

WORSHIPFUL COMPANY OF WATER CONSERVATORS

BRIEFING ON A THINKPIECE ON THE INTERFACE OF WATER MANAGEMENT AND THE PROVISION OF THE NEW HOMES PROGRAMME

JULY 2025 .

1 The WCWC has prepared this Thinkpiece as it understands the need for many more homes. But it is concerned about the impact on the water environment. It has identified 'pinch point' issues and suggested some ways forward, which are intended to help the New Towns Task Force. The confrontation of national water strategies and development strategies is high profile news, for example concerns on this issue in Buckinghamshire.

Battle begins over new homes approved in historic village without sewage capacity - BBC News

2 It appreciates that the Task Force might well be aware of all the points and takes the view that it is better to be told twice rather than not at all. Furthermore, it also appreciates that several of the points it makes, lie within a complexity of policies, regulations and multiple contributors. Hopefully the points it makes can help to form a framework to use in the programme of New Towns and minimise the impact on the environment.

SUMMARY OF POINTS

3 This summary provides an overview of a discussion of the issues and some suggestions. The underlying arguments supporting this summary are given in the longer paper which can be found on the Company website .

4 The WCWC recognises that many of the challenges facing the New Towns Task Force require a resolution of the lack of connection of several national strategies and the need for review of several regulations. 'We are where we are' and this resolution may take too long for the work of the Task Force. The WCWC would be pleased, in due course, to set out what it suggests needs doing to prepare for post 2030.

5 All that the WCWC can offer on this, is to advocate a swift resolution and implementation of the provisions of the Planning and Infrastructure Bill, particularly in relation to the issues around nutrients in rivers and capacity for water supply and sewage treatment.

6 The WCWC suggests a New Town Delivery Forum led by the Task Force to include the Environment Agency, Natural England, Water UK and the Local Government Association to address issues like this. This suggestion has been accepted yet not progressed. It is suggested that a Delivery Forum should include these as well.

7 The Task Force will also find it useful to talk directly with the Water Companies and arms-length regional water resources organisations, such as Water Resources East. And to talk to the Future Homes Hub and the British Institute of Kitchen Bedroom & Bathroom Installation.

8 There are many Plans which affect the location of New Towns (and that is part of the complexity which needs sorting out). The WCWC has focussed on the value of Catchment Plans. And it does urge the Task Force to have a detailed discussion on these with the EA, (and possibly the Natural England). Catchment Plans should take account of other tangential

impacts, such as increased gravel extraction, for which the WCWC is not aware of any discussions.

9 The WCWC points out that Water Resources Plans will be key in determining the location of New Towns; it has suggested that the new industries, such as those in the 'giga-economy', which have high water demands, could be located in coastal towns.

10 Some catchments are more stressed: firstly, in regard to nutrients and some with regard to water resources; others will be stressed in relation to the ability to absorb increased effluent discharges and remain with 'use criteria.' Others will be stressed due to flood risk. Building in a flood risk area is controversial and planning applications must prepare a Flood Risk Assessment under the Floods and Water Act of 2010. The high-risk areas as far as water resources are concerned are deemed as Water Stressed Areas. And the WCWC suggests a new concept of Stressed Drainage and Wastewater Treatment Management Plans. So, these can all be summarised as Stressed Catchments in a framework and mapped out. Development in these should be avoided, if possible but the opportunities may be rare. There needs to be a hierarchy in these areas of actions required in these areas – as for BNG and flood risk – i.e. with development avoided if possible. But if not possible then the developments must pay fully for mitigation measures (e.g. extra costs of increased infrastructure for sewage treatment and alternative water supplies) to avoid increased pressures in these catchments.

11 The problems of S106 of the Water Industry Act 1991 need to be understood much better. The 'Grampian' clause in planning permission, which allows development to continue, but the properties only occupied when the infrastructure is provided, does not seem politically adept. The system does need more flexibility, including the provision of Notified Items under the PR24 determination for unprovided developments.

12 This note does not explore the issues around Biodiversity Net Gain, but it is aware of the government's proposal to ease this requirement for smaller developments. The WCWC awaits consultation on this matter, but pro-tem considers that this ought not to be a universal easing, but a framework which allows easing where appropriate (it draws on the analogy of current proposed exemptions under Environmental Permitting Regulations) and that no development should cause Biodiversity Net Loss. It might suggest the concept of Biodiversity Net Zero in which there is neither gain or loss.

13 The suggestions by the WCWC draw as much as possible on what can be extracted out of the existing system rather than relying on changes.

Framework for Homes

For homes in Flood Risk Areas

- Buildings in flood zones should be constructed with flood-resistant materials and raised floor levels to protect against flooding.
- Water fittings for 110 l/p/d with incentives for 90 l/p/d as per the Ofwat scheme
- Ordinary water meters, maybe with a new incentive to install smart water meters
- Compulsory enhanced SuDS with no incentives as offered in company schemes
- 'Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

For homes in Water-Stressed Areas

- Compulsory water fittings for 90 l/p/d with no incentives as offered in the Ofwat scheme
- Compulsory smart water meters
- Voluntary SuDS, with incentives as per Company schemes
- 'Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred

For homes in Stressed Catchments, apart from water stressed, e.g. nutrient neutrality and Stressed Drainage Plans

- Water fittings for 110 l/p/d with incentives for 90 l/p/d as per the Ofwat scheme
- Ordinary water meters, maybe with a new incentive to install smart water meters
- Compulsory enhanced SuDS, no incentives as offered in Company schemes
- 'Bag and bin it' compliant bathrooms and toilets required

For all other homes

- Water fittings for 110 l/p/d with incentives for 90 l/p/d as per the Ofwat scheme
- Ordinary water meters, except shared properties with smart water meters, with a new incentive for smart water meters in other properties
- Voluntary SuDS with incentives as per water company schemes
- Bag and bin it' compliant bathrooms and toilets for sanitary waste preferred
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The WCWC would be pleased to discuss these ideas