



CIWEM

The Chartered Institution of Water
and Environmental Management

27th March 2006

Carmel Howard
Barker Review Team
4/E1, 1 Horseguard's Road
London
SW1A 2HQ

Dear Ms Howard,

Barker Review of Land Use Planning

The Chartered Institution of Water and Environmental Management (CIWEM) is the leading professional and qualifying body for those who are responsible for the stewardship of environmental assets. The Institution provides independent comment, within a multi-disciplinary framework, on the wide range of issues related to water and environmental management and sustainable development.

Our concern relates to the issue of getting the balance right between economic, social and environmental objectives in the English planning system. It is our contention that water continues to sit quite low on the list of priorities as far as issues such as housing, land-use planning, etc are concerned. Whilst planning policy statements do mention the need to consider water, such policy has not necessarily been embraced as fully by planners as we would like to see.

A key concern to CIWEM is that water companies are not statutory consultees in the planning process, and we assert that this situation should be changed. The Sustainable Communities Plan stands as an example of where housing growth has been targeted in those parts of the country which happen to be the driest, have the greatest current demand on water resources and are most vulnerable to the impacts of climate change. That the new communities will have ambitious water efficiency targets placed on them as a condition of development mitigates the problem, but it does not remove it. The water savings will merely reduce the increase in total demand (a 25% efficiency target still leaves at least a 75% increase in demand for resources, locally). We are pleased that recently, particularly in the South East, there has been greater engagement between planning bodies and stakeholders from the water sector. However, we consider that this has been due to the efforts on the part of the water industry to make their concerns heard rather than because an official arrangement is in place whereby water issues are afforded full consideration within the planning process.

Whilst water resources planning operates on a twin-track philosophy (demand reduction and resource development in sustainable co-optimisation), housing policy appears to be following a one-track, 'predict & provide' approach. The two do not necessarily sit easily together.

We would like to see some kind of initiative which pulls together and cross-references all planning guidance relating to water. We recognise that the ODPM is opposed to producing a dedicated Planning Policy Statement on water, but urge that there must be some improved methodology of pulling all the disparate sources of guidance which cover this essential resource together.

On a wider level, CIWEM considers that the Government should review the requirement to register land with the Land registry. Currently nearly 70% of land in the UK is owned by around 1% of the population and a significant proportion of this is not required to be registered with the Land Registry because has remained under the ownership of the same family for generations. CIWEM considers that in an age where there appears to be pressure on the amount of available land for housing in the south-east, and when increasing levels of environmental management are necessary in all areas, it is important that the Government has a proper record of the use to which all land is being put, and precisely who owns it. Such a review should also examine whether there should ever be circumstances whereby release of land is required in the national interest.

We hope these comments are of use to you. Should you wish us to expand upon or clarify any points we have raised, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Reeves', with a stylized flourish at the end.

Nick Reeves
Executive Director