

Robin Brooks BA (Hons) MRTPI
Inspector for Three Rivers District Council's
Development Management Policies LDD
Examination
c/o Ian Kemp, Programme Officer

My Ref : DCES/RM/CM
Your Ref :
Date : 27 March 2013
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Department : Development Plans

Dear Mr Brooks

Three Rivers Development Management Policies LDD Policy DM8

I write further to your letter dated 25 March 2013 to clarify the Council's approach to water stress and to provide further comments on the Environment Agency's submission of the 22 February 2013 which suggests water consumption in new development should be limited to 105 litres per person per day.

We are satisfied that the policies within the Core Strategy and the Development Management Policies, together with the CPLAN Energy and Sustainability Statement requirements, that water stress has been addressed. It is also of note that Affinity Water and Thames Water support Policy DM8.

The NPPF does not require the Council to limit domestic water consumption. Paragraph 94 makes reference to the Climate Change Act 2008 and sets out the LPAs should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations: and Paragraph 99 sets out that Local Plans should take account of climate change over the long term, including factors such as water supply, amongst others.

The Core Strategy sets out the overarching policy in sustainable development and Policy CP1 states that:

All development in Three Rivers will contribute to the sustainability of the District. This means taking into account the need to:

- a) Tackle climate change by reducing carbon emissions, increasing energy and *water efficiency of buildings*, promoting the use of renewable energy systems, and using other natural resources wisely, including through the use of sustainable building materials

In addition, Policy CP8 of the Core Strategy seeks to ensure that development makes adequate provision for water infrastructure.

The Development Management Policies LDD acknowledges in paragraph 10.6 that Hertfordshire is one of the driest counties and that people in Hertfordshire also use more water than any other county. In paragraph 10.10 we also acknowledge that Three Rivers is an area of serious water stress and that reducing water consumption levels is important.

Policy DM8 sets out clearly the ways in which development proposals should reduce water consumption in paragraph j) iii) which states that:

The Council will support development where:

Efficient use is made of water resources and account taken of climate change. This means incorporating all or some of the following measures as part of new development:

- Rainwater harvesting techniques (for example providing waterbutts fitted to drainpipes and underground water storage as part of new development)
- Harvesting and recycling greywater (wastewater from baths, showers, washbasins, kitchen sinks)
- Using water efficient appliances (for showers, taps, washing machines, toilets etc.)
- Using water efficient landscaping and irrigation measures (for example by using drought tolerant plants)

The CPLAN Energy and Sustainability Statement required by Policy CP1 of the Core Strategy requires developers to set out how they will incorporate the above water efficiency measures into their development and the LDD directs the plan user to other sources of information such as the Building Futures Guide.

Part G of the Building Regulations (which addresses the water efficiency of buildings) was introduced in April 2010 and requires the potential consumption of water by persons occupying dwellings, to not more than 125 litres per person per day. In DCLG's publication 'Future changes to the Building Regulations – next steps' (Dec 2010) it stated that as there was 'no formal evaluation of how it is working in practice' they did not propose to look at changing Part G in the following year. Although the DCLG will be undertaking a review of Part G to look at its impact and effectiveness there is currently no available evidence to determine what effect this requirement has had on water consumption in the country.

We are aware that the mean figure for the period 2007 – 2012 in Affinity Water's Central Zone (of which Three Rivers is part) is 170.7 litres per day. It should be noted that this is current water usage from the existing housing stock. The introduction of Part G of the Building Regulations means that new residential development will be required to reduce water consumption by 45 litres per day against this statistic.

We are not adverse to setting targets above that required by Building Regulations as shown in Policy CP1 of the Core Strategy and Policy DM4 of the Development Management Policies LDD. However, these targets have been set against several years of evidence which justifies a target above that required by Building Regulations and we also have the tools to monitor this information through the CPLAN Energy and Sustainability Statement. This approach is also supported by the Planning and Energy Act 2008. We do not have the evidence to show that limiting water consumption to 105 litres per day as suggested by the Environment Agency and the Water Cycle Study can be achieved.

In summary we are satisfied that Core Strategy and Development Management Policies together with the CPLAN Energy and Sustainability Statement and Building Regulations Part G, addresses the issue of water stress and is conformity with the NPPF.

I hope the above clarifies the Council's intentions, but if there is any further information required please do not hesitate to contact me.

Yours sincerely,



Claire May MSc MRTPI
Principal Planning Officer