



RTPI

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To whom it may concern,

Response to the consultation on a Water Resources NPS.

The Royal Town Planning Institute (RTPI) welcomes the opportunity to provide evidence to Defra's consultation on developing a National Policy Statement for Water Resources and proposals to amend the definition of nationally significant water infrastructure in the Planning Act 2008.

The RTPI has over 25,000 members who work in the public, private, voluntary and education sectors. It is a charity whose purpose is to develop the art and science of town planning for the benefit of the public. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, practice advice, training and development.

Please see our submission to the consultation below.

Yours faithfully,

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The RTPI is broadly supportive of this draft NPS, and believes that it can be strengthened by focusing on the following key issues:

- While supporting the twin-track approach, placing greater emphasis on demand management and leakage reduction
- Providing a wider contextual setting, with water surplus and flooding considered alongside drought, demonstrated with a series of maps
- Recognising environmental drivers as fundamental considerations to successful water resource management
- Ensuring that local authorities and community engagement plays an important role, as not all infrastructure should be regarded as nationally important

1. Do you have any views or further evidence that could inform the need for resilience in the water sector?

The context of this NPS is to strike a balance between streamlining and speeding up the planning process for NSIPs, retaining local planning authorities (LPAs) as the most appropriate route for decision-making on the majority of water resources infrastructure schemes, and requiring effective local engagement and consultation in line with the Localism Act 2011.

The NPS should also be strengthened by setting out, with appropriate maps, the spatial context for water resources in England. This is because in places like the North and West of England, spatial patterns of rainfall quantity and water supplies are usually more than sufficient. In London, the South East and East of England, there are much lower levels of rainfall and water supply. The challenge for water resource management in England is that the spatial patterns of water resource contrast sharply with current distributions and future projections of population and economic growth. There is a serious lack of long-term, joined-up thinking across government departments on the extent to which growth can be made sustainable in those parts of the country most at risk of water stress and drought.

The RTPI first drew attention to this issue in our 2012 study 'A Map for England' which examined the interaction of different aspects of government policy on different parts of the country, and found that areas with the highest household growth projections were those most at risk of water stress¹. This recent DCLG consultation 'Planning for the right homes in the right places' risks exacerbating this problem by proposing a simplified methodology for calculating housing need which bases future growth projections on past trends. However, the potential unintended consequences on water sustainability and infrastructure cost are not considered – the expectation seems to be that water demand should simply be met where it arises. The wording of the NPS (e.g. paragraph 37) seems reinforce this perception. A much greater degree of joint working is required between Defra, DCLG and other government departments to address the critical question of how environmental capacity should influence the distribution and location of growth at the national level.

Furthermore, with a surplus in the North/West and a deficit in the South/East, it seems clear that water transfer and re-distribution will be a significant issue both now and in the future. Although the NPS applies to England, it is critical that this is developed in consultation with

¹RTPI, 2012. *A Map for England*. www.rtpi.org.uk/media/11202/map_for_england_final_report_2012.pdf

the Welsh and Scottish governments in order to address future cross-boundary issues. Following Brexit this should fall under the purview of what we consider to be the required Common Environment Framework among the UK Nations. The RTPI has given evidence to the Public Administration and Constitutional Committee on this subject².

We support the inclusion of the Climate Change Risk Assessment (CCRA2) as one of the drivers of need for water resilience, along with the links between water resources and population/economic growth. To this we would seek to add a greater understanding of how changing lifestyles are driving a growing demand for water, for example through the use of more water-intensive domestic appliances.

Climate change is a key driver of the need for water resilience. This should not just be viewed from the perspective of increasing summer temperatures and drought, but also in terms of the increasingly wet winter conditions that many parts of the country are now experiencing, and the impact of local flooding in previously low-risk areas. Here, excess water is often being wasted through drainage to watercourses and the sea, rather becoming part of a useful transfer scheme at an early stage.

Environmental protection is supported as a key driver, linked to the government's commitment to 'leave the environment in a better state than it found it'. It is critical that proper mechanisms are in place to ensure accountability on this commitment.

2. Do you have any views or comments on these principles for developing the NPS?

We support the twin-track approach to water resilience, but recommend a greater emphasis on demand management and fixing leaks. This is a far more cost-effective and environmentally friendly approach than providing new large schemes. Defra should be however be aware that water demand management has become more challenging to pursue through the planning system due to the government's decision to cancel the Code for Sustainable Homes (CfSH). This allowed local planning authorities (LPAs) to set high standards for water efficiency in new developments, with CfSH Level 6 requiring new dwellings to consume a maximum of 80 litres/person/day. LPAs are now only able to set policies that require new dwellings to meet the optional requirement in Building Regulations of 110 litres/person/day, which must be backed up with evidence of a clear local need. There is limited evidence on the extent to which LPAs have adopted this more stretching target, although research has suggested that a variety of factors, including the emphasis on viability in the NPPF, has made it more difficult for LPAs to justify the inclusion of higher standards³. This issue will require cross-departmental engagement between Defra and DCLG.

Where new larger schemes are demonstrably required, a full assessment will be required to compare the impact of water transfer schemes with new dams and reservoirs.

Principle 3 needs to include the importance of local community engagement and consultation; the importance of social, economic and environmental appraisals, and the need for clear integration with other land management bodies and their policies and plans. We support the use of water resource management plans, along with the expectation that

² See: data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/public-administration-and-constitutional-affairs-committee/devolution-and-exiting-the-eu/written/74392.html

³ TCPA, 2016. *Planning for the Climate Challenge? Understanding the performance of English Local Plans*. www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7d92ec4c-09f7-4b21-9d22-b1aad77fd062

companies consider strategic regional and national needs as well as local needs, and work together in a joined up way.

Defra should note that the move towards a localised planning system in England has made it more challenging to carry out strategic planning, for example in identifying strategic locations for housing and economic growth and coordinating this with regional analyses of infrastructure surplus/deficit and future investment plans. The RTPI has frequently campaigned for better mechanisms to support strategic planning, which link policy areas for housing, employment, transport, energy, water, waste and digital infrastructure⁴. Many of the devolution deals emerging across England now provide groups of local authorities with the ability to develop strategic plans which should better align growth with infrastructure provision.

3. Do the AoS objectives and guide questions (Section 4.3 of scoping report) cover the breadth of issues appropriate for appraising the effects of the draft NPS?

The Appraisal of Sustainability (AoS) and Strategic Environmental Assessment (SEA) are supported. It is essential that the specific contributions of both are strongly demonstrated in the final NPS.

4. What are your views on the factors we have set out here for considering if schemes are nationally significant?

We support the recognition in paragraph 58 that local planning authorities will remain the most appropriate route for the majority of water resources infrastructure schemes, which will mean strong local community input.

This response does not cover all of the consultation questions. To view the full consultation document [click here](#).

⁴ RTPI, 2015. Strategic Planning: Effective Cooperation for Planning Across Boundaries. www.rtpi.org.uk/knowledge/policy/policy-papers/strategic-planning