



Thames Blue Green Economy (TBGE) Submission to the EFRA Select Committee on the NPS for Water Resources March 6th 2019.

Executive Summary

1. The NPS for Water Resources is hopelessly inadequate. By its complete absence of reflecting global best practice in water management, the Sustainable Development Goals, and the purpose of environmental legislation to better protect the environment, this NPS cannot deliver resilient, sustainable nor safe water infrastructure.

2. If this NPS is adopted, it will lead to further environmental degradation and biodiversity loss by prioritising grey infrastructure proposals over IWRM and other approaches. It will not reduce carbon emissions in line with the Paris Agreement because grey infrastructure proposals are outdated, concrete dependant and do not address the root causes of biodiversity loss and climate change. Furthermore, the NPS will increase public disenfranchisement with our governance structures which limit people's involvement in the decision making process and by prioritising private company interests (profits) over the public interest.

3. This backward policy (and others like it), explains why Extinction Rebellion and the World Climate School Strike Movement under Greta Thunberg, are gaining such support.

4. Recommendation: The NPS should be rejected in its entirety.

Introduction

5. TBGE is a broad alliance including academics, civil engineers, economists, environmentalists, health practitioners, journalists, lawyers, politicians and scientists, all of whom are working together, to achieve the most cost effective and sustainable solutions for London and the rest of the UK's water-related environmental problems.

6. Guided by the principles in the Rio Declaration 1992, the Aarhus Convention, the Sustainable Development Goals (SDGs) and the Water Framework Directive, TBGE as a priority, seeks the

implementation of integrated water resource management (IWRM) for the Thames River Basin and for all the river basins in the country.

7. IWRM is the only cost effective and sustainable solution for our river basins. IWRM will enable us to adapt and to be made resilient in the face of an expanding population, biodiversity collapse and climate change.

8. IWRM, as shown elsewhere, would result in enormous benefits for the whole environment, human physical and mental health, and would create thousands of local jobs. IWRM would also help the transformation to the Green Economy, an essential part of sustainable development and achieve compliance with the SDGs and the Water Framework Directive.

Will the draft NPS encourage the sustainable, resilient and safe infrastructure projects required to meet future challenges?

9. No. The only way the NPS can encourage sustainable, resilient and safe infrastructure projects, to meet future challenges, is by embracing IWRM. IWRM provides multi-faceted benefits that would help to deliver the SDGs. IWRM is also the only way to achieve the above stated aims of sustainability, resilience and safety and yet there is **NO** mention of IWRM in the NPS. Why not?

10. In fact, disturbingly, there is no mention of any of the SDGs in this NPS nor the fact that all SDGs need to be considered together. The UK has agreed to implement the goals and to achieve the targets by 2030. Clearly, it has no such intention, if this NPS is allowed to proceed in its current form.

11. SDG 6 deals with water and there is a specific target re the implementation of IWRM. It is obvious that if the UK is to achieve the SDG targets by 2030, it must ensure that its policies reflect the goals and set out how the targets will be achieved by 2030. See

<http://www.unwater.org/publications/progress-on-integrated-water-resources-management-651/>

12. Recommendation: Back to the drawing board to devise a policy that will implement the SDGs and achieve the SDG targets in particular with relation to SDG 6.

Are the assessment criteria that must be considered in development consent applications adequately set out?

13. No. The assessment criteria need to show how the proposal in question helps to deliver the SDGs. It does not and is therefore inadequate.

14. Furthermore, it is contrary to the purpose of environmental law to take away considerations of the need for a type of proposal from decision makers at the development consent assessment process. At development consent, members of the public properly engage with a proposal and it is imperative that their input on all matters in relation to the development can be considered by the decision makers.

15. The key purpose of ensuring early and effective public participation, as granted by the Aarhus Convention and the Environmental Impact Assessment Directive, is to ensure that the best decision is arrived at. Members of the public often have the best local information and can raise issues that would otherwise be overlooked.

16. Recommendation: Back to the drawing board. The NPS has to reflect the obligations under the Aarhus Convention and the Environmental Impact Assessment Directive that decisions have to be made that do not further degrade the environment.

What are the implications of streamlining the planning process, whereby a NSIP already included in a Water Resource Management Plan (WRMP) does not need to be revisited as part of a development consent?

17. As stated above at paras 13-16 , it is contrary to the Aarhus Convention, the Environmental Impact Assessment Directive and the best available science, to take away key considerations from the public and decision makers, at the development consent level.

18. The development consent level is when a particular proposal comes to the attention of members of the public. The NPS and WRMP process is too remote and difficult for ordinary people to engage with.

19. Recommendation: This proposal needs to be removed from the NPS.

How effectively has DEFRA consulted with relevant stakeholders, such as industry and other parts of Government, in the development of the draft NPS?

20. Not sufficient for members of the public. The public will not realise that if this NPS is approved in current form, all future proposals that fall within the NSIP and/or a WRMP, will not be able to challenged along grounds of needs for or alternatives to (such as consideration of an IWRM approach) for such a proposal.

21. Recommendation: A further consultation needs to be carried out. All the water companies need to be directed to inform the public via their customer database of what the Government intends to do with the NPS and how the public needs to respond to it.

Are there any other issues that the Committee should consider when scrutinising the draft NPS?

22. Yes.

23. Recommendation: A change is needed as set out below.

An overall water policy is needed to replace all previous water policies such as the NPS for Waste Water and this NPS under scrutiny.

Policy must not be used to circumvent law.

All aspects of water must be dealt with by one holistic policy to ensure integration.

The SDGs must be fully reflected. IWRM must be prioritised.

Public participation in environmental decision making must be protected and enhanced. Therefore, a policy must not take away considerations of alternatives to or need for a proposal.

A water commissioner needs to be appointed for each river basin to ensure that all decisions related to water are integrated, sustainable and safe-this can only be achieved by decisions that are made in line with the Aarhus Convention, the SDGS and the Paris Agreement.

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