

Reporting – key recommendations



The recommendations are based on conclusions from our consultant partners (Eunomia and LUC). These were reviewed by the Environment Agency's Oxford to Cambridge project team. These are split into:

1. Recommendations for Local Planning Authorities
2. Recommendations for other organisations

Each set of recommendations has been organised under the following headings:

- Policy development: evidence-base
- Stakeholder engagement
- Drafting the plan and policies and integrated water management
- Development management (only for LPAs' recommendations)

Recommendations for Local Planning Authorities (LPAs)

Here are recommendations aiming to support LPAs manage water through local planning practices effectively.

Policy development: evidence-base

1. LPAs should collect evidence across relevant timescales and administrative boundaries, especially at the scale of a water management catchment.
 - For example, LPAs could engage with Catchment Partnerships to communicate data needs and share relevant intelligence and evidence. LPAs should think about the value of commissioning joint evidence studies. These studies assist with the demonstration of strategic cooperation between authorities, support the implementation of Integrated Water Management IWM and promote an integrated Catchment-Based Approach. Additionally, they help save resources.
2. Early discussions with the Environment Agency and other partners are crucial to identify the scope of evidence needed and potential challenges.
 - For example, LPAs could ask for feedback on project briefs. They should also use working groups wherever possible to encourage participation throughout the duration of a commission.
3. Commissioning a Water Cycle Study (WCS) or equivalent study early in the plan making process is essential.
 - LPAs should use the latest available data, consider the priorities of relevant plans and strategies, and refer to complementary evidence studies, such as a Strategic Flood Risk Assessment (SFRA).
4. LPAs should engage with stakeholders to understand and act on water supply risks.
 - LPAs should seek to outline the level, and nature, of future water demand related to where and when new development is likely to occur.
5. Having a defined water champion per authority can help spread knowledge and raise ambition regarding improved management practices.
6. LPAs should share innovation and best practices, including digitisation, sharing and pooling of data and develop joint approaches to data commissioning.

Stakeholder engagement

1. Through the preparation of a Local Plan, LPAs should strive for continuous, timely, meaningful and action-driven engagement with statutory consultees, water companies and other infrastructure providers.

- This approach aims to ensure that water ambitions are effectively incorporated and that stakeholders have ample opportunity to contribute their input.

2. Engagement should aim to understand risks to the delivery of strategic plans.

- For example, Natural England and the Environment Agency can help you understand how water shortages, and increased water abstraction

might affect the natural environment, especially protected sites and habitats.

3. Clear communication of policy implementation and assessment expectations to case officers, potential applicants, and other stakeholders is important.

- Pre-application discussions should be used to ensure potential issues are resolved early on. LPAs should be clear about the evidence that is needed to demonstrate policy compliance. Water related policies should be used and upheld in decision making. Stakeholders should be used to inform the wording of potential conditions.

Drafting the plan and policies and Integrated Water Management (IWM)

1. LPAs should develop innovative policies to implement IWM and address water issues where evidence suggests alternative action, outside the national framework, is needed.

2. Water focused objectives should be included in the Local Plan to ensure effective water planning.

- For example, objectives should recognise the importance of IWM, Sustainable Drainage Systems (SuDS), and Blue and Green Infrastructure.

3. Policies should encourage water sensitive design features at an early stage of project design.

4. Policies addressing water challenges should be clearly worded to avoid ambiguity.

- Where an LPA decides to add caveat to a policy using terms like 'practicable' or 'viable', these conditions should be clearly explained.

5. Using information from a SFRA, LPAs should show that sites in flood risk areas can be made safe from flooding for their lifetime, and that the development won't increase flood risk elsewhere.

- They should use site specific policies to ensure flood reduction measures are included.

6. Growth should be phased in line with water supply and wastewater infrastructure, considering delivery risks to avoid or minimise environmental harm.

- LPAs should work with the Environment Agency, water companies, and other stakeholders to track future demand and safeguard land for water and wastewater infrastructure.

7. LPAs should include policies in Local Plans that address pressures on local water resources and wastewater capacity.

- These policies should consider the cumulative effects of development on water resources, capacity and the environment. For example, these should specifically reference the protection and enhancement of the water environment, River Basin Management Plan (RBMP) objectives, affected waterbodies, European habitats and nature recovery objectives in the Local Nature Recovery Strategies (LNRS).

8. LPAs should use the optional standard of 110 litres / person / day in new residential development, as provided for in the 2010 Building Regulations, as amended in 2024.

- They should also consider whether more stringent standards are necessary, for example to 85 litres/person/day, particularly based on local evidence. For non-residential development, LPAs should seek to include water usage limits, based on reputable benchmarking standard such as BREEAM 'Excellent' or 'Very Good'. If this is not possible, LPAs should provide criteria for what is considered not 'practicable', 'economically viable', or 'technically viable'. Additionally, LPAs should introduce policies that require or encourage water efficiency in building renovations.

9. LPAs should ensure that their Local Plan's policies and proposals protect and enhance water quality and the water environment.

- They should also support the effective implementation of Biodiversity Net Gain (BNG) requirements to address ecological decline, including short-term impacts on ecosystems.

Policies for allocated development sites should specify developers' roles in achieving these ambitions. Policies and proposals should be linked to deliver the environmental objectives in relevant RBMPs and LNRs. LPAs and other public bodies must remember their obligation under the Water Environment Regulations 2017, to 'have regard to' RBMPs when exercising their functions.

10. LPAs should create policies that promote the various benefits of the water environment, and adopt an integrated approach to water management.

- They should use multiple sources, including the SFRA, WCS and LNRs, to identify measures that can manage flood risk, improve water resources and water quality, enhance biodiversity and reduce urban heat island effect.

11. LPAs should incorporate effective monitoring practices into relevant plans to ensure the impact of water-focused policies and proposals are properly tracked.

- To ensure a policy is successfully implemented, LPAs should clearly define what success looks like. This includes outlining relevant indicators and data sources to track progress. It's also crucial to specify who is responsible for monitoring and to ensure there are adequate resources to support the recommended activities. For example, using water meters and sensors in properties is essential for comparing with planning policies or conditions. Planning conditions should require developers to contribute to monitoring activities.

Development management

1. Early engagement with applicants and water related stakeholders is crucial to identify and resolve potential water related issues.

- For example, pre-application discussions help identify and resolve water related issues that might come up or get worse due to development.

2. Planning applications should only be validated once submitted information is accurate and appropriate following an initial review.

- This could help improve the quality and robustness of submitted planning applications. LPAs should consider engaging with statutory

consultees and other water related stakeholders at the pre-application stage to help identify what water related material is required and provide clear direction to applicants.

3. With support from the Planning Portal, planning application formzzzs should request sufficient detail on the impact of the proposed domestic or non-domestic development on water.

Recommendations for other organisations

These recommendations aim to enable organisations to support LPAs manage water through local planning practices effectively. Organisations include, the Environment Agency, water and sewage companies,

Lead Local Flood Authorities (LLFAs), the Planning Advisory Service and the Ministry of Housing, Communities and Local Government.

Policy development: evidence base

1. Organisations responsible for strategic water plans should guide LPAs on where to find and utilise relevant water related evidence.
 - Data in Water Resource Management Plans (WRMPs), River Basin Management Plans (RBMPs) and Drainage Water Management Plans (DWMPs) should be transparent and easy to follow for local plan making. Strategic water plans should be sent proactively to LPAs.
2. Water related evidence should be easy to use and interpret, with up to date and standardised data.
3. The role of different stakeholders in collecting and managing water related data should be reviewed to enhance monitoring.
 - Charities and the public could help collect and distribute data through citizen science type projects. Monitoring should assess the effectiveness of solutions into developments, like water use in new developments compared to efficiency requirements.
4. The importance of water as a strategic matter should be emphasised in the National Planning Policy Framework (NPPF) and national Planning Policy Guidance (PPG).
 - For instance, national PPG should highlight the need for coordinating evidence-based studies and explain how an Integrated Water Management System (IWMS) can use evidence from a Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) to develop an action plan for water that policies in the Local Plan should seek to embed. Guidance should provide signposts to supporting resources like CIRIA's guidance on 'Delivering better water management through the planning system'.
5. More guidance and pro-active engagement are needed to explain the role and preparation of key water related strategic documents.
 - Guidance should clearly explain how strategic water plans, such as a DWMP, FRMP, RBMP and a LFRMS and other strategic plans, such as LNRS should inform the development of policies. This recommendation should be considered following Defra's commitment to review strategic flood risk planning by 2026.
6. Water Cycle Studies, or any similar water evidence study, should be a mandatory part of a Local Plan's evidence base.
 - This will help ensure that LPAs actions align with the Environment Agency's expectations for strategic plans and new development. This requirement would be like the existing obligation for LPAs to produce a SFRA.
7. More national guidance is needed on the role of Internal Drainage Boards (IDBs) in water planning.
 - For example, IDBs can help provide information and updates on key plans and strategies.
8. Given the urgent water resource conditions, water companies should outline their investment plans and potential risks in their strategic plans, considering emerging and future growth.
 - Additional guidance should be provided on using the WRMP process to inform different planning stages. For example, model questions can be drafted to help each party ask the most relevant questions.
9. Lead Local Flood Authorities (LLFAs) should be encouraged to develop a Surface Water Management Plan (SWMP) or an alternative.
 - This plan will help identify ways to manage surface water in a specific area and guide future development and investment.

Stakeholder engagement

1. National PPG should provide more guidance on the need for water stakeholders to formally engage in plan making activities and submit formal comments when Local Plan drafts are published.

- This will ensure they can attend and actively participate in the examination of the Local Plan, helping to highlight water as an important issue.

2. To improve understanding of water planning processes, LPAs and other stakeholders should have access to bespoke learning resources.

- This guidance would enhance knowledge of the water cycle, highlight connections with planning practices, and clarify the roles of other stakeholder groups. These resources can be shared through professional networks, universities, including RTPI-accredited Planning Schools, LPAs, consultancies, and the Planning Inspectorate.

Drafting the plan and policies and Integrated Water Management

The Planning Policy Guidance needs to be reviewed and updated to clearly state the ambitions for Integrated Water Management through planning and other practices in support of achieving better outcomes for water.

- All 4 water disciplines, water resources, flood risk, water quality and environment should be

given equal importance. National policy should recognise the multiple functions, and wide-ranging benefits of IWM. This consistent message should also be reflected in other strategic water plans.

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

