of working are established.

16. If you have any further comments, evidence or alternative proposals on RAPID's future role, remit, governance or implementation that have not been covered in your responses to the questions above, please share them below.

The Rivers Trust believes that future water infrastructure planning should move beyond a traditional distinction between engineered and nature-based solutions. Both should be considered consistently within a single strategic framework focused on delivering sustainable water security, river health and climate resilience.

An expanded RAPID could provide some opportunities to embed integrated catchment management, environmental recovery and multi-sector water planning more fully within both national and regional level strategic decision making. However, the exact role during and after the transition period for a new water regulator and regional system planning needs to be considered carefully to ensure we achieve the most effective approach.