



**North Hertfordshire Local Plan (2011-2036)
Examination**

**MATTER 27: The optional national technical
Standard for Water Efficiency**

Written Statement

**Affinity Water Limited and
Anglian Water Services Ltd**

February 2020

27.1 Through Policies SP9 and D1, the Local Plan seeks to require adherence to the Government’s optional national technical standards for water efficiency and the nationally-described internal space standards for dwellings. As you know, for such policies to be sound, they must be supported by clear evidence of need and evidence that viability has been considered. In relation to both:

a) Is the evidence of need adequate/sufficiently robust?

b) Has viability been properly considered??

All new dwellings have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

The National Planning Policy Framework policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. The local planning authority can consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

To include the optional higher target, national planning practice guidance states that it will be for a local planning authority to establish a clear need based on:

- existing sources of evidence
- locally specific evidence including water cycle studies.
- consultations with the local water and sewerage company, the Environment Agency and catchment partnerships.
- consideration of the impact on viability and housing supply of such a requirement.

Existing sources of evidence

The main source of information for establishing need is the Environment Agency 'Water Stressed Areas Final Classification (2013)'¹, which identifies areas of serious water stress where household demand for water is (or likely to be) a high proportion of the current effective rainfall available to meet that demand.

The Environment Agency advises the Secretary of State that the areas classified as 'Serious' in the final classification table should be designated as 'Areas of serious water stress'. Affinity Water the incumbent water company for the District and the neighbouring Anglian Water region is identified as an area of serious water stress. There is an existing water transfer from Grafham reservoir in the Anglian Water region into the Affinity Water area (Hertfordshire).

¹ <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>

Furthermore, in 2019, DEFRA launched a consultation called “Measures to reduce personal water use²”. UK national average water use is 141 litres per person per day which is higher than other European countries such as Germany -121 litres per person per day. Said consultation raised questions around setting a per capita consumption target (which has already been set by OFWAT to all water companies), modification of the Building Regulations relating to water efficiency, Water Labelling, etc. We expect DEFRA to announce further details later on this year.

The Environmental Bill 2020³, published on the 30 January 2020, and highlights that: “There is more to be done. Our changing climate is associated with more extreme weather; higher risks of drought and an increase in flooding which seriously affects people’s lives and assets”. It is clear that Government recognises the future challenges our society will need to overcome. Water is a finite resource and this Bill stresses the importance that water plays in people’s lives and the environment as a whole.

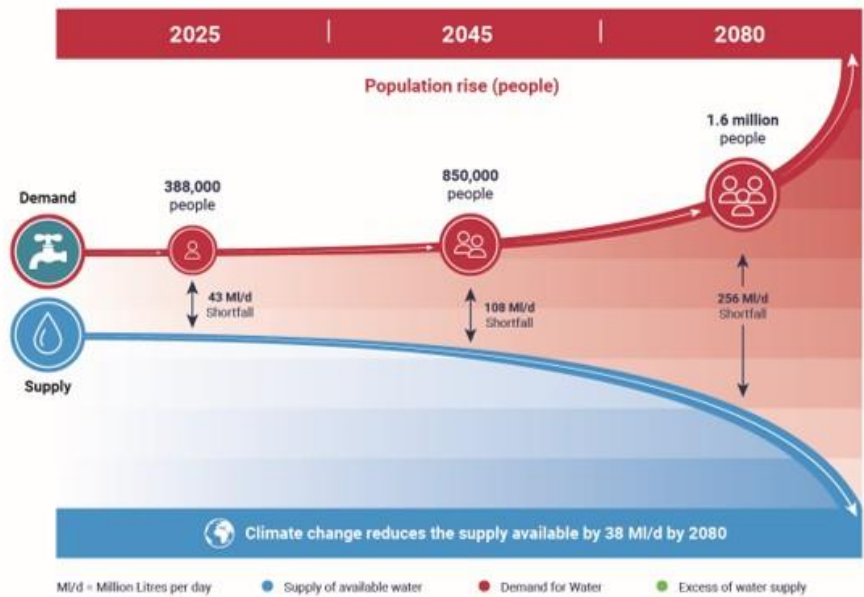
Finally, the Environment Agency is working on a Water Resources National Framework which will be published later on this year. In this first draft it emphasises that: “ 3,435 million extra litres of water per day will be needed for public water supply to address future pressures and around 50% of the national need is in the Southeast”. Regional plans will be required to reduce demand – to 110 litres of water per person per day by 2050 and drive down water use across all sectors.

In relation to Water Resources Management Plans (WRMP):, Anglian Water’s Water Resource Management Plan 2019⁴ identifies how Anglian Water will manage the supply and demand balance over the next 25 years. It shows what demand and supply measures will be introduced to manage the longer term challenge of population increase, climate change, drought resilience and growing environmental needs. It is currently forecasted that our average supply-demand balance will be 249MI/d by 2045. In response, reducing the levels of consumption will help to counteract the reduction in resource availability as well as other proactive alterations.

² <https://consult.defra.gov.uk/water/measures-to-reduce-personal-water-use/>

³ <https://publications.parliament.uk/pa/bills/cbill/58-01/0009/20009.pdf>

⁴ <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/>



Similarly, Affinity Water’s WRMP for 2020-2025 sets out how we will maintain our supply and demand balance over the next 60 years (2020 - 2080) and accounts for population growth based on local authority plans. The Central Region⁵ presents the most challenging situation. This graph shows what the scene will look like if Affinity Water do nothing.

Increasing water efficiency in new homes would also reduce the amount of foul flows which are discharged into the public sewerage network managed by Anglian Water. This would reduce the impact on existing infrastructure.

Consultations with the local water and sewerage company and the Environment Agency

Anglian Water and Affinity Water are of the view that there is sufficient evidence to justify the inclusion of the optional higher water efficiency standard in the North Hertfordshire Local Plan.

It is essential to highlight that Affinity Water, after three consecutive years of dry winters, in 2019 launched a Drought Awareness survey reaching over 500,000 customers warning them of the possibility of a Temporary Use Water Restriction (known previously as ‘hosepipe ban’), for its Central region in Spring 2020, if this winter was below rainfall average.

Viability

Local Planning Authorities are required to consider viability taking account of local circumstances and policy requirements but Government research has shown that the cost of the optional higher water efficiency standard and associated cost can be as low as £6-

⁵ Bedfordshire, Berkshire, Buckinghamshire, Essex, Hertfordshire, Surrey, the London Boroughs of Harrow and Hillingdon and parts of the London Boroughs of Barnet, Brent, Ealing and Enfield.

9⁶ per dwelling. We therefore consider that this does not make the North Hertfordshire Local Plan, or individual development proposals, unviable.

For the reasons set above, we would like to recommend to the Planning Inspectorate to find North Hertfordshire Local Plan Water Efficiency policies 'sound' and that these can be adopted by the District Council.

⁶ [The Housing Standards Review Cost Impact report \(2014\)](#) prepared for DCLG advises that the cost of introducing such a standard would be between £6-£9 per dwelling.