

Maximising planning for water

Engagement, survey approach and detailed summary of responses



Context

This report is comprised of a summary of the survey responses.

This summary was prepared by Eunomia in January 2024.

Survey aims and objectives

The survey aimed to find out how Local Planning Authorities in the Oxford to Cambridge area are working to improve the water system, including its water resources, quality, environment, and flood risk. We were keen to collect data on

- the significance of water related challenges
- challenges to the implementation of water related policy
- stakeholders engaged when developing policy and when making planning decisions
- factors that both support and constrain the ability to adequately consider water when both developing plans and making planning decisions
- guidance documents used to develop and implement water related planning policy
- examples of policies that are deemed to be both resulting in positive outcomes and negative outcomes for water ambitions

Most of the data is quantitative, however for some questions respondents were invited to provide

further explanatory details to their answers in open text. Respondents were asked different questions based on whether they mainly worked on policy drafting and production, or in policy implementation and application.

Invitations were sent to over 140 targeted individuals form all 18 LPAs in the Oxford to Cambridge geography, and 33 individuals (29 responses from 13 LPAs and 4 responses from others including Mineral Planning Authorities) responded to the survey. This means that the participant response rate was 23%. Of the 33 respondents, 24 were involved in policy drafting/production, and 9 were involved in policy implementation and application. Respondents included planning policy officers, planning officers, planning managers, and flood and water managers.

24 involved in policy drafting/production

Nine involved in policy implementation and application



Survey approach

The surveys for both strands (i.e. planning policy drafting/production and planning policy implementation and application) were drafted by Eunomia with support from the Environment Agency and LUC. It was set up in 'Smart Survey' and disseminated by the Environment Agency. The survey was sent to all Local Planning Authorities in the Oxford Cambridge geography and was targeted to specific individuals. It was also shared with County Councils.

The participants involved in policy drafting and implementation were asked a total of10 questions. 5 of these questions were the same for both groups, while the remaining questions were slightly different, focusing specifically on either the plan making or planning implementation process.

Summary of survey responses

The below sections summarise answers from the 33 respondents from 13 Local Planning Authorities, across the Oxford Cambridge geography, split into those who answered with regards to policy drafting (24 respondents), and policy implementation (9 respondents). As noted above, some questions that were identical or which

differed only in their wording in terms of relevance to policy drafting or implementation were asked to both types of respondents. For these questions, we have drawn out notable comparisons between how the 2 types of respondents answered the relevant mirrored question.

Planning policy drafting

1. In your role, how often do you consider water-related challenges in relation to strategic and spatial planning policies?

There were 24 responses to this question in total. Flooding and water availability were the water-related challenges that respondents most frequently stated were always considered when developing policy. However, each water-related challenge was also said to be considered at least 'often' by more than half of respondents.

Full results are shown in Figure 1. Flooding was also said to be the water-related challenge that was most frequently considered all of the time by those involved in policy implementation (see Figure 7), whilst the remaining water-related challenges appeared to be considered with relatively comparable levels of frequency between the 2 types of respondents.

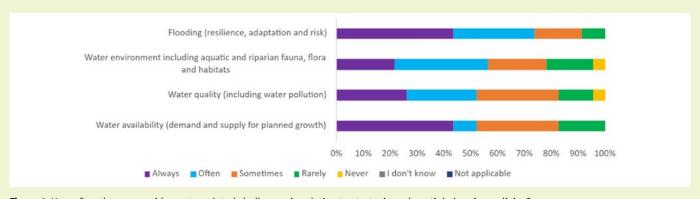


Figure 1: How often do you consider water-related challenges in relation to strategic and spatial planning policies?

2. In comparison with other policy drivers (e.g. housing, transportation, climate change, biodiversity, public health, economic development, etc.), how significant are your authority's water-related challenges?

There were 24 responses to this question (results shown in Figure 2). Six respondents said water-related challenges were 'very significant' compared to other policy drivers, 5 said they were 'significant' and 9 said

they were 'moderately significant'. Compared to those respondents involved in policy drafting, respondents involved in policy implementation reported that water related challenges were 'very significant'.

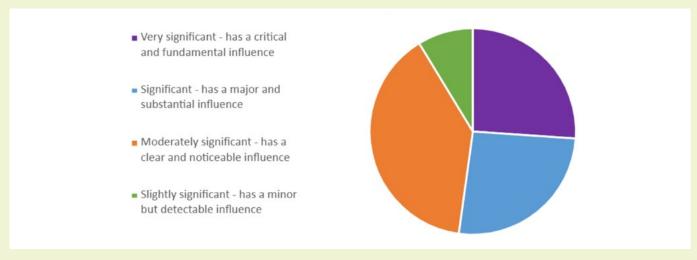


Figure 2: In comparison with other policy drivers how significant are your authority's water-related challenges?

3. When developing a local plan, how often, if at all, do you engage with stakeholders or use the following guidance, regulations and advice to consider water?

There were 23 responses to this question. The results, (see Figure 3), show that relevant national planning policy and guidance is the most frequently used resource by respondents, with 19 stating that they 'always' engaged with it when developing a local plan. Engagement with various Water and Sewerage Companies (WaSCs), local water management organisations like Lead Local Flood Authorities (LLFAs) and Internal Drainage Boards (IDBs), the Environment Agency (EA), and Regional Flood and

Coastal Committees (RFCCs) are also used regulalrly. In the open text section, respondents gave examples of other stakeholders they engage with including The Parks Trust, parish councils and local resident groups, Historic England, and the National Grid. The major difference with those involved in policy implementation, when they are considering a specific planning application (see Figure 10), was that they used personal judgement and experience more frequently than those involved in policy drafting.

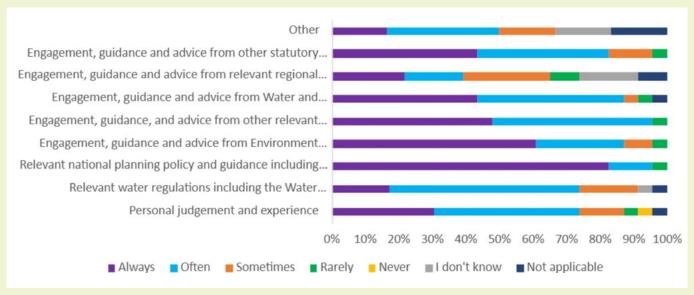


Figure 3: How often do you engage with the following stakeholders/guidance/regulations around water when developing a local plan?

4. To what extent do you agree or disagree with the following statement: When developing planning policies, my local planning authority takes steps to engage early with stakeholders; takes steps to build/maintain partnerships including cross-border liaison; has good management principles to achieve the vision.

There were 23 responses to this question. The results (see Figure 4) show that most respondents think they have good management principles, take

steps to build partnerships, and engage early with relevant stakeholders.

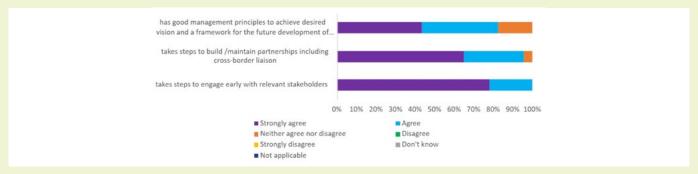


Figure 4: To what extent do you agree with the following statement: When developing planning policy, my local planning authority...

5. To what extent, if at all, have the following factors (e.g. LPA staff understanding of water management; National policy requirements; alignment of wate policy with other Local Plan objectives) supported or constrained your Local Planning Authority's ability to adequately consider water in developing local planning policies? Please explain the reasoning behind some of your answers.

There were 20 responses to this question in total (see results in Figure 5). Some respondents stated that they did not know how to answer the question (between 2 to 8 respondents depending on the factor in question). There appeared to be a range of opinion across the different factors for the extent to which they influence the ability to consider water in developing planning policy, and many of the factors were considered both supporting and constraining, with different respondents having alternate views. The most strongly supporting factors appeared to be engaging with the Environment Agency, water companies and other statutory consultees for advice, as well as national policy and regulatory requirements for planning. Availability of resources (human/financial) was the factor most cited as strongly constraining. Availability,

accessibility and quality of relevant evidence and data was seen as slightly constraining by almost half of respondents, whilst skills of local authority officers related to water was also commonly seen to be a slightly constraining factor. There did not appear to be a strong contrast in the responses between those involved in policy drafting and implementation (see Figure 11 for policy implementation results), although Engagement with the Environment Agency, water companies and other statutory consultees was seen as more supportive by those in policy drafting. The State of the local plan was seen as the most important supporting factor by those in policy implementation, but this was not a factor available for consideration for those in policy drafting.

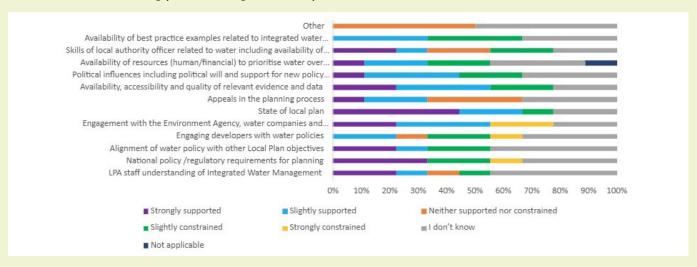


Figure 5: To what extent have the following factors supported or constrained your Local Planning Authority's ability to adequately consider water in developing local planning policies?

6. Where would you invest more resources, if you had them available, to provide best return on investment by improving the water environment?

There were 20 responses to this question. The results show (see Figure 6), that respondents would priroitise investment into improving water availability (demand and supply for planned growth) most, because it would provide the best return on investment. Flooding (resilience, adaptation and risk) and water quality (including water pollution) were also deemed important (4 respondents each). One respondent thought that

the water environment including aquatic and riparian fauna, flora and habitats should be prioritised for investment. By comparison, those involved in planning implementation most commonly thought that investment into flooding would provide the best return on investment, and none said that they would prioritise investment into water quality (see Figure 12).

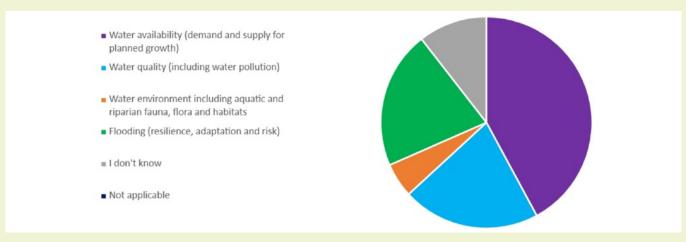


Figure 6: Where would you invest more resoources, if you had them available, to provide best return on investment improving the water environment?

7. In addition to the National Planning Policy Framework and Planning Practice Guidance, are you aware of any further available guidance that could be used as a reference point (when considering water) in developing policy?

There were 12 responses to this question from LPAs from across the Oxford to Cambridge geography, including all 3 partner LPAs. The types of guidance resources referenced included:

- Association of Directors of Environment, Economy, Planning and Transport (ADEPT) – Strategic Flood Risk Assessments (mentioned multiple times)
- Construction, Industry, Research and Information Association (CIRIA) - Delivering better Water Management through the Planning System (mentioned multiple times)
- Integrated Drainage East Anglia (IDEA) Water management checklist for Local Plan policies
- Meeting our Future Water Needs: a National Framework for Water Resources
- Strategic Flood Risk Assessment (SFRA) guidance

- Water company water management plans/guidance
- River Basin Management Plans
- Water Royal Institute of British Architects (RIBA), Town and Country Planning Association (TCPA), Royal Town Planning Institute (RTPI) publications
- Environment Agency webinars
- Sustainable Drainage Systems (SuDS) Manual
- Water neutrality studies
- Water cycle studies
- Supplementary planning documents
- Local flood risk management studies
- Local Catchment Partnerships

8. Please provide details of any good examples of planning policies (past, current, or emerging) in your LPA that have or are expected to result in positive outcomes for water or contribute to your LPA's water ambitions.

There were 18 responses to this question from LPAs from across the Oxford to Cambridge geography, including all 3 partner LPAs. Examples of good planning policies that have or are expected to result in positive outcomes for water or contribute to LPAs water ambitions include:

- Various references to different policies in individual Council's Local Plans, including those relevant to flood risk, wastewater management, surface water, and water related development
- Cambridge Suds Design and Adoption Guidance
- Cambridge Flood and Water SPD
- The North Northants Joint Core Strategy (collaboration between Council, EA and Anglian Water)
- The Oxfordshire Minerals and Waste Core Strategy
- The North Northants Joint Core Strategy
- Salt Cross Area Action Plan (West Oxfordshire)

9. Please provide details of any planning policies (past, current or emerging) in your LPA that may lead to negative outcomes for water or conflict with your LPA's water ambitions.

There were 9 responses to this question from LPAs from across the Oxford to Cambridge geography, including all three partner LPAs. Most answers concerned reasoning as to why policies may be leading to negative outcomes or conflicting with water ambitions, as opposed to specific policies themselves. This reasoning included:

- Out of date local plan policies
- Barriers to adopting water efficiency standards

because of misalignment with planning inspector and application of building regulation standards

- Local Plan policies not going far enough with regards to water efficiency
- Policies not being reflected in planning decisions
- The need to balance environmental outcomes with development needs

10. Please provide details of any water related planning policies (past or current) in your LPA that failed or are failing to achieve the intended positive outcomes.

There were 10 responses to this question from LPAs from across the Oxford to Cambridge geography, including all 3 partner LPAs. Most answers concerned reasoning as to why policies may be failing to achieve intended outcomes, as opposed to specific policies themselves. This reasoning included:

- Weak compliance due to low enforcement capacity
- Difficulties in monitoring water efficiency, SuDS, water management schemes, in developments over time

- Failure of statutory bodies to steward the Local Plan process
- Building Regulations not stringent enough
- Local plan policy not stringent enough
- Lack of sub-regional spatial policy for crossborder collaboration
- Conflicting policies in the Local Plan regarding multifunctional spaces e.g. SuDS and playgrounds [Milton Keynes City Council]

Planning policy implementation

1. In your role, how often do you consider water related challenges when making planning decisions?

There were 9 responses to this question (see Figure 7). 7 respondents said that they 'always' consider flooding when making planning decisions. There was a range of opinion regarding the consideration of other water challenges. 4 respondents thought that they at least 'often' considered water quality and water availability,

whilst 5 respondents said that they considered the water environment at least 'often'. Flooding was also said to be most frequently considered water-related challenge by those involved in policy drafting (see Figure 1).

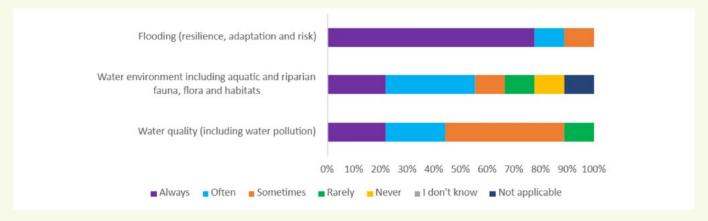


Figure 7: How often do you consider water-related challenges when making planning decisons?

2. In your opinion, how challenging is the implementation of water related policies?

There were 9 responses to this question (Figure 8). The spread of levels of challenge to implement different water related policies (i.e. flooding, water environment, quality and quantity) was similar across all policies. Overall, respondents considered the implementation of all water policies (moderately to very) challenging.

Seven respondents answered that it is at least 'somewhat' challenging to implement water quality policies, while six respondents thought this was the case for flooding policies, 5 for water environment policies and four for water availability policies.

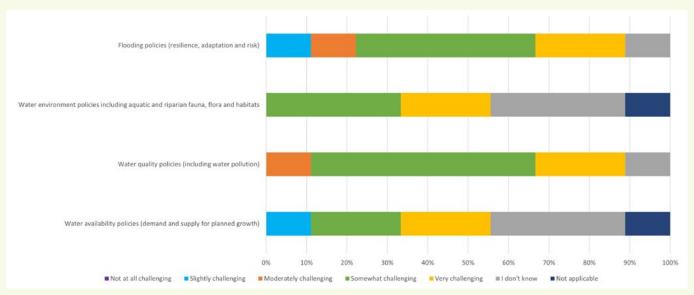


Figure 8: How challenging is the implementation of water related policies?

3. In comparison with other policy drivers (e.g. housing, transportation, climate change, biodiversity, public health, economic development, etc.), how significant are your authority's water related challenges?

A total of 9 respondents answered this question (see Figure 9). Four thought that their authority's water related challenges were 'very significant – have a critical and fundamental influence', 2 respondents answered that these were 'significant - have a major and substantial influence' and one thought these were

'moderately significant - have clear and noticeable influence' in comparison to other policy drivers. In comparison with those involved in policy drafting (see Figure 2), a higher proportion of those involved in policy implementation said that water related challenges were 'very significant'.

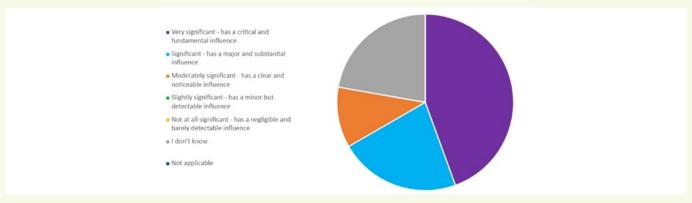


Figure 9: In comparison with other policy drivers, how significant are your authority's water related challenges?

4. When making planning decisions, how often, if at all, do you engage with stakeholders or use the following guidance, regulations and advice to consider water

There were 9 responses to this question. As shown in Figure 10, over half of the 9 respondents thought that they use personal judgement and experience, relevant national planning policy and guidance, and engagement, guidance, and advice from other relevant local water management organisations quite regularly. There was more variation in the use of remaining sources, including relevant water regulations and engagement, guidance, advice from: the Environment Agency, Water and Sewerage Companies, relevant regional water governance bodies and other statutory

consultees/government bodies. Two respondents cited additional resources they use that were not listed in the survey. These included seeking advice from in-house drainage engineers, whilst also emphasising that the consultees are highly variable and specific to the context of the planning project. The major difference with those involved in policy drafting (see Figure 3), was that those involved invovled in policy implementation stated that they use personal judgement and experience more frequently.

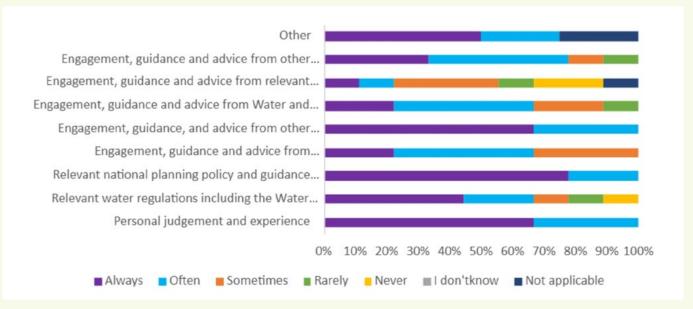


Figure 10: How often do you engage with stakeholders or use the following guidance, regulations and advice to consider water when making planning decisions?

5. To what extent, if at all, have the following factors supported or constrained your Local Planning Authority's ability to adequately consider water in making planning decisions? Please explain the reasoning behind some of your answers.

The answers of the 9 respondents to this question can be seen in Figure 11. Some respondents appeared unable to answer the question for the different factors. For those who felt able to answer, there were a range of opinions as to the extent to which different factors either constrained or supported the LPA's ability to consider water in planning decisions. The results show many of the factors were considered both supporting and constraining, with different respondents having alternate views on the factor in question. The State of the local plan was said to the most strongly supporting factor, however 2 respondents also saw it as a strongly constraining factor.

The plan making process; engagement with the Environment Agency, water companies and other statutory consultees; and engaging plan inspectors with water policies were more negative. There did not appear to be a strong contrast in the responses between those involved in policy drafting and implementation (see Figure 5 for policy drafting results), although engagement with the Environment Agency, water companies and other statutory consultees were seen as more supportive by those in policy drafting. The State of the Local Plan was not a factor available for consideration by those in policy drafting.

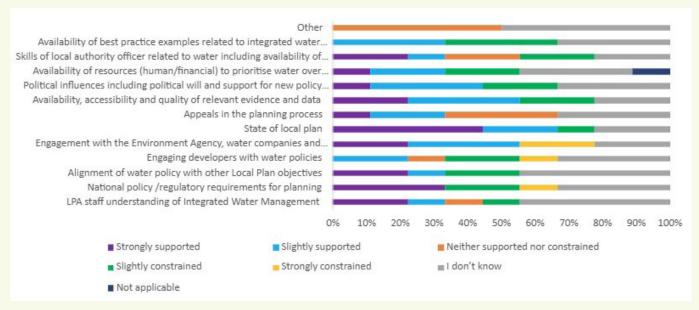


Figure 11: To what extent have the following factors supported or constrained your Local Planning Authority's ability to adequately consider water in making planning decisions?

6. Where would you invest more resources, if you had them available, to provide best return on investment by improving the water environment?

There were 9 responses to this question, the results of which are shown in Figure 12. Four identified flooding as the area they would invest more resources in to provide the best return on investment. The area identified as the second most important for investment was water availability (2 respondents) followed by water environment (1 respondent), whilst 2 respondents did not know which area would be best to invest in. No

respondents identified water quality as their chosen investment area. In comparison, water availability was considerably more favoured as a chosen investment area amongst those respondents involved in policy drafting, whilst water quality was also cited as a chosen investment area by a fifth of said participants.

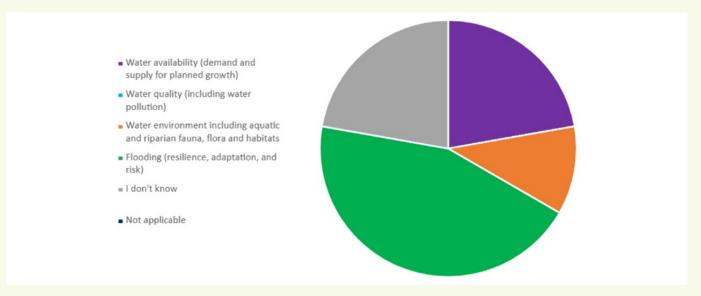


Figure 12: Where would you invest more resources to provide best return on investment by improving the water environment?

7. In addition to the National Planning Policy Framework and Planning Practice Guidance, are you aware of any further available guidance that could be used as a reference point (when considering water) in decision making?

There were 4 responses to this question from LPAs from across the Oxford to Cambridge geography, including Milton Keynes as a partner LPA. The types of guidance resources referenced included:

- Local plans
- Non statutory technical standards for sustainable drainage systems

- CIRIA SuDS Manual
- Design and Construction Guidance (DCG)
- Supplementary Planning Documents (SPDs)
- Flood and Water Management Act (FWMA)
- Advice from consultees

8. Please provide details of any good examples of planning policies (past, current, or emerging) in your LPA that have or are expected to result in positive outcomes for water or contribute to your LPA's water ambitions.

There were 6 responses to this question from LPAs from across the Oxford Cambridge geography, including Milton City Council and Greater Cambridge Shared Planning Authority, as partner LPAs. Examples of good planning policies that have or are expected to result in positive outcomes for water or contribute to LPAs water ambitions include:

- Various references to different policies (not described) in their Local Plans
- Cambridgeshire Flood Risk Management Strategy
- Water efficiency standards as set out in Northwest Cambridge Area Action Plan
- 9. Please provide details of any planning policies (past, current or emerging) in your LPA that may lead to negative outcomes for water or conflict with your LPA's water ambitions.

There were no responses to this question from respondents.

10. Please provide details of any water-related planning policies (past or current) in your LPA that failed or are failing to achieve the intended positive outcomes. Please tell us why these are failing.

There was 1 response to this question, from a representative of Cambridgeshire County Council.

The respondent cited the Block Fen/Langwood Fen masterplan for water storage and mentioned that this had not yet progressed as expected.

Document hierarchy – Project overview

