Oxford to Cambridge
Integrated Water Management Framework

Maximising planning for water

Building on the baseline review

Analysis: Water in planning policies and their application

Policy development and implementation analysis focused on Local Planning Authorities' (LPAs) evidence base and stakeholder engagement

We built on the information gathered throughout the policy baseline review and from stakeholder engagement to explore the approach taken in greater detail, through the lens of our partner LPAs focusing on:

- Policy development
- Development management

Our approach, we:

- Reviewed the evidence base used to inform planning for water and sought to identify whether evidence sources are being used optimally
- Reviewed the engagement approaches taken by LPAs to prepare their local plan (identifying issues, gaps and opportunities)
- Reviewed the development of the local plans, specifically:
    - assessing the LPA's overall approach to integrated water management
    - analysing how water policies interact with the wider local plan
    - analysing the LPAs' growth and thematic policies against water ambitions

The criteria to review the package of policies were drawn from Environment Agency internal advice notes and National Planning Policy Framework (NPPF) prompts. We have assumed that if the LPAs meet these criteria (i.e. take the actions the criteria are describing) they will realise water ambitions and achieve better outcomes for water (i.e. water quality/environment, water resources, flood risk and wastewater). The criteria were used to inform the toolkit and checklists.

Refer to the "note explaining the supporting documents for the Planning and Water Toolkit" to download the checklists of items to consider.

The **development management** analysis consisted of a detailed review of several planning applications.

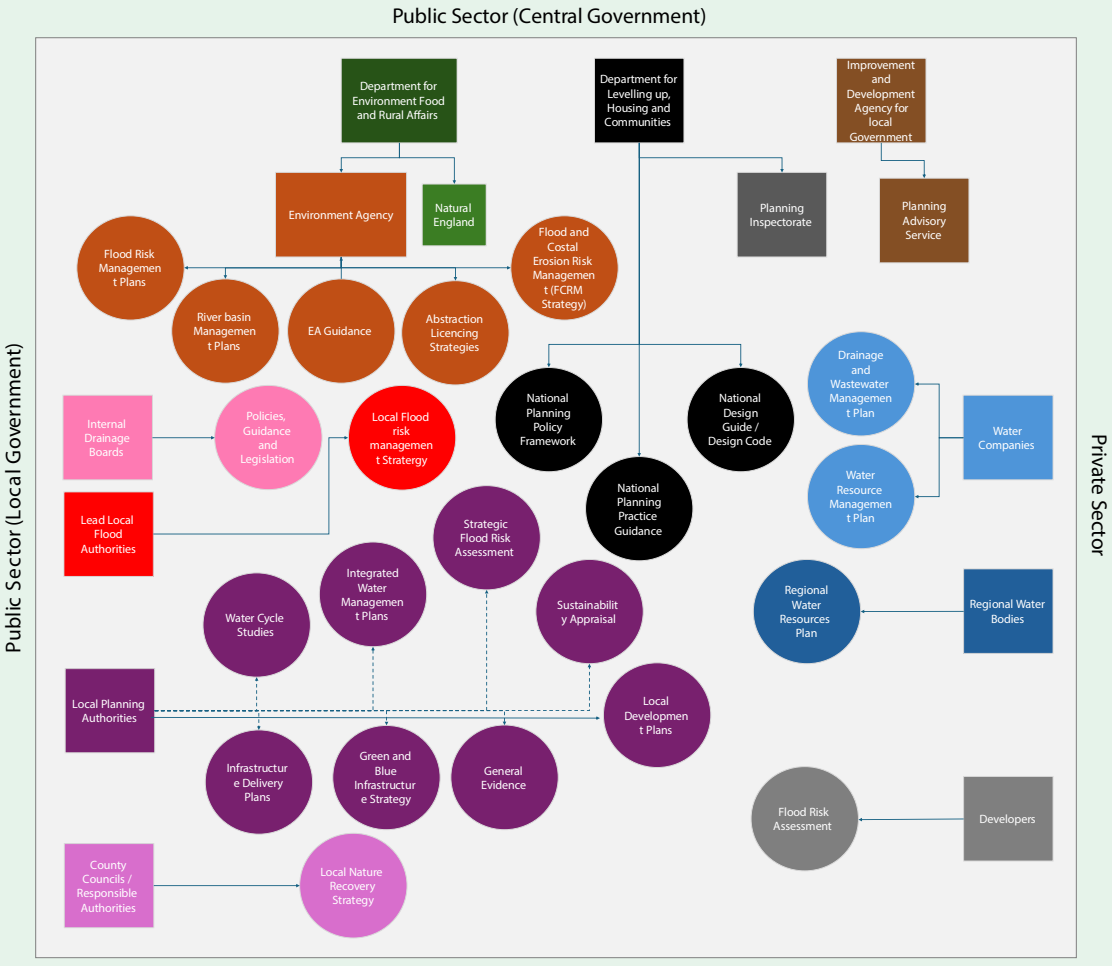
- 18 planning applications high level review
- 5 planning applications were selected for additional analysis (3 Greater Cambridge Shared Planning and 2 in West Oxfordshire District Council)

All proposals involved the development of 50 homes or more (submitted between 2021 to 2023) and were of varied status (determined, in determination or decision awaiting) and mixed type (full, outline permission with certain matters reserved).

Policy development analysis

- We compared the expected use of each evidence base against how it is being used
- We developed a stakeholder map (see diagram below), illustrating important relationships and authorship of key evidence documents
- We carried out a review of expectations for outward engagement from LPAs: the issues, gaps, and opportunities this presents
- We mapped the relationship between some water stakeholders and an LPA's plan-making team
- We carried out a detailed analysis of our partner LPAs' overall approach to integrated water management and level of water outcome ambition, through both adopted and emerging local planning policies. These were assessed against a selection of specific criteria for each of the 4 water disciplines.
- 6 adopted water related policies from our partners LPAs were mapped against their strategic objectives. We looked at ways to maximise synergies and interactions between water related planning policies and local plan objectives, including avoiding potential unintended conflicts.

Stakeholder map



We found:

Synergies

- multifunctional green and/or blue infrastructure
- climate change
- flood risk management
- water quality
- the natural environment, and/or biodiversity
- health and wellbeing
- high-quality and sustainable design
- sustainable communities
- water resources

Potential conflicts

- competition for space
- reconciling the interests of different uses
- prioritisation of sustainable and water sensitive construction and design practices
- reconciling economic growth and development priorities with sustainability, climate and environmental protection needs

- Some of our partner LPAs' growth and thematic policies were reviewed against their water ambitions:

We found that there is a need to amplify the narrative that water is a strategic matter collecting evidence at relevant scales like catchments and collaborating with specialists on studies for example, Water Cycle Studies (WCS) or equivalent.

Development management analysis

We carried out a high-level review of applications with a focus on "water", which included a review of the type of details submitted in support of the development proposal and matters raised during the determination.

Where an application had been determined, focus was directed to any conditions that had been attached or, if relevant, to any reasons for a refusal that had been issued.

Where a detailed review of an application was undertaken this focused on the inter-play between stakeholders and the timings between the different parts of the application process.

From our analysis, we noted the importance of:

- pre-application discussions between applicants and LPAs to identify and resolve potential issues early on, as well as;

- the submission of appropriate information and documents, such as flood risk assessments and surface water management strategies.

However, we found that there is often a lack of clarity regarding the type of information required and the timing of its submission.

Case studies

We have compiled some information gathered from our analysis, this is presented in the form of case studies considering each of our partner LPA's overall approach to integrated water management and realisation of water ambition.

Case study 1: Greater Cambridge (water resources)

We found that, given the water resource challenges and anticipated growth in the area, there were opportunities for the emerging Greater Cambridge local plan to raise its water resources planning ambitions by

- ensuring policies address water resources through a cross-boundary and catchment-based approach
- recognising that water resource management is a cross-cutting issue across relevant policies, both water and non-water related
- ensuring policies address the adequate provision of water supply infrastructure
- ensuring policies redirect development away from areas of severe water stress - there may be a future need to prioritise developments in areas of lower risk to water stress, where possible, based on the ongoing impacts of climate change on water availability
- including details on design principles and technologies for new developments to address water stress
- raising ambition levels for water efficiency policies which can be achieved through policy wording to make it a requirement for new residential developments. Considerations should also be given as to whether exemptions are appropriate.
- ensuring policies address water efficiency in existing infrastructure/developments, where possible, for example, when improvements/extensions are proposed.
- linking policies which promote green and blue infrastructure protection and enhancement to water resource management, despite having an influence on water supply.

Case study 2: Milton Keynes City Council (wastewater)

By commissioning a Water Cycle Study and Integrated Water Management Study, which are not required by planning policy, Milton Keynes City Council is demonstrating a high level of ambition regarding the use of evidence to support the development of adopted Plan:MK and the emerging MK City Plan. The Council currently has an adopted green infrastructure policy and is looking to emphasise the role of blue infrastructure through the emerging plan, informed by Milton Keynes Nature, Green and Blue Infrastructure (GBI) Study. Overall, the emerging MK City Plan's ambitions show a positive trajectory for development of planning policies that if implemented would contribute to better wastewater management, including by

- promoting both green and blue infrastructure, including a range of blue spaces and features linked to water management
- applying an integrated approach to water management at the catchment scale as envisaged by the emerging Oxford to Cambridge area integrated water management framework programme and emphasised in the Defra Plan for Water
- improving the planning practice of flood and water infrastructure needed for the growth of Milton Keynes up to 2050
- considering the long-term effects of climate and environmental change

This shows that the Council is trying to take an integrated approach to water environment, despite the limited guidance on the approach as the national and regional integrated water management frameworks are still being developed.

We found that, given the water resource challenges and anticipated growth in the area, there were opportunities for the emerging MK City Plan to raise its wastewater planning ambitions further by

- referring to wastewater in the plan's strategic objective
- drafting terms of engagement between Anglian Water Services and Milton Keynes City Council to ensure that wastewater infrastructure supports further growth
- making sufficient provision for wastewater infrastructure and phasing of allocation policies to ensure that wastewater infrastructure can be upgraded to support future growth
- stating that SuDS (Sustainable Drainage Systems) should be allocated and designed strategically, emphasising the importance of involvement of key stakeholders (including Milton Keynes City Council, Anglian Water, and the Internal Drainage Board) in their future management and maintenance.

Case study 3: West Oxfordshire District Council (water quality)

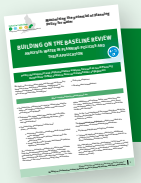
West Oxfordshire District Council's requirements for SuDS (Sustainable Drainage Systems) show high ambition. However, we found that, given the anticipated growth in the area, there were opportunities for the emerging local plan to raise its water quality planning ambitions further by

- ensuring consistency of application of integrated water management practices
- referencing local water issues, as outlined in the River Basin Management Plan, considering Source Protection Zones and drinking water abstraction.

Document hierarchy – Project overview

Stage 1

Policy baseline review



Building on the baseline review
Analysis: Water in planning policies and their application

Stage 2

Planning and water toolkit

Development management checklist

Instructional video

Policy case studies technical note

Pre-application guidance

Policy development checklist

Conditions technical note

Written user guide

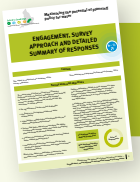
Stage 3

Reporting – key recommendations

Reporting – key opportunities

Engagement

Engagement



Engagement, survey approach and detailed summary of responses