REVIEW OF THE WATER RESOURCES MANAGEMENT PLAN PROCESS

It is Government policy to review the impact of legislation, post implementation, to establish the costs and benefits of the policy and whether improvements to the process can be identified. In line with this, we have asked the In House Policy Resource[1] to review the process which delivered the first round of statutory Water Resources Management Plans (WRMPs)[2].

This questionnaire is designed to provide input to that Review by exploring the impact of the WRMP process on a sample of organisations including: the water industry, those with a regulatory interest, a range of NGOs and other interested parties.

Your views are very important to us. We want to understand your experience and see how the policy is working in practice. In particular, we want to learn whether, having placed the WRMPs on a statutory footing, the process is delivering the expected benefits - namely public engagement and transparency in water resources management planning. We also want to identify any unintended consequences so that we can consider whether any lessons might need to be taken into account in future policy making and whether improvements to the existing process can be made.

This questionnaire is in 3 sections, not all of which may be relevant to you or organisation. Please feel free to complete as many or as few as apply. We may contact you to discuss your responses in more detail:

- Part 1 - Information about you (asks about you, your role in relation to WRMP, and seeks permission to quote your views in our analysis)

- Part 2 - Process (seeks your general views on the effectiveness of the WRMP process, and your experience of the specific stages)

- Part 3 - General (gives the opportunity for you to add any other information you would like us to consider)

Please complete and return the questionnaire by e-mail to martin.placek@dft.gsi.gov.uk or post a hard copy to Martin Placek at the In House Policy Resource, Zone 4/12, Great Minster House, 76 Marsham Street, London, SW1P 4DR by **FRIDAY 21st JANUARY 2011**. The Review report is

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[1] IHPR is an independent team of experienced civil service policy advisors drawn from a number of departments. Their work focuses on projects related to the development, delivery and evaluation of policy and programmes - including projects designed to improve policy effectiveness through organisational, process or systems improvements.
[2] Water Resource Planning Guideline published April 2007 and amended November 2008 following feedback received during the production of water company WRMP in spring 2008 [insert hyperlink to guideline]

expected to be finalised at the end of the financial year and will be placed on Defra's water resources planning web page - http://www.defra.gov.uk/environment/quality/water/resources/planning/index.htm - shortly thereafter. As you type, text will appear in red , this is part of the form function for later action.

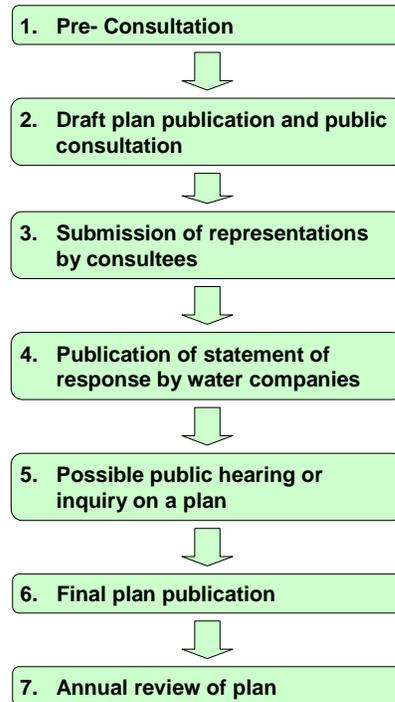## Part 1 - Information about you

Name	Jen Heathcote
Role	Head of Freshwater & Wetlands Research Policy
Organisation	English Heritage
Address	1 Waterhouse Square, 138 - 142 Holborn, London, EC1N 2ST
Phone Number	07979 206699
Email	jen.heathcote@english-heritage.org.uk
1.1 Please explain briefly the role of your organisation in relation to WRMPs.	English Heritage is the Government's adviser on the historic environment and our role is to ensure that the protection of the historic environment is fully taken into account at all stages and levels of environmental planning.
1.2 Information provided to this review may be subject to publication or disclosure in accordance with access to information regimes[3]. If you do not want us to quote your views in our analysis and want your response treated as confidential please make this clear.	

1.3 We may want to talk to you about your response. Please indicate if you would be willing for us to contact you.	Yes	No

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[3] Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004.

Part 2 – Process - The statutory Water Resources Management Plan (WRMP)

2.1 The WRMP process has seven stages.

1. **Pre- Consultation**

2. **Draft plan publication and public consultation**

3. **Submission of representations by consultees**

4. **Publication of statement of response by water companies**

5. **Possible public hearing or inquiry on a plan**

6. **Final plan publication**

7. **Annual review of plan**

The following questions seek your views/experience of the general principles and on each of the specific stages. **It would be helpful, if you could give examples based on your experience with the process to illustrate answers throughout.**

WRMP Process		
2.2 In general, what works well in the process? Please give examples.		
2.3 In general, what works less well in the process? Please give examples.		
2.4 Are there ways in which the process could be streamlined? Please give examples.	Yes ☐	No ☐
2.5 Please explain briefly the reasons behind your answer.		
2.6 Do you think the frequency of the planning process and the overall time period covered by the WRMP is about right?	Yes ☐	No ☐
2.7 Please give examples to illustrate your answer and explain briefly what you would change.		
2.8 What, if anything, could Defra do better as part of this process?		
The Guideline		
2.9 The Environment Agency has published guidelines to inform the WRMP process. Are there any areas of the guidelines that you think could be simplified or otherwise improved?	Yes ☐	No ☐

2.10 Please explain briefly the reasons behind your answer.		
Roles		
2.11 Are the roles of those contributing to the WRMP e.g. regulators, water companies and consultees clearly defined throughout the process?	Yes ☐	No ☐
2.12 Please explain the reasons behind your answer and give details of where you think further clarity would be helpful.		
Alignment with Periodic Review		
2.13 The timing and outcome of the WRMP process was intended to inform water company business plans and OFWAT's periodic review process. Has this worked in practice?	Yes ☐	No ☐
2.14 It would be helpful to have details of any reasons why this was not the case and examples of the problems you experienced.		
2.15 Please provide any recommendations you have for improving the process in the future.		
2.16 Were there any instances where the WRMP process duplicated or overlapped with another process?	Yes ☐	No ☐
2.17 Please comment on your answer, where possible providing examples. If your answer was "yes", it would be helpful to know what form the duplication took and what additional costs you incurred as a result of the duplication.		
Cost of WRMP process		
2.18 What was the cost to you/your company? If possible, please give a breakdown for different stages of the process.		
Wider Impact of WRMP		
2.19 Do you think the WRMP objective "to look ahead 25 years and describe how each water company aims to secure a sustainable supply-demand balance for the supply of water taking into account the implications of climate change and assessing the impact of each supply option in terms of greenhouse gas emissions" has been achieved?	Yes ☐	No ☐
2.20 Please give your reasons.		
Stage 1: Pre- Consultation [Regulators & Key Stakeholders only]		
2.21 Did you encounter any problems with this stage?	Yes ☐	No ☐

2.22 Please comment on your answer, outlining any problems and what you think caused them (provide examples if possible).
2.23 What do you think worked well in this stage? Please give examples.
2.24 What, if any, improvements would you recommend for this stage of the process? Please give examples.

Stage 2: Draft publication and public consultation		
2.25 Did you encounter any problems with this stage?	Yes ☐	No ☐
2.26 Please comment on your answer, outlining any problems and what you think caused them (provide examples if possible).		
2.27 What do you think worked well in this stage?		
2.28 What, if any, improvements would you recommend for this stage of the process?		

Stage 3: Submission of representations by consultees		
2.29 Do you think the process was open and transparent, enabling all stakeholders to inform the development of WRMPs?	Yes ☐	No ☐
2.30 Please explain the reasons behind your answer and give examples. If you think stakeholder representation could be improved in the process the please provide details.		
2.31 Did you encounter any other problems with this stage?	Yes ☐	No ☐
2.32 Please comment on your answer, outlining any problems and what you think caused them (provide examples if possible).		
2.33 What do you think worked well in this stage? Please give examples.		
2.34 What, if any, improvements would you recommend for this stage of the process? Please give examples.		

Stage 4: Publication of statement of response by water companies		
2.35 Did you encounter any problems with this stage?	Yes ☐	No ☐
2.36 Please comment on your answer, outlining any problems and what you think caused them (provide examples if possible).		
2.37 What do you think worked well in this stage? Please give examples.		

2.38 What, if any, improvements would you recommend for this stage of the process?

Stage 5: Public hearing or inquiry on a plan
There are 2 sets of questions - the first set are for respondents engaged in or affected by plans that were not the subject of a public hearing or inquiry, the second set are for respondents engaged in or affected by the Thames Water/South East Water inquiries and Portsmouth Water call to an inquiry/ hearing.

For respondents not engaged in or affected by a public hearing or inquiry

2.39 Did you feel that your views on the WRMP were taken into account despite not having a public hearing on inquiry?	Yes ☐	No ☐
2.40 Please provide details (with examples if possible).		

For respondents engaged in or affected by the Thames Water and SE Water inquiries or the Portsmouth Water call to an inquiry/hearing

2.41 What was your input to the public inquiry or hearing?		
2.42 Did you encounter any problems with this stage?	Yes ☐	No ☐
2.43 Please comment on your answer, outlining any problems and what you think caused them (provide examples if possible).		
2.44 What do you think worked well in this stage? Please give examples.		
2.45 What, if any, improvements would you recommend for this stage of the process? Please give examples.		
2.46 What was the cost of the inquiry process to you?		

Stage 6: Final plan publication [where this stage has been reached in your area]

2.47 Did you encounter any problems with this stage?	Yes ☐	No ☐
2.48 Please comment on your answer, outlining any problems and what you think caused them (provide examples if possible).		
2.49 What do you think worked well in this stage? Please give examples		
2.50 What, if any, improvements would you recommend for this stage of the process? Please give examples.		

Stage 7: Annual review of plan [where this stage has been reached in your area]

2.51 Did you encounter any problems with this stage?	Yes ☐	No ☐
2.52 Please comment on your answer, outlining any problems and what you think caused them (provide examples if possible).		
2.53 What do you think worked well in this stage? Please give examples.		

2.54 What, if any, improvements would you recommend for this stage of the process? Please give examples.

Part 3 - General

3.1 If there are any other comments you would like to put forward to this review that we have not covered in the questions in Parts 1&2, please give these below. Awareness of, and engagement with, the process was variable nationally. Occasionally regional officers (principally Regional Planners) were invited to pre-scoping meetings, more often we received the Draft WRMP and SEA for consultation and sometimes there was no knowledge of the process until the final report was released.

We note that there is reference to taking account of 'cultural heritage' – i.e. the historic environment - in the Guidelines (Section 11.4.2 Environmental and Social Impacts) but offer that in our experience, this can be incomplete or incorrect at the appropriate level of resolution. In addition, we note that the (historic) environmental baseline data presented was not always sufficiently comprehensive or robust to allow those conditions to be adequately assessed.

For clarity, we would like to highlight the main points to be taken into account when considering the possible impact of WRMPs on the historic environment:
•   Abstraction can create negative impact on buried archaeological remains as well as for wetland habitats. We note that on occasion, Natural England was consulted extensively to provide statements on the potential environmental impact of abstraction on wetland sites (SSSIs and LNRs). However, as far as we are aware, no comparable consideration was given to the historic environment aspect of wetland areas even though these may contain buried, waterlogged archaeological and palaeoenvironmental (relict wetland) remains of significant interest and fragility. Such sites may be even more vulnerable to new groundwater abstractions or increases on existing licenses than modern wetland habitats.
•   Key heritage assets such as World Heritage Sites, Scheduled Ancient Monuments and other nationally important archaeological remains and archaeological priority areas, listed buildings, registered parks and gardens, and conservation areas (including their settings), need to be protected and where appropriate enhanced;
•   English Heritage promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory protection but also those which are locally distinctive, valued and important. Broader heritage values need to be protected wherever possible and consideration should be given to these as well as designations when examining environmental issues (for example how water levels might affect historic remains) in order to avoid the loss of historic landscape values, local identity or historic character generally;
•   Where location-specific schemes are developed, English Heritage will require more detailed assessments of the relevant historic environment to be undertaken.
•   English Heritage would strongly advise that the relevant local authorities' conservation staff are involved throughout the preparation and implementation of the WRMPs, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment.

Many thanks for completing the questionnaire. Please save it and e-mail to martin.placek@dft.gsi.gov.uk .

If you would like this document in a different format, please contact our Customer Services department:
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