

**West Midlands Regional Assembly**

**Water Resource Strategy  
Regional Action Plan**

1. This response has been prepared by the West Midlands Regional Assembly Secretariat in consultation with members of the Regional Environment Group.

**General Points**

2. The initiative to develop a Regional Action Plan is supported, but represents a movement of strategy development on water resources to a national level, instead of funding and placing activity at the regional level. The level of integration of policy and alignment of programmes in the proposed Regional Strategy will therefore require greater attention by the EA, water companies and the new regional agencies to ensure that water resources is integrated into policy, the implications for the implementation of the Habitats Regulations, the development of regional programmes and the integration of the work of River Basin Management Plans. The latter include a number of targets for the achievement of good environment status for 2015 and 2021, it is unclear what the relationship between these pan regional targets are to the Regional Water Resources Strategy Actions.
3. In terms of the draft, although styled as an Action Plan, the actions read as higher objectives or policy and are difficult to comment on with any purchase at this stage. The suggested options read as generalised activities that might or might not be taken forward subsequent to further decisions. It is unclear when and who will be involved in these decisions and how local authorities and the regional authorities can be involved or influence the outcome.
4. With the climate change projections indicating continuing summer decreases in rainfall it is particularly important that there is clarity at both the regional and local levels on the access to water resources, particularly when options are being considered for growth of settlements. The recent examination in public also showed that the close working between agencies needs to take place to ensure that the interrelationships between the need to water for new development and rivers and to reduce the adverse effects on European habitats sites needs early and careful consideration within the planning system.

5. The use of language such as encourages, consider and support is used frequently in the in the Action Plan. This indicates the development of further programmes of action that will require actions to be developed with a cost, timescale and outcome with appropriate body and/or partnership and lead project officer to enable the action to be carried out. It is suggested that the EA should co-ordinate this activity through the Water Task Group.

### **Specific Points**

6. A2 It is important to ensure close working with local authorities to ensure that new water infrastructure takes account of the level and locations of growth proposed in the region up to 2026.
7. B2 The use of sustainable drainage is supported in appropriate locations and types of development as part of the development of sustainable communities. The barriers to the adaption of SuDs more widely relates to funding and maintenance rather than policy.
8. B4 Support. There needs to be greater connexion with the work of Natural England to develop green infrastructure that can contain appropriate wetlands related to growth areas. More strategically work is required to know where the greatest impact can be made and how much wetland will make a strategic difference over the longer tem in the context of climate change to habitats and the availability of water resources.
9. C3 The current draft RSS Phase 2 promotes working towards water neutrality by utilising the highest practical water efficiency measures. The implementation of the Code for Sustainable Homes will also will drive greater water efficiency in housing.
10. C8 The greater priority to integrate water resources planning with the regional and local planning system is supported. This will entail greater resources, research and input across agencies so that sufficient understanding of water resources pressures are built into the regional and local authority thinking behind plans at an early stage.
11. C16 Planning growth represents only a small part of the pressure in these areas and the application of the Code for Sustainable Buildings already provides for higher standards. In areas of pressure, an overall approach with water companies and other users which takes into account the whole range of measures may be more appropriate rather that targeting new development specifically.