

WORSHIPFUL COMPANY OF WATER CONSERVATORS

BRIEFING ON THE RESPONSE TO THE MINISTRY OF HOUSING , COMMUNITIES AND LOCAL GOVERNMENT, AND DEFRA WORKING PAPER ON DEVELOPMENT AND NATURE RECOVERY JANUARY 2025

1 The Worshipful Company of Water Conservators ('WCWC') is a City of London Livery Company focussed on the long-term health of our water resources and the broader environment. Our members include senior professionals from water, environmental and related industries and regulators, along with others who share our concern for water and the environment. Our experience and knowledge ranges from the complexities of environmental sciences, through the application of engineering to deliver the goals identified by those sciences, and the subsequent management of the assets created. The WCWC's purpose is *promoting a diverse and sustainable environment*.

2 As part of that purpose, the WCWC has been responding to relevant consultations particularly on matters relating to water conservation. These are archived on its website.

<https://waterconservators.org/policies-and-practices/>

It has produced several responses and think pieces relevant to the management of storm overflows as a contribution to the evolution of national water conservation policy and practice. This response follows those practices. It looks forward to being able to make further inputs as the opportunity arises in the future. This consultation raises some fundamental issues. In preparing this response, the WCWC provides a background explanation of those for the wider constituency of readers of its response, whilst recognising that this will not be essential in the response to Defra.. The WCWC stands ready to make further contributions.

3 This includes reference to the WCWC response to the consultation by the Ministry of Housing, Communities and Local Government (MHCLG) on the proposed changes to the National Planning Policy Framework in September 2024. It is relevant to reprise the summary of the response which is still very much relevant to this Working Paper; and is included as Appendix 1 of the submission.

4 The revised framework was published in December 2024

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

The WCWC notes that none of the key issues on water conservation have been addressed and the supporting guidance is still well out of date.

5 The Ministry and Defra have now issued this working paper

<https://www.gov.uk/government/publications/planning-reform-working-paper-development-and-nature-recovery/planning-reform-working-paper-development-and-nature-recovery>

It forms part of a series of working papers on different aspects of planning reform, designed to inform further policy development in collaboration with the wider sector.

6 Most of the response by the WCWC concerns the impact of the proposals, in the Working Paper, on water conservation. The full response may be found on the WCWC website.

7 It points out that many of the issues causing angst in the interface between economic and housing development with water conservation as manifested in the NPPF remain unresolved. It is disappointing that these were not addressed in the revised NPPF issued in December 2024. These need addressing before any new system is introduced especially regarding ensuring adequate provision and payment for infrastructure impacts especially for water supply and waste water treatment.

8 The WCWC supports the notion of integrated, holistic management of water and draws attention to a more formal system of Catchment Management, as envisaged in the 2023 Defra Water Plan and articulated by the WCWC thinkpiece produced for Defra (see <https://waterconservators.org/thinkpieces/>).

9 It considers that the case for the proposals for new processes is not well made. There are many generalisations which need to be addressed, such as a more formal definition of environmental obligations. Many of the suggestions for the content of Delivery Plans would be better located in more formalised Catchment Plans. The formal system of approval of Delivery Plans will not necessarily speed things up or make technical burdens less. The proposals are coy about the concept of Delivery Bodies, particularly in relation to the established concept of Competent Authorities. The financial case is not strong nor demonstrated and the funding arrangements appear superficial and incomplete. The Working Paper needs to be clarified.

10 The WCWC has long opined that there are 'too many pieces of a jigsaw of delivery' of water conservation and these proposals add more without resolving the issues with the existing pieces. They need testing against the Environmental Principles Duty of the Environment Act 2021 and the Better Regulation Framework. 'Planning, to get Britain building and turn the tide on nature's decline' definitely. Whilst holistic management, catchments and outcomes over processes do, indeed matter, the new processes as set out do not address these in an appropriate manner.

Footnote;:Just as this document was signed off for submission, the WCWC became aware the likelihood that the Environment Agency will cease Catchment Nutrient Balancing.

[EA set to withdraw "ineffective and unworkable" catchment nutrient balancing](#)

The WCWC included information on this at length because there seems to be no cross reference or connection between the ideas set out in the Working Paper and the ideas set out by the EA. It strengthens the submission by the WCWC on the current fragmented approaches. And provides some hope that catchment permitting will play a leading role in future.

