



The countryside charity
Hampshire

VERSION 1 as at September 2021

Position Statement

Water

CPRE Issues

Background

We are in a time of climate uncertainty, rapid development and changing planning control. The new Environment Act is passing through parliament (Jan 2020) and may substantially alter the regulatory background. The climate emergency may bring water issues more to the fore.

Chalk streams are globally rare and richly biodiverse. 85% of global chalk streams are in Southern UK. They are fed from the principal aquifers held in the chalk and the greensand rocks underlying the county. Rivers in south Hampshire relies more on surface flow over the sands and gravels there. The water we drink in Hampshire comes mostly from the same source as that which feeds these iconic rivers, which support a flourishing socio-economic environment.

Rainfall feeds the aquifers. This then flows underground to the surface streams taking about 3 weeks. Any pollutants put on the ground will migrate to this store.

Drinking water is taken both from boreholes and from river flow. Demand is rising. The number of households is set to increase and average water use in the UK is 140 litres per person per day (Lppd). Aquifers are not being fully recharged and the upper courses of many streams (once winterbournes) are now permanently dry.

Climate change is set to reduce the effective rainfall. More droughts in the summer and heavier rainfall in the winter will cause damage to rivers and their biodiversity through low flows and floods. Water will be wasted as it flows off the surface as fluvial flood discharges, not through to the aquifer. This will lead to an increasing concentration of pollutants. Nitrate concentrations have already led to closure of drinking water boreholes and currently (2019), following a Natural England directive, are holding up planning decisions because of the impact on the Solent.



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CPREH Guidance.

In order to protect our iconic chalk streams and their essential aquifers which form the natural capital of our environment, economy and recreational landscape, the Water Focus Group for CPRE Hampshire seeks to research, monitor and promote all aspects of water, eg: resource, use, quality and quantity, landscape, biodiversity and planning in Hampshire. Ecosystem services are fourfold (supporting natural processes, provisioning economies, regulating natural processes and cultural (aesthetic, recreation etc).

To that end a CPRE Hampshire Water Policy has been devised to:

- 1 Support efficient and sustainable use of existing water resources
- 2 Support demand reduction
- 3 Link planning and water
- 4 Support agricultural practices to conserve and store water in the river catchments
- 5 Change attitudes.

Water underpins many aspects of Local Plans, or should!

CPRE Hampshire supports planning policies which protect and enhance the water environment. CPRE National Office is currently updating its policy on water in the light of emerging Regional Water Policies and government legislation.

Applying CPRE Hampshire Water Policy to the evaluation of Local Plans

The earlier representations are made the better. The issues and options phase should be used to reinforce positions taken already in District Groups' responses to individual planning applications.

Local Plans vary considerably in their attention to water issues. South Downs National Park Local Plan can be taken as a model for other local plans as it represents best practice. **It is strongly recommended that this is looked to for its prioritising of water issues before evaluating other Plans.**

The approach prioritises natural capital (water, soils, air, biodiversity, landscape) and recognises what the ecosystem services they provide for people and each other. Natural



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capital and ecosystem services underpin the thinking. Ecosystem services are fourfold (supporting natural processes, provisioning economies, regulating natural processes and cultural (aesthetic, recreation etc.)

It can give a useful template for comparison and wording. Policy SD17 and SD39. **(SDNP LOCAL PLAN)**

1.The Local Plan should require efficient and sustainable use of water resources and protect the water environment

-Example Policy

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:

a) Sustainably manage land and water environments; b) Protect and provide more, better and joined up natural habitats; c) Conserve water resources and improve water quality; d) Manage and mitigate the risk of flooding; e) Improve the National Park's resilience to, and mitigation of, climate change;

a. The Local Plan should take clear account of available water resources and set out to protect the water environment. It should be aware of catchment approaches and the importance of natural capital and environmental services. It should make clear reference to all Environment Agency Special Protection zones (SPZ) and private borehole owners. It should comply with all aspects of the EU Water Framework Directive or its replacement.

It is helpful to know where the water comes from when evaluating the Local Plan and where it drains to. It is also important to know which companies are responsible for water supply and waste water treatment in the Local Plan area. There are 6 water companies operating in Hampshire. Some only supply water, others deal with waste as well. The company's Water Resource Management Plans (WRMP) details the sources and constraints they face.

b. The Local Plan should demonstrate an understanding of the local water stress/availability situation



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Example Policy

Water Management Development will be permitted provided that:

- a) it does not result in the deterioration of and, where possible, assists in improving water quality and be planned to support the attainment of the requirements of the Water Framework Directive;*
- b) it complies with national policy and guidance in relation to flood risk;*
- c) it does not result in a risk to the quality of groundwater within a principal aquifer, including Groundwater Source Protection Zones and there is no risk to public water supplies;*
- d) all new homes (including replacement dwellings) achieve a water consumption standard of no more than 110 litres per person per day;*
- and e) all new non-residential development of 500sqm or more achieve the BREEAM107 'excellent' credit required for water consumption (reference Wat 1). Criteria d) – e) need to be satisfied unless it can be demonstrated that it is not financially viable*

Planning should ideally be responsive to the advice of the Water Companies when drawing up the Local Plan. Once a development has planning permission the company has a statutory duty to supply water and deal with the waste. They can be consulted in the early stages and most Local Planning Authorities will consider the advice. (However, water is still not a planning constraint).

c. The local plan should encourage **rainwater harvesting** on small (household) and large (district) scales

d. Soakaways and sustainable urban drainage **systems** (SUDs – permeable surfaces) should be stipulated to return more rainfall directly to the aquifer.

e. There should be support for infrastructure improvements to waste water treatment works so they have the capacity and refinements to strip pollutants and return clean water to the surface systems. All infrastructure planning of roads, pipelines, industrial units, waste to energy plants etc should prioritise, consider and mitigate their impact on the surface and sub surface water environments.



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f. Flood attenuation measures should be stipulated to slow the transfer of heavy rain to the river channels thus reducing floods (ponds and reservoirs also create biodiverse recreational landscapes).

Example Policy

1. Development proposals that affect groundwater, surface water features, and watercourse corridors will not be permitted unless they conserve and enhance the following:

a) Water quality and quantity, and the Local Plan achieve requirements of the European Water Framework Directive, or its replacement;

b) Ability of groundwater, surface water features and watercourse corridors to function by natural processes throughout seasonal variations, within the immediate vicinity, and both upstream and downstream of the site of the proposal;

and c) Specifically for surface water features and watercourse corridors: i. Biodiversity; ii. Historic significance; iii. Character, appearance, and setting; iv. Public access to and along the waterway for recreational opportunities; and v. Ability for maintenance of the watercourse, including for flood risk management purposes.

2. Development within Groundwater Source Protection Zones (SPZs) will only be permitted provided that there is no adverse impact on the quality of the groundwater source, and provided there is no risk to its ability to maintain a water supply.

3. Development proposals must incorporate measures to eliminate risk of pollution to groundwater, surface water and watercourse corridor features which would harm their ecological and/or chemical status.

4. Development proposals for the provision of agricultural reservoirs that aid demand management, water efficiency and water storage will be permitted where they are compatible with the National Park purposes.

2.The LOCAL PLAN should support demand reduction

a. The design and fitting out of buildings should promote recycling and require reduction of water use as a priority.

b. There should be clear regulation and monitoring through the planning and building control regimes supporting the target 100 Lppd.



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- c. There should be an intention to support investment in better pipeworks to prevent leaking laterals and mains.
- d. There should be a commitment to encouraging water saving awareness so that water saving measures in new builds are not subsequently replaced with water expensive ones by the owners.

3. Link Planning and Water

Attention to 1 and 2 bring planning and water resources and use together. However, the regulatory environment is changing, the new Environment bill and the instigation of the Regulatory Alliance for Progressing Infrastructure Development (RAPID) change the relationship between water suppliers and Local Authorities. CPRE H will keep a watching brief as National Office engages with Rapid. (Feb 2020)

Example Policy

The sustainability of the development proposals will be measured against the following principles of sustainable development:

Eg Sustainable Water – Implement water use efficiency measures, reuse and recycling and minimise the need for water extraction. Designing to avoid local issues such as flooding, drought and water course pollution

4 Support Agricultural Practices which conserve and store water in the river catchments.

- a. The Local Plan should clearly aim to protect and enhance the delivery of multiple ecosystem services which arise from farm, woodland and agricultural practices in the river catchments they occupy. The rivers are intimately linked to the catchment (the area from which they draw their water).
- b. The Local Plan should support appropriate land use which can improve water stores in the biomass and the soil thus attenuating flooding. (Tree planting, catch cropping, humus retention, water meadows).



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c. There should be an appreciation that inappropriate digging of drainage ditches and reservoirs can alter river discharge quantity and quality downstream. Awareness of possible pollution pathways from silage and chemical stores is essential to reduce pollution load.

d. Sacrificial strips along rivers and streams should be encouraged to allow the flourishing of marginal ecosystems, reduce pollution and increase attenuation.

Example Policy

This Local Plan aims to protect and enhance the delivery of multiple ecosystem services which arise from farmland and woodland, and the buildings associated with them,

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to: a) Sustainably manage land and water environments; b) Protect and provide more, better and joined up natural habitats; c) Conserve water resources and improve water quality; d) Manage and mitigate the risk of flooding; e) Improve the National Park's resilience to, and mitigation of, climate change;

5 Change Attitudes

The natural capital and ecosystem services approach may not be obvious in the draft Local Plan you are evaluating. This approach should be there, your early comment may revise the angle taken by the Local Planning Authority or at least prompt the inclusion of water issues more prominently in the relevant sections.

Footnotes

Test Valley Local Plan 2011-2029 is good on water policy :

Policy E7 Water Management p122

<http://testvalley.gov.uk/planning-and-building/planningpolicy/localdevelopmentframework>



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South Down National Park Local Plan 2018 is very good on Natural Capital and Ecosystem Services

Chap 4 Core policies p37 SD2 Ecosystem services (Core policy SD2)

Chap 5 Water p75

<https://www.southdowns.gov.uk/wp-content/uploads/2018/06/Chapter5-A-Thriving-Living-Landscape.pdf>