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Our ref: NHDC LPlan – Matter 27

Date: 10 February 2020

Dear Louise

Examination of the North Hertfordshire Local Plan: further hearing sessions

Thank you for your email of 4 February 2020 relating to the further matters raised by the Planning Inspector and inviting us to provide further representation.

We would like to provide further representation on the issued raised regarding water efficiency standards, which is covered under Matter 27. Please see our comments below.

Matter 27 – the optional national technical standards for water efficiency and the nationally described internal space standards for dwellings.

Q. 27.1 a) Is the evidence of need adequate/ sufficiently robust?

Water supplies in Hertfordshire rely heavily on the Chalk aquifer. This underground source of water needs to meet much of our water requirements and supports the local environment. The level of abstraction presently being undertaken is considered to have a negative environmental impact. The scale of this impact is demonstrated by our decision to close the local Chalk aquifer in Hertfordshire to new water supply options. This automatically places constraints on the ability of water companies in this area to meet water demand without other regulatory control measures to achieve water efficiency targets.



We have sought to reduce and cease abstraction rights in the most damaging areas. This has included requiring local water companies to cease Chalk groundwater abstraction to help safeguard the environment. This programme of reducing dependence on the Chalk aquifer to meet water demand will require measures to be adopted across the board to improve water efficiency and reduce water consumption rates. Hertfordshire has some of the highest domestic water consumption figures per person in the country but is located in an area where rainfall totals are generally lower than many other parts of the United Kingdom. The implication of low rainfall totals has been experienced recently in Hertfordshire between 2016-2019. We declared an Environmental Drought in Hertfordshire due to many Chalk streams ceasing to flow. Local residents have formed environmental groups to campaign to restore their river (e.g. Revlevel Association) and reduce abstraction pressures on their rivers. The River Ivel runs through Baldock in North Hertfordshire. <https://www.thecomet.net/news/river-ivel-action-group-s-environmental-campaign-1-6357640> : The Comet Newspaper 5 November 2019

The impact of dry chalk streams and continuing Chalk groundwater abstractions impacting the water environment has been a national news story in 2019. There are many on-line examples and television clips to highlight the concerns both of impacts of low rainfall but also the underlying issue of the amount of water that is abstracted from the environment.

Water is essential to everything but it also needs to be valued and used wisely. There is recognition that we need to become more water efficient, and reduce unnecessary wastage of water. The majority of water abstracted in Hertfordshire is used in residential homes. The build and design of new homes (or conversions) needs to incorporate water efficiency devices to assist with reducing domestic consumption rates. The action is upon all of us and not solely the water companies to take action. Legislation under the building regulations provides the scope to adopt the higher building standards for water efficiency in water stressed areas. Hertfordshire is defined as a water stressed area. (Environment Agency 2015 <https://www.iow.gov.uk/azservices/documents/2782-FE1-Areas-of-Water-Stress.pdf>)

The adoption of the higher building control standards linked to water efficiency will be an essential component in reducing our impact on the environment and becoming more water efficient. This will assist the water companies in their water

resource planning requirements to meet the new water demand in an efficient and cost effective way while meeting their environmental objectives as required by the Environment Agency.

Please let me know if you have any questions.

Yours sincerely

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[cc: Sam Dicocco, North Herts District Council](#)